



DEPARTMENT OF CITY PLANNING RECOMMENDATION REPORT



City Planning Commission

Date: June 10, 2010
Time: After 8:30 a.m.
Place: Los Angeles City Hall
200 North Spring Street, 10th Floor
Los Angeles, CA 90012

Public Hearing: April 30, 2010
Appeal Status: Appealable to City Council
Expiration Date: June 28, 2010
Multiple Approval: Conditional Use, Zone Variance,
Modification of Height Regulations,
Reduction of Site, Site Plan Review

Case No.: CPC 2009-4168-CU-ZV-
SPR
CEQA No.: ENV 2009-4170-MND
Incidental Cases: None
Related Cases: CPC 5559
Council No.: 15
Plan Area: Harbor Gateway
Specific Plan: None
Certified NC: Harbor Gateway South
GPLU: Public Facilities
Zone: [Q]PF-1XL
Applicant: BHC Sage Park, L.P.
Representative: Kathleen Hill
Alston & Bird, LLP

PROJECT LOCATION: 1302 W. 177th Street

PROPOSED PROJECT: Demolition of existing education and agricultural support buildings and sheds for the formation of a joint public private development between the Los Angeles Unified School District and BRIDGE Housing Corporation, a non-profit housing developer. **The proposed project consists of three components: (1) construction of a multi-family residential housing complex with 131 affordable and market rate dwelling units to be built in four 3-story, maximum 38 foot high, buildings; (2) construction of a Joint Use Center consisting of a 3,937 square foot building approximately 20 feet high containing indoor meeting space and 16,511 square feet of outdoor patio and garden areas; and (3) an existing Juvenile Impact Program ("JIP") facility and obstacle course which will be relocated from its current location to the eastern portion of the project site and will include a covered assembly area with restrooms and 12,052 square feet of outdoor space for the obstacle course to be operated by the Los Angeles Police Department. A total of 205 parking spaces are proposed for the residential units and 13 parking spaces are proposed for the Joint Use Center and JIP facility.** The proposed project is planned to be located on an approximately 215,384 square foot northerly portion of the Gardena High School site abutting 177th Street classified in the [Q]PF-1XL (Public Facilities) Zone.

REQUESTED ACTION:

1. Pursuant to Section 21082.1(c)(3) of the California Public Resources Code, **Adopt** the Mitigated Negative Declaration (MND) for the above referenced project.
2. Pursuant to Section 12.24 U.21 of the Municipal Code, a Conditional Use permit for a joint public and private development for a project in the PF (Public Facilities) Zone having uses more intensive than those permitted in the most restrictive adjoining zones.

3. Pursuant to Section 12.24 F of the Municipal Code, a Modification of the height regulations of the PF zone to permit an approximately 37' 8" building in lieu of the maximum 30' height otherwise permitted in conjunction with the requested Conditional Use.
4. Pursuant to Section 12.27 of the Municipal Code, a Variance from Section 12.21 A.4 to permit 13 parking spaces for the Joint Use Center and JIP portions of the proposed project in lieu of approximately 78 spaces otherwise required.
5. Pursuant to Section 12.24 N and P of the Municipal Code, a Reduction of Site of City Plan Case 5559 (the Conditional Use for Gardena High School), and a Change of Use for a portion of the previously approved Conditional Use from a high school to a joint public and private development in the PF Zone.
6. Pursuant to Section 16.05 of the Municipal Code, Site Plan Review approval for a development project which creates, or results in an increase of 50 or more dwelling units.

RECOMMENDED ACTIONS:

1. **Adopt** Mitigated Negative Declaration No. ENV-2009-4170-MND.
2. **Disapprove** the request as filed.
3. **Approve a Conditional Use** permit pursuant to Section 12.24 U.21 of the Municipal Code, for a joint public and private development for a project in the PF (Public Facilities) Zone having uses more intensive than those permitted in the most restrictive adjoining zones, consisting of a multi-family residential housing complex with 90 affordable dwelling units to be built in four 3-story, maximum 38 feet high, buildings; a Joint Use Center consisting of a 2,884-square-foot building approximately 20 feet high containing indoor meeting space and 16,511 square feet of outdoor patio and garden areas, and a 1,752-square-foot Juvenile Impact Program facility and obstacle course, to include a covered assembly area with restrooms and 12,052 square feet of outdoor space for the obstacle course to be operated by the Los Angeles Police Department.
4. **Approve** a Modification of the height regulations of the PF zone pursuant to Section 12.24 F of the Municipal Code, to permit an approximately 37' 8" building in lieu of the maximum 30' height otherwise permitted in conjunction with the requested Conditional Use.
5. **Approve** a Variance, pursuant to Section 12.27 of the Municipal Code, from Section 12.21 A.4, to permit 13 parking spaces for the Joint Use Center and Juvenile Impact Program portions of the proposed project in lieu of approximately 55 spaces otherwise required.
6. **Approve** a Reduction of Site of City Plan Case 5559 (the Conditional Use for Gardena High School), and a Change of Use for a portion of the previously approved Conditional Use from a high school to a joint public and private development in the PF Zone, pursuant to Section 12.24 N and P of the Municipal Code,.
7. **Approve** Site Plan Review, pursuant to Section 16.05 of the Municipal Code, for a development project that creates or results in an increase of 50 or more dwelling units.
8. **Adopt** the attached Findings.
9. **Advise** the applicant that, pursuant to California State Public Resources Code Section 21081.6, the City shall monitor or require evidence that mitigation conditions are implemented and maintained throughout the life of any project, and the City may require any necessary fees to cover the cost of such monitoring.

10. **Advise** the applicant that pursuant to State Fish and Game Code Section 711.4, a Fish and Game Fee and/or Certificate of Fee Exemption is now required to be submitted to the County Clerk prior to or concurrent with the Environmental Notice of Determination (NOD) filing.

S. GAIL GOLDBERG, AICP
Director of Planning

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*ADVICE TO PUBLIC: *The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to the City Planning Commission Secretariat, 200 North Spring Street, Room 252, Los Angeles, CA 90012 (Phone No.213-978-1300). While all written communications are given to the Commission for consideration, the initial packets are sent to the week prior to the Commission=s meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request not later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at (213) 978-1300.

TABLE OF CONTENTS

Project Analysis	A-1
Project Summary	
Background	
Issues	
Conclusion	
Conditions of Approval.....	C-1
Findings	F-1
General Plan/Charter Findings	
Entitlement Findings	
CEQA Findings	
Public Hearing and Communications.....	P-1
Exhibits:	
A – Maps and Photographs	
A1 – Vicinity Map	
A2 – Radius Map	
A3 – Aerial Photograph	
A4 – Photographs of Subject Property and Surrounding Areas	
B - Plans	
Site Plan	
Conceptual Landscape Plan	
Elevation Plan	
C – Environmental Clearance:	
Mitigated Negative Declaration No. ENV-2009-4170-MND	

PROJECT ANALYSIS

Project Summary

The proposed project involves a joint public private development between the Los Angeles Unified School District (LAUSD) and BRIDGE Housing Corporation, a non-profit housing developer, on a northerly portion of the existing Gardena High School campus. While this area of the campus is largely vacant, some existing education and agricultural support buildings and sheds would be demolished. The proposed new project consists of three components: (1) a multi-family residential housing complex with 90 affordable and market rate dwelling units to be built in four 3-story, maximum 38 feet high, buildings; a Joint Use Center consisting of a 2,884-square-foot building approximately 20 feet high containing indoor meeting space and 16,511 square feet of outdoor patio and garden areas, and a 1,752-square-foot Juvenile Impact Program facility and obstacle course, to include a covered assembly area with restrooms and 12,052 square feet of outdoor space for the obstacle course to be operated by the Los Angeles Police Department. A total of 148 parking spaces are proposed for the residential units and 13 parking spaces are proposed for the Joint Use Center and JIP facility. The proposed project is planned to be located on an approximately 215,384 square foot northerly portion of the Gardena High School site abutting 177th Street classified in the [Q]PF-1XL (Public Facilities) Zone.

Background

LAUSD has determined that this site is not needed for educational use in the future due to long term demographic trends and the construction other new schools in the region. The proposed 90-unit residential project will be 100% affordable to residents earning up to 60% of the Area Median Income. The apartment units will be specifically intended to provide housing for LAUSD employees working on the Gardena High School site or within a three-mile radius, and these persons would be given preference in leasing the units. The proposed Joint Use Center would provide meeting space and gardens available to project residents and Gardena High School staff. The Juvenile Impact Program is already established on the site, and provides a community service, but the project would improve it through the provision of new upgraded facilities.

Community Plan

The subject property is located within the area covered by the Harbor Gateway Community Plan, which designates the property Public Facilities, consistent with the PF Zone. The property is also marked with a symbol on the Plan map designating it as a "Public Senior High School".

The proposed project is consistent with the Public Facilities land use designation because all of the proposed uses serve public purposes and community needs. These include the proposed Joint Use Facility that will serve both the Gardena High School staff and project residents, and the reconstruction and upgrade of the Juvenile Impact Program facility, which already exists on the site. The proposed residential apartment units will be 100% affordable and will therefore address a need for additional affordable and workforce housing in the community that is referred to repeatedly in the Community Plan text. All of the proposed uses of this project that are not permitted by right in the PF (Public Facilities) Zone, are allowed by conditional use approval pursuant to Section 12.24 U 21 LAMC, as is recommended within this approval. Therefore, the proposed project is consistent with the applicable Public Facilities land use designation of the Harbor Gateway Community Plan.

The proposed project is also consistent with many objectives and policies of the Harbor Gateway Community Plan and the Citywide General Plan Framework, including to provide an

adequate supply of housing units of various types within each City sub-region to meet the projected housing needs by income level of the future population, make housing available to all persons regardless of social, economic, and ethnic status, address the need for additional low and moderate income housing, provide appropriate amenities for apartment residents, including adequate off-street parking, open space and usable recreational areas and facilities, provide buffer features for new multiple-family developments to improve compatibility with adjacent single-family neighborhoods, encourage multi-purpose and shared use of schools, parks, and other publicly-owned lands and facilities, and improve the integration of housing with public services.

Surrounding Properties

The subject property is adjoined on the east, west and south by additional portions of the Gardena High School campus. The main area of the campus is directly south of the subject site, and includes school structures up to three-stories in height, parking lots and other ancillary facilities. Athletic fields and courts are located on the area to the south that is closest to the subject property. The portion of the campus adjoining the subject site to the east is improved with the school's football stadium, with the bleachers approximately three stories in height, and the area adjoining the subject site to the west is improved with a one-story child care facility.

Properties located to the north of 177th Street, east of Budlong Avenue, and west of Normandie Avenue are within the City of Gardena. The property to the north consists of a plant nursery under high voltage power lines, with a County flood control channel to the north of that. Properties to the west of Normandie Avenue are developed with industrial uses. The nearest single family residential dwellings are located about 300 feet to the east of the subject site, to the east of Budlong Avenue, and about 320 feet to the north, north of the flood control channel. The project is buffered from these single-family areas by the Gardena High School football stadium on the east, and the plant nursery and flood control channel to the north.

177th Street, adjoining the subject property to the north, is a local street dedicated to a width of 44 feet and improved with curb, gutter and sidewalk.

Relevant Cases

CPC 5559 – Approved July 6, 1954 granting a Conditional Use Permit authorizing the location of Gardena High School on the subject property.

Issues

LAUSD has identified this area of the Gardena High School site as not suitable for school use, therefore the proposed project will improve an underutilized area that LAUSD has determined is not needed for educational purposes in the future, in a manner that will provide benefits to and address some needs of the community. The new structures and landscaped open space of the proposed project will be a significant improvement over the current state of the site, and the uses included in the project are less intensive and will create fewer impacts to the surrounding community than some school uses that could be developed on this property.

Although the project proposes 100% affordable housing, there is no density bonus involved. Policies of LAUSD and Bridge Housing, the developer, require affordable housing for the type of financing being sought.

There is expected to be a need for additional housing and affordable housing in Harbor Gateway community in the future. Demographic projections by Southern California Association of Governments (SCAG) 2008 Regional Transportation Plan project a shortfall of approximately

1,000 to 2,000 dwelling units, or 7% to 14% of the total number of dwelling units needed in the entire Harbor Gateway Community Plan area, by the Year 2030. There is also a demonstrable need for affordable housing as DCP demographic data shows the Harbor Gateway Community Plan area is lower than the citywide average for total household income, median household income, median family income, and per capita income.

Residents – A number of issues were raised by residents from the community at the April 30, 2010 public hearing, and in letters and phone calls related to the notice of hearing.

Proposed Density. The residential areas of Gardena surrounding Gardena High School are mostly single-family. This project proposes a significantly higher density that some residents believe will adversely impact the single-family neighborhoods around it. The residents believe the project is unfair to long-term residents who purchased in the neighborhood not expecting a high density multiple residential project to be located nearby.

Subsequent to the public hearing, the applicant has agreed to reduce the project density from 131 units originally proposed to 90 units, in order to reduce the potential impacts. The Gardena High School site is an established higher intensity use in this neighborhood, so the proposed project would create fewer impacts at this location than if located elsewhere in the surrounding neighborhood, and could serve as a transitional use adjacent to the more intensive school use. This proposed project is less intensive and will create significantly fewer impacts than some school uses that could be located on the property. Also, this site is largely buffered from nearby residential areas by other portions of the Gardena High School property to the east, west, and south, a plant nursery and flood control channel to the north, and extensive landscaping and open space on the project site, particularly at the east end where it is closest to single-family dwellings.

Impact of Low Income Housing. Several area residents expressed concern because this project is providing affordable or low-income housing. Statements were made at the public hearing that low income housing residents tend to be more transitory or have different values than long term neighborhood residents.

The City's General Plan and the Harbor Gateway Community Plan both have very strong policies regarding the need for more affordable housing. DCP demographic data also indicates a need for affordable housing in the Harbor Gateway community. This project will not only provide affordable housing in 100% of the 90 apartment units proposed, but will also improve the existing conditions on the site which is currently mostly vacant and under-utilized, and could easily be described as blighted. The project features modern architecture, extensive landscaping, open space and other amenities to be a beneficial addition to the neighborhood.

Parking. Surrounding residents testified that Gardena High School has an existing shortage of available parking for football games and other special events. Some residents also stated that the existing preschool at the southeast corner of 177th Street and Normandie Avenue adds to the parking problem, and people attending events at the school park in local neighborhood even though it is illegal because it is a permit parking district.

The proposed project is not eliminating any existing parking. Therefore, if the on-site parking is adequate for the proposed new uses, their construction should not worsen any existing parking shortage at Gardena High School. The project will provide 148 parking spaces for the 90 residential units, 12 more than the 136 required under the Municipal Code. This approval has been conditioned to require the Joint Use Center to be utilized primarily by project residents and school staff, not as a full-time meeting facility, that any meetings or events involving the general public or any persons other than project residents and Gardena High School staff must be held outside of normal school hours and provide adequate parking for all attendees on the Gardena

High School site, with the availability and location of such parking to be included in the written notice the event, and that youths served by the Juvenile Impact Program facility be brought to the property by bus by the LAPD, with only program staff allowed to drive vehicles to the site.

Height. Some residents testified that three-story buildings are too high for this location, as there are no three-story houses in the neighborhood.

The proposed project has been reduced to 90 units, resulting in two of the apartment buildings being reduced to two stories, although the other two apartment buildings will remain at three stories with a maximum height of 37 feet, 8 inches. These proposed buildings are no taller than the existing football stadium bleachers or a three-story gym building on the school site, which are both relatively near the project location. There are no single-family houses in the immediate vicinity of the proposed apartment buildings, as they will be largely buffered from nearby residential areas by other portions of the Gardena High School property to the east, west, and south, a plant nursery and flood control channel to the north, and the one-story structures and extensive landscaping and open space at the east end of the subject property, where it is closest to single-family dwellings.

School-related Issues. Residents testified at the hearing that some students from Gardena High School cause problems in surrounding residential neighborhood, such as trespassing, noise, litter and trash, graffiti, illegally swimming in private swimming pools, etc. They believe that the proposed project will worsen these problems.

These are existing issues related to the behavior of some students at the high school, and have no relation to this proposed new project. Although the project has nothing to do with causing these problems, it may help to alleviate some of them by locating a viable use on a portion of the school property that is currently mostly vacant, the residential units will establish more “eyes on the street”, and a representative of the applicant stated at the hearing that they will install a security camera to address public safety issues on the property.

Circulation – A number of residents testified at the hearing that there are already significant traffic problems on 177th Street traveling east to Vermont Avenue, because there is no signal at the intersection and traffic backs up leading to long queues, illegal turns, etc., and there are long delays trying to get onto Vermont Avenue from the school and the Emerald Square neighborhood. The residents feel this new project will add even more congestion to this street segment, further exacerbating the problem.

A Traffic Impact Study was completed for the proposed project, which was reviewed by LADOT and approved on January 6, 2010. The study indicated that the proposed project would have a significant impact on this segment of 177th Street, even though there would be no significant impacts at any intersections. An Addendum Traffic Analysis was completed for the reduced project of only 90 units, which showed that while the impact from a 90-unit project on this street segment would be less, having a 12.1% increase in average daily traffic (ADT) compared to 15.1% projected for the original 131 units, the impact nonetheless remains significant.

The Mitigated Negative Declaration for this case imposed Mitigation Measure T-1-MM to require a Neighborhood Traffic Calming Program wherein the project applicant must conduct a traffic monitoring study of 177th Street, east of Budlong Avenue within one year of project opening, to count and monitor traffic volumes on 177th Street to determine how the ADT volumes relate to the Year 2009 (i.e., pre-project baseline) traffic volume count data, and submit the results of the counting and monitoring to LADOT. If the ADT on 177th Street increases more than the LADOT local residential street segment impact criteria, traffic calming measures must be implemented in accordance with a neighborhood traffic calming program to be developed in conjunction with LADOT staff. Components of the neighborhood traffic calming program may include measures

such as speed humps, diverters, turn restrictions, enforcement, geometric changes, signing and marking. This Mitigation Measure has been incorporated as a condition of approval of this case, modified to require the development and implementation of the traffic calming program prior to the project opening, with further monitoring and additional mitigation if necessary after it opens. This will reduce the potential traffic impact on 177th Street to a level of insignificance.

Community Group(s) – A letter was received from President of the Emerald Square HOA in the City of Gardena, which states that the traffic study submitted with the proposed project is inaccurate, and the project poses a threat to their property values and public safety, the area already contends with crime concerns related to Gardena High School, the project site is too small an area to accommodate the proposed number of units and parking spaces, traffic in their area is already very congested because of traffic generated by the high school, and they have requested the City of Gardena to put traffic lights in the area to help reduce the congestion. The concerns raised by this letter are largely identical to the issues raised by residents at the public hearing on April 30, 2010, which are discussed above.

City of Gardena - The City of Gardena submitted a letter prior to the hearing and also had a representative of its Planning Department attend the hearing and give testimony. The City of Gardena raises three main issues regarding the Mitigated Negative Declaration for this project:

Traffic: The City of Gardena objects to the Traffic Impact Study for the project based on four (4) primary concerns:

1. The MND identifies a potential significant impact at 177th Street, east of Budlong Avenue, which is within the jurisdiction of the City of Gardena. The LADOT recommended that the applicant be responsible for contacting the City of Gardena to determine the appropriate means necessary to address the identified potential impact, and if it is determined that mitigation is needed, the applicant be responsible for obtaining LADOT approval of and bear the full responsibility for implementing the mitigation. The City of Gardena believes that the Mitigation Measure T-1-MM (Neighborhood Traffic Calming Program) provided allows the developer to avoid mitigation rather than being required to mitigate identified significant impacts to the satisfaction of the City of Gardena.
2. The method of analysis utilized in the Traffic Impact Study as it relates to Gardena is incorrect, and the actual LOS impacts to are expected to be more severe than anticipated, because the study analyzed the existing LOS for several intersections based on the determination that the intersection approaches provided "functional right-turn lanes", while the City of Gardena does not consider "functional" right-turn lanes in an LOS analysis, and requires the right-turn lane to actually be striped for the exclusive movement of right turns in order to be included in an LOS analysis. Therefore, Gardena wants the LOS reanalyzed for several intersections using its preferred methodology.
3. The Traffic Impact Study analyzed the project based on a build-out year of 2011, while the Initial Study/MND identifies the build-out year as 2012, and Gardena wants a revised analysis completed to determine if this changes any of the impacts.
4. The Traffic Impact Study fails to take into account the impact on the cars turning left into a Park and Ride facility located on the east side of Vermont Avenue, south of Artesia Boulevard, which already impacts the intersection of Artesia and Vermont during the morning commute hours. Gardena believes the additional traffic this project will place on Vermont Avenue may worsen this impact, and this should be addressed by the MND.

Public Safety: While the Los Angeles Police Department (LAPD) will provide police protection services to the project site as it is located within the South Bureau, Harbor Division Region, the City of Gardena states that because the closest LAPD station (Harbor Division Headquarters) is located approximately seven (7) miles south of the project, the Gardena Police Department is often the first responder to emergency calls at the Gardena High School campus, adjacent to the project site. Therefore, and because Gardena predicts that 9-1-1 emergency calls via cell phone will be directed to its Dispatch Center (the South Bay Regional Communications Center), Gardena believes that its Police Department, as the closest agency, will be responding to calls at the project location, and therefore a Public Service Impact Fee should be applied to the project and paid to the City of Gardena to mitigate the impacts on their Police Department and offset additional costs that will result to their city from the project.

Parking: The City of Gardena states that the project will provide a total of 205 parking places, without any separate identification of additional parking spaces for the Joint Use Center or Juvenile Impact Program facility, and the project is inadequately parked as further evidenced by the fact that the developer is requesting a parking variance to reduce the parking by 65 spaces. The parking analysis in the MND is therefore inconsistent with the requested approvals and fails to address the parking deficiency. Single-family homes within the City of Gardena are already adversely impacted by parking from Gardena High School students, and because the project will be severely under-parked due to the variance request to reduce parking by 65 spaces, cars will undoubtedly park on adjacent Gardena streets, creating an enforcement problem for the City of Gardena and further exacerbating impacts to its Police Department.

Staff Response to Issues Raised by the City of Gardena

Traffic:

1. The Mitigation Measure T-1-MM (Neighborhood Traffic Calming Program) in the MND, as incorporated into the conditions of approval of this case, requires the applicant to develop and implement a neighborhood traffic calming program to address the projected impact prior to the project opening, then monitor traffic volumes on 177th Street after it opens, submitting the results to LADOT. If a significant impact continues to exist, based on LADOT standards, the applicant must develop and implement additional neighborhood traffic calming measures in conjunction with LADOT staff to mitigate the impact. In order to address the City of Gardena's concerns, the wording of this condition has been modified such that the applicant is required to develop and implement the neighborhood traffic calming program "in conjunction with LADOT staff and in consultation with the City of Gardena." (emphasis added) That will assure Gardena direct input into the program such that its concerns must be considered by LADOT staff in the development and approval of the neighborhood traffic calming program.
2. As the lead agency for environmental review, the City of Los Angeles is entitled to apply its own thresholds to assess the significance of potential impacts. The method of analysis utilized in the Traffic Impact Study relative to "functional right turn lanes" has been reviewed by LADOT along with the entire Traffic Impact Study, and approved as consistent with the City's established requirements.
3. The Addendum Traffic Analysis prepared for the reduced project of 90 units that is recommended for approval herein utilized a Year 2012 project build-out year to address this concern of the City of Gardena. The results of that analysis show that there remain no significant traffic impacts from the project, except the one potential impact previously identified on 177th Street east of Budlong Avenue, which is less for the 90-unit project, and will still be mitigated to a level of insignificance by Mitigation Measure T-1-MM.

4. Any project-related traffic entering the park-ride lot from Vermont Avenue during the morning commute hours would make a right turn from northbound Vermont Avenue, and not use the southbound left turn lane cited in the letter. Further, any additional traffic on Vermont Avenue related to the project would be counted at other nearby intersections, including Vermont and Artesia and Vermont and 182nd Street. Table B in the Addendum Traffic Analysis shows that the change in Volume to Capacity Ratios attributable to the project on Vermont Avenue in the AM and PM peak hours at intersections to the both the north and south of the park-ride lot will be only 0.002 to 0.005, which is well below the minimum threshold for a significant impact at any level of service. Therefore, there is no need for further study to evaluate potential impacts at the park-ride lot entrance.

Public Safety: The impact of the proposed project to police protection services for both the LAPD and the City of Gardena Police Departments was specifically evaluated by the MND, and the potential impacts were determined to be less than significant.

Parking: Gardena's statement that the project will provide on-site parking "without any separate identification of additional parking spaces for the Joint Use Center or Juvenile Impact Program facility" is incorrect, as the site plan for the proposed project clearly shows the parking spaces for these facilities being located in a separate lot and accessed via a separate driveway from 177th Street. The requested variance would result in reduction in on-site parking of 42 spaces, not 65, in the revised project. The variance is justified by the special nature of these facilities as stated in the findings section of this report. The Joint Use Center will be utilized primarily by project residents or Gardena High School staff that already have on-site parking spaces in the project or on the school property, and the Juvenile Impact Program facility will serve youths that are brought to the site by bus by LAPD. Conditions of approval of this case specifically require that only staff of the Juvenile Impact Program may park on the site, that youths must be bused to the property, and any events or meetings at the Joint Use Center that involve the general public or any persons other than project residents and Gardena High School staff must be held outside of normal school hours, adequate parking for all attendees must be provided on the Gardena High School site, and the availability and location of such parking must be included in the written notice for all such meetings and events. Further, parking is prohibited on 177th Street by the City of Los Angeles, and on Budlong Avenue by the City of Gardena through a permit parking district. These factors and conditions will ensure that there will be no significant parking impacts to the City of Gardena created by the proposed project.

Conclusion

The proposed project will serve a number of community needs on a largely vacant and under-utilized site that LAUSD has identified as not being suitable for school use. The project is also consistent with many objectives and policies of the Harbor Gateway Community Plan and the Citywide General Plan Framework, including to provide an adequate supply of housing units of various types within each City sub-region to meet the projected housing needs by income level of the future population, make housing available to all persons regardless of social, economic, and ethnic status, and to encourage multi-purpose and shared use of schools, parks, and other publicly-owned lands and facilities. The proposed project is consistent with the Public Facilities land use designation because all of the proposed uses serve public purposes and community needs, and are permitted in the PF Zone by conditional use as recommended herein. Demographic projections by the SCAG 2008 Regional Transportation Plan project a significant need for additional housing in Harbor Gateway by the Year 2030, and there is also a demonstrable need for more affordable housing in the community.

The applicant has agreed to reduce the project density from the 131 units originally proposed to 90 units in order to reduce the potential impacts. The project is located more than 300 feet from

nearest single-family dwellings and is buffered from nearby residential areas by the Gardena High School football stadium on the east, and the plant nursery and flood control channel to the north. The Gardena High School site is an established higher intensity use in this neighborhood, so the proposed project would create fewer impacts at this location than if located elsewhere in the surrounding neighborhood, and could serve as a transitional use adjacent to the more intensive school use. This project is less intensive and will create fewer impacts than some school uses that could be located on the property. The proposed three-story buildings are no taller than the existing football stadium bleachers or a three-story gym building on the school site, which are both relatively near the project location.

The Traffic Impact Study for the proposed project, which was approved by LADOT, indicates the proposed project would have a significant impact on 177th Street east of Budlong Avenue, and local residents have testified that there are traffic problems on that street segment. However, Mitigation Measure T-1-MM, that requires a Neighborhood Traffic Calming Program, will reduce the potential traffic impact on 177th Street to a level of insignificance. The traffic study indicates no other significant traffic impacts from the project, and the reduction of the project from 131 to 90 units will further reduce its effect on traffic in the region.

The requested parking variance is justified by the special nature of the Joint Use Center and Juvenile Impact Program facilities. The Joint Use Center will be utilized primarily by project residents or Gardena High School staff that already have on-site parking spaces in the project or on the school property, and the Juvenile Impact Program facility will serve youths that are brought to the site by bus by LAPD. Further, parking restrictions on 177th Street and Budlong Avenue by the cities of Los Angeles and Gardena will protect the surrounding neighborhood. These factors and conditions of approval of this case will ensure that there will be no significant parking impacts to surrounding residential areas caused by the proposed project.

CONDITIONS OF APPROVAL

A. Entitlement Conditions

1. **Site Plan.** The use and development of the subject property shall be in substantial conformance with the site plan, elevations, and floor plans labeled "Exhibit A," stamped and dated June 10, 2010 attached to the subject case file. Minor deviations may be allowed in order to comply with provisions of the Municipal Code, the subject conditions and the intent of the subject permit authorization.
2. **Covenant.** Prior to the issuance of any permits relative to this matter, an agreement concerning all the information contained in these conditions shall be recorded in the County Recorder's Office. The agreement shall run with the land and shall be binding on any subsequent property owners, heirs or assigns. The agreement must be submitted to the Planning Department and Los Angeles Housing Department (LAHD) for approval before being recorded. After recordation, a copy bearing the Recorder's number and date shall be provided to the City Planning Department.
3. All 90 residential apartment units permitted herein shall be restricted to be affordable to residents earning up to 60% of the Area Median Income, and shall remain so restricted for a period of at least 30 years.
4. LAUSD employees working on the Gardena High School site or within a three-mile radius shall be given first right of refusal in leasing the apartment units.
5. The subject property including all associated walkways, parking lots, and other ancillary facilities, shall be maintained in an attractive condition and kept free of trash and debris.
6. The project shall provide full parking as required by the Municipal Code, or at least 148 spaces, whichever is greater, for the residential apartment units.
7. A minimum of 13 parking spaces shall be provided for the Joint Use Center and Juvenile Impact Program facilities, and these parking spaces should be accessed by a separate driveway than the parking for the apartment units.
8. The Joint Use Center shall be utilized primarily by project residents and school staff, and shall not be converted to a full-time meeting facility.
9. At any time the Joint Use Center is utilized for meetings or events involving the general public or any persons other than project residents and Gardena High School staff, such meetings shall be held outside of normal school hours, and adequate parking for all attendees shall be provided on the Gardena High School site. The availability and location of such parking shall be included in the written notice for all such meetings and events.
10. The Juvenile Impact Program facility shall be utilized solely for that program, and shall not be used for other types of meetings or other purposes.
11. The youths served by the Juvenile Impact Program facility shall be brought to the property by bus by the Los Angeles Police Department. Only program staff shall be allowed to drive vehicles to the site.

12. **Landscape Plan.** All areas of the property not covered by buildings, parking, walkways, or other improvements as authorized herein shall be landscaped with trees, shrubs, grass or other ground cover. Prior to the issuance of any building permits, applicant shall submit a final set of Landscape Plans to the satisfaction of the Department of City Planning. Landscape Plans shall be stamped by a Certified Landscape Architect and shall be in compliance with all applicable regulations of the Los Angeles Municipal Code.
13. All landscaped areas shall be irrigated with an automated watering system. The irrigation system shall be illustrated on the Landscape Plan. Landscaping shall be maintained in good health for the life of the project.
14. The project shall provide adequate lighting for the buildings, walkways and parking areas to provide a secure and safe area for the residents and visitors to the site.
15. Lighting shall be directed onto the property and shielded as necessary to prevent glare on adjacent properties.
16. The subject property, including all on-site parking areas, walkways, common areas, open space, and public facilities, shall be patrolled or monitored by licensed security personnel, either by direct patrol and/or the installation and monitoring of one or more security cameras at appropriate locations on the property, so as to provide a safe and secure environment for residents and visitors to the site, and discourage loitering, trespassing, and other criminal activity on and around the subject site. A security plan shall be developed for the subject property in conjunction with LAUSD security staff for Gardena High School and the Los Angeles Police Department.

B. Department of Transportation Conditions

1. A driveway access and circulation plan shall be submitted to LADOT's Citywide Planning Coordination Section (201 N. Figueroa Street, 4th Floor, Station 3; 213-482-7024) for review and approval prior to the issuance of building permits.
2. A construction worksite traffic control plan shall be submitted to LADOT for review and approval prior to the start of any construction work. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties.
3. All construction related-traffic shall be restricted to off-peak hours.

C. Bureau of Engineering Conditions

1. The applicant shall provide dedication of a 5-foot-wide strip of land along the project frontage on 177th Street.
2. Relocate catch basins per B-Permit plan check requirements.
3. Sewer lines exist in Budlong Avenue and Normandie Avenue. Extension of the 6-inch house connection laterals to the new property line may be required. All Sewerage Facilities Charges and Bonded Sewer Fees are to be paid prior to obtaining a building permit.

4. An investigation may be necessary to determine the capacity of the existing public sewers to accommodate the proposed development. Submit a request to the Harbor District Office of the Bureau of Engineering (Sewer Counter) to verify sewer capacity, (310) 732-4677.
5. Submit a parking area and driveway plan to the Harbor District Office of the Bureau of Engineering and the Department of Transportation for review and approval.

D. Mitigation Measures

1. **Light Shielding.** Outdoor lighting shall be designed and installed with shielding, so that the light source cannot be seen from adjacent residential properties. (MM)
2. Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way. (MM)
3. All significant trees (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) on site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. (MM)
4. A Landscape Plan shall be prepared, indicating the location of all replacement trees, to the satisfaction of the decision-maker. Net, new trees, located within the parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements. (MM)
5. Removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. Contact Urban Forestry Division at: 213-485-5675. All trees in the public right-of-way shall be provided per the current standards of the Urban Forestry Division the Department of Public Works, Bureau of Street Services. (MM)
6. Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code Section 86). (MM)
7. If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat the applicant shall:
 1. Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
 2. If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31.
 3. Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the

nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area. (MM)

8. The applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. (MM)
9. **Documentation Reports.** A historic preservation professional qualified in accordance with the Secretary of the Interior's Standards shall be selected to complete a documentation report on the portions of the eligible property to be demolished. The buildings to be demolished shall be documented with archival quality photographs and historic building plans. This documentation, along with historical background prepared for this property, shall be submitted to the library at Gardena High School and/or an appropriate public repository approved by the City of Los Angeles. The documentation reports shall be completed and approved by the City of Los Angeles prior to issuance of demolition permits. (MM)
10. **Review of Agricultural Program.** A historic preservation professional qualified in accordance with the Secretary of the Interior's Standards shall be selected to review all materials held by the Gardena High School, and other sources as may be found, on the history of the agricultural program at Gardena High School. These materials shall be collected in a file made available to the library at Gardena High School and/or an appropriate public repository approved by the City of Los Angeles. The task shall be completed and approved by the City of Los Angeles prior to issuance of demolition permits. (MM)
11. **On Site Commemoration.** An historic preservation professional qualified in accordance with the Secretary of the Interior's Standards shall be selected to prepare an on-site interpretive plan, focusing on the significant historic themes associated with the properties to be demolished as they relate to the broader history of Gardena High School. The plan shall include a commemorative work, such as a mural, photographic display or other suitable interpretive approaches, as approved by the lead agency, and be installed in an appropriate location within the proposed community building. The interpretive plan shall be completed and approved prior to the issuance of building permits for the proposed community building, and shall be installed within one year of occupancy. If the proposed community building is not occupied within two years after the issuance of demolition permits, another suitable temporary or permanent location for the interpretive display shall be determined, subject to the approval of the lead agency. The interpretive display shall remain in public view for a minimum of five years, and if removed, appropriately archived. (MM)
12. **Archaeological Materials.** If any archaeological materials are encountered during the course of project development, all further development activity shall halt and the services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource. The applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study or report.

- 13. Archaeological Report.** Any archaeological survey, study or report required by Measure CR-4 shall be submitted to:

SCCIC Department of Anthropology
McCarthy Hall 477
CSU Fullerton
800 North State College Boulevard
Fullerton, CA 92834 (MM)

- 14. Case Letter.** Prior to issuance of any building permit, the applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered. (MM)

- 15. Paleontological Materials.** If any paleontological materials are encountered during the course of onsite construction, construction activities shall be halted. (MM)

- 16. Paleontologist Review.** If excavation activities go 20 feet or deeper, or if excavation encounters undisturbed basement sediments or if any paleontological artifacts are discovered, the services of a paleontologist shall be secured by contacting the Center for Public Paleontology – USC, UCLA, Cal State Los Angeles, Cal State Long Beach, or the Los Angeles County Natural History Museum to assess the resources and evaluate the impact. (MM)

- 17. Paleontological Study.** If the services of a paleontologist are required, copies of the paleontological survey, study, or report shall be submitted to the Los Angeles County Natural History Museum. (MM)

- 18. Human Remains.** If human remains are unearthed, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will then identify the person(s) thought to be the Most Likely Descendent (MLD) of the deceased Native American, who will then help determine what course of action should be taken in dealing with the remains. (MM)

- 19. Asbestos Containing Materials.** Due to the age of the building being demolished, asbestos-containing materials (ACM) may be located in the structure. Exposure to ACM during demolition could be hazardous to the health of the demolition workers as well as area residents and employees. Prior to the issuance of any demolition permit, the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant that no ACM are present in the building. If ACM are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other State and Federal rules and regulations. (MM)

- 20. Lead-Based Paint Containing Materials.** Prior to issuance of any permit for demolition or alteration of the existing structure(s), a lead-based paint survey shall be performed to the written satisfaction of the Department of Building and Safety. Should lead-based paint materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations. (MM)

21. Soil and Soil Gas Assessment. Soil and Soil Gas assessment shall be conducted in the following areas:

- *In the areas of the site previously used for agricultural purposes*
- *In the vicinity of the clarifier*
- *In the vicinity of the former drainage/pond area*
- *In the vicinity of the former classrooms*

The soil samples shall be analyzed for organochlorine pesticides, chlorinated herbicides, total petroleum hydrocarbons, volatile organic compounds, polychlorinated biphenyls, semi-volatile organic compounds, Title 22 (CAM) metals; the soil gas samples shall be analyzed for volatile organic compounds. A Sampling Strategy Plan shall be prepared and submitted to the LAUSD-OEHS for review and approval at least 72 hours prior to sampling activities. The Sampling Strategy Plan shall include information regarding constituents of concern, a site figure depicting sampling locations, field methods and sampling procedures, analytical methods, a Quality Assurance Project Plan and data validation information to ensure validity of test results. In the event that standard screening levels are exceeded, a Health Risk Assessment using a residential or unrestricted land use scenario will be prepared to evaluate potential health risk effects from environmental contaminants.

In accordance with LAUSD Specification 01440, soils and materials to be imported or exported during excavation, grading, and construction activities must be tested to identify potential hazardous constituents. Test reports will include a summary of sampling locations, activities and test results, site figures, data tables, and analytical results. Test reports must be submitted to LAUSD/OEHS for review and written approval prior to import of soils, and/or prior to shipment of soils offsite for disposal or reuse. Offsite disposal must be conducted in accordance with LAUSD/OEHS requirements and all applicable environmental agency rules and requirements.

If contaminants are detected, the results of the soil sampling shall be forwarded to LAUSD/OEHS, and to the local regulatory agency (City of Los Angeles Fire Department, Los Angeles Regional Water Quality Control Board, or the State of California Environmental Protection Agency Department of Toxic Substances Control). The agency shall review the data and either sign off on the property or determine if any additional investigation or remedial activities are deemed necessary.

If concentrations of contaminants in soil or soil gas warrant site remediation, impacts shall be remediated either prior to construction of structures or concurrent with construction. The contaminated materials shall be remediated under the supervision of an environmental consultant licensed to oversee such remediation. The remediation program shall also be approved by the appropriate regulatory oversight agency, with a copy provided to LAUSD/OEHS. All proper waste handling and disposal procedures shall be followed. Upon completion of the remediation, the environmental consultant shall prepare a report summarizing the project, the remediation approach implemented, and the analytical results after completion of the remediation, including all waste disposal or treatment manifests. The mitigation and remediation efforts may include, but would not be limited to, the following for the specified contaminants:

Methane Gas Mitigation. If a methane mitigation system is required, a subslab system will be designed, installed, and inspected by a qualified methane mitigation engineer following Municipal Code Section 91.7104.2 of the LADBS Methane Code.

Hydrogen Sulfide. If a hydrogen sulfide mitigation system is required, a sub-slab mitigation system will be designed, installed, and inspected by a qualified engineer.

Volatile Organic Compounds. If volatile organic compounds are detected in the soil gas and or soil above the California Department of Toxic Substances Control District's (DTSC) California Human Health Screening Levels (CHHSLs), a sub-slab mitigation system will be designed by a qualified engineer, or, if warranted, the soil with elevated concentrations of volatile organic compounds will be excavated and hauled off site to an appropriate disposal facility.

Pesticides. If pesticides are detected above the CHHSLs, the soil with elevated concentrations of pesticides will be excavated and hauled off site to an appropriate disposal facility.

Metals. If metals are detected above the CHHSLs, the soil with elevated concentrations of metals will be excavated and hauled off site to an appropriate disposal facility.

Polychlorinated Biphenyl (PCB). If PCBs are detected above the CHHSLs, the soil with elevated concentrations of PCBs will be excavated and hauled off site to an appropriate disposal facility.

If, during the soil sampling, groundwater contamination is suspected, or if elevated concentrations of VOCs are detected in the deeper (e.g. 10' to 15' deep) samples, and they are greater than the concentrations of VOCs detected in the shallower (5' to 10' deep) samples, this is indicative of VOCs offgassing from groundwater, and the applicant shall perform a groundwater sampling assessment. If contaminants are detected in groundwater at levels that exceed maximum contaminant levels for those constituents in drinking water, or if the contaminants exceed health risk standards such as Preliminary Remediation Goals, one in one million cancer risk, or a health risk index above 1, then the results of the groundwater sampling shall be forwarded to LAUSD/OEHS and the appropriate regulatory agency. The agency shall review the data and sign off on the property or determine if any additional investigation or remedial activities are deemed necessary. (MM)

- 22. Site Testing for Methane and Hydrogen Sulfide Gases.** Prior to the issuance of a building permit, applicant shall comply with the City Methane Seepage Regulations as outlined in Municipal Code Section 91.7103. Site testing of subsurface geological formations shall be conducted in accordance with the Methane Mitigation Standards. The site testing shall be conducted under the supervision of a licensed architect or registered engineer or geologist and shall be performed by a testing agency approved by the Department of Building and Safety. In addition, site testing shall be conducted for hydrogen sulfide gas in accordance with standard assessment procedures.

The licensed architect, registered engineer or geologist shall indicate in a report to the Department of Building and Safety, the testing procedure, the testing instruments used to measure the concentration and pressure of the methane gas. The measurements of the concentration and pressure of the methane gas shall be used to determine the Design Methane Concentration and the Design Methane Pressure which will be used to determine the Site Design Level. (MM)

23. Explosion/Release (Methane Gas). If the presence of methane gas is confirmed through required site testing, the following measures shall be implemented:

1. *All commercial, industrial, and institutional buildings shall be provided with an approved Methane Control System, which shall include these minimum requirements; a vent system and gas-detection system which shall be installed in the basements or the lowest floor level on grade, and within underfloor space of buildings with raised foundations. The gas-detection system shall be designed to automatically activate the vent system when an action level equal to 25% of the Lower Explosive Limit (LEL) methane concentration is detected within those areas.*
2. *All commercial, industrial, institutional and multiple residential buildings covering over 50,000 square feet of lot area or with more than one level of basement shall be independently analyzed by a qualified engineer, as defined in Section 91.7102 of the Municipal Code, hired by the building owner. The engineer shall investigate and recommend mitigation measures which will prevent or retard potential methane gas seepage into the building. In addition to the other items listed in this section, the owner shall implement the engineer's design recommendations subject to Department of Building and Safety and Fire Department approval.*
3. *All multiple residential buildings shall have adequate ventilation as defined in Section 91.7102 of the Municipal Code of a gas-detection system installed in the basement or on the lowest floor level on grade, and within the underfloor space in buildings with raised foundations. (MM)*

24. Construction Sign Posting. The project applicant shall be required to post a sign informing all workers and subcontractors of the time restrictions for construction activities. The sign shall also include the City telephone numbers where violations can be reported and complaints associated with construction noise can be submitted. (MM)

25. Construction Noise. The project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible. In order to comply with the standards for construction-generated noise set forth in the *L.A. CEQA Thresholds Guide*, the applicant shall implement noise attenuation measures to ensure that noise generated during construction of the project does not exceed existing ambient exterior noise levels by 10 dB or more at the exterior of the Gardena Early Education Center, the Gardena High School and the Moneta Continuation School. When feasible, the applicant shall meet LAUSD exterior noise standards, which specify that exterior noise levels on school property should not exceed 70 dBA L10 or 67 dBA Leq. Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday. (MM)

Examples of noise attenuation measures that could be implemented to comply with the standards for construction-generated noise set forth in the *L.A. CEQA Thresholds Guide* may include:

- *Temporary soundwalls - installing temporary soundwalls to specifications sufficient to achieve the necessary noise attenuation.*
- *Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.*

- *Staging area – provision of staging areas onsite to minimize off-site transportation of heavy construction equipment. These areas would be located to maximize the distance between activity and sensitive receptors. This would reduce noise levels associated with most types of idling construction equipment.*
- *Acoustical shelters – surrounding air compressors and generators used for construction with temporary acoustical shelters.*
- *Sound blankets - covering noise generating equipment with sound blankets.*
- *Diesel equipment mufflers – installing factory-recommended mufflers on diesel equipment and operating diesel equipment with closed engine doors.*
- *Electrically-powered tools and facilities - using electrical power to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or caretaker facilities.*

26. Coordination with Adjacent School Uses. The applicant shall coordinate with the Gardena Early Education Center, Gardena High School and the Moneta Continuation School to schedule construction activities that generate high noise levels (i.e. demolition, clearing, excavation, grading, and foundation/conditioning) at times that would minimize disturbance to students and faculty, to the extent feasible. (MM)

27. Neighborhood Traffic Calming Program. Prior to the issuance of building permits, the applicant shall develop a neighborhood traffic calming program in conjunction with LADOT staff in consultation with the City of Gardena, sufficient to mitigate the projected traffic impact on 177th Street, east of Budlong Avenue, to a level of insignificance. The neighborhood traffic calming program shall be implemented prior to the project opening. The applicant shall also be responsible for conducting a traffic monitoring study of 177th Street within one year of project opening. The results of the counting and monitoring shall be submitted to LADOT, and if a significant impact continues to exist relative to the year 2009 (i.e., pre-project baseline) traffic volume count data, the applicant shall develop and implement additional traffic calming measures, in conjunction with LADOT staff and in consultation with the City of Gardena, until the impact is mitigated to a level of insignificance. Components of the neighborhood traffic calming program may include the following measures: speed humps, diverters, turn restrictions, enforcement, geometric changes, signing and marking. (MM)

E. Standard Environmental Mitigation Conditions

- 1. Aesthetics (Surface Parking).** The following measures are intended to reduce glare:
 - A minimum of one 24-inch box tree (minimum trunk diameter of two inches and a height of eight feet at the time of planting) shall be planted for every four new surface parking spaces.
 - The trees shall be dispersed within the parking area so as to shade the surface parking area and shall be protected by a minimum 6-inch high curb, and landscape. Automatic irrigation plan shall be approved by the City Planning Department.
 - Palm trees shall not be considered in meeting this requirement.
 - The genus or genera of the tree(s) shall provide a minimum crown of 30'-50'. Please refer to City of Los Angeles Landscape Ordinance (Ord. No.170,978), Guidelines K - Vehicular Use Areas.

2. **Rubbish, Debris, Graffiti Control.** In order to minimize the potential for visual impacts relating to the presence of rubbish, debris, and graffiti, the following shall be implemented:
 - All onsite buildings, structures, and portions thereof, shall be maintained in a safe and sanitary condition and good repair, and free from graffiti, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to Municipal Code Section 91.8104.
 - The exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a public street or alley, pursuant to Municipal Code Section 91,8104.15.
3. **Onsite Signage.** The following shall be implemented to ensure that onsite signage does not detract from the appearance of the project site:
 - On-site signs shall be limited to the maximum allowable under the LAMC.
 - Multiple temporary signs in the windows and along the building walls are not permitted.
4. **Landscaping.** To ensure that minimum landscape standards are met, all open areas not used for buildings, driveways, parking areas, recreational facilities, and walks shall be attractively landscaped and maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect to the satisfaction of the lead agency.
5. **Fugitive Dust.** All construction shall comply with the requirements of SCAQMD Rule 403, Fugitive Dust, which requires the implementation of Reasonably Available Control Measures (RACM) for all fugitive dust sources, and the Air Quality Management Plan (AQMP), which identifies Best Available Control Measures (BACM) and Best Available Control Technologies (BACT) for area sources and point sources, respectively.
6. **Staging Area.** Construction contractors shall establish an onsite construction equipment staging area and construction worker parking lot, located on either paved surfaces or unpaved surfaces subjected to soil stabilization treatments, as close as possible to a public highway. Control access to public roadways by limiting curb cuts/driveways to minimize project construction impacts upon roadway traffic operations.
7. **Non-Vehicular Equipment Engines.** Construction contractors shall properly maintain non-vehicular equipment engines to minimize the volume of exhaust emissions.
8. **Electricity.** Construction contractors shall use electricity from power poles, rather than temporary diesel or gasoline powered generators.
9. **Alternative Fuel Sources.** Construction contractors should use onsite mobile equipment powered by alternative fuel sources (i.e., methanol, natural gas, propane or butane) to the extent practical.
10. **Inspection of Equipment.** Construction contractors shall inspect construction equipment prior to leaving the site and wash off loose dirt with wheel washers, as necessary.
11. **Ridesharing/Shuttle.** Construction contractors should provide opportunities for ridesharing or shuttle service for construction workers to the extent practical.
12. **Stationary Air Pollution.** An air filtration system should be installed and maintained with filters meeting or exceeding the ASHRAE Standard 52.2 Minimum Efficiency Reporting

Value (MERV) of 12 for commercial land uses and 11 for residential land uses, to the satisfaction of the Department of Building and Safety.

- 13. Seismic.** The design and construction of the project shall conform to Uniform Building Code seismic standards, which address seismically-induced groundshaking, as approved by the Department of Building and Safety. Building design considerations shall include, but are not limited to: ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements and lateral/vertical loads, removal of unsuitable soil, or any combination of these measures.
- 14. Subsidence.** Prior to the issuance of building or grading permits, the applicant shall submit a geotechnical report prepared by a registered civil engineer or certified engineering geologist to the written satisfaction of the Department of Building and Safety. The geotechnical report shall assess potential consequences of subsidence and include ways to avoid subsidence related impacts, such as the removal and recompaction of and loose soils that may be prone to subsidence as determined by a State of California Registered Civil Engineer.
- 15. Standard Liquefaction Requirements.** The project shall comply with the Uniform Building Code Chapter 18, Division 1, Section 1804.5, *Liquefaction Potential and Soil Strength Loss*, which requires the preparation of a geotechnical report by a registered civil engineer to the written satisfaction of the Department of Building and Safety. The geotechnical report shall assess potential consequences of any liquefaction and soil strength loss, estimation of settlement, or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration.
- 16. Municipal Code Requirements.** The project shall comply with applicable Municipal Code requirements, including Article 4.4 of the Los Angeles Municipal Code, including regulations to control, prevent, and reduce stormwater pollution during construction.
- 17. Construction Toxins.** Environmental impacts may result from the release of toxins into the stormwater drainage channels during the construction of onsite development. Ordinance No. 172,176 and Ordinance No. 173,494 specify Stormwater and Urban Runoff Pollution Control which requires the application of Best Management Practices (BMPs). Applicants must meet the requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) approved by Los Angeles Regional Water Quality Control Board, including the following: (A copy of the SUSMP can be downloaded at: <http://www.swrcb.ca.gov/rwqcb4/>).

 - Reduce impervious surface area by using permeable pavement materials where appropriate, including: pervious concrete/asphalt; unit pavers, i.e. turf block; and granular materials, i.e. crushed aggregates, cobbles.
 - Utilize natural drainage systems to the maximum extent practicable.
 - Control or reduce or eliminate flow to natural drainage systems to the maximum extent practicable.
 - All storm drain inlets and catch basins within the project area must be stenciled with prohibitive language (such as NO DUMPING – DRAINS TO OCEAN) and/or graphical icons to discourage illegal dumping.
 - Signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, must be posted at public access points along channels and creeks within the project area.

- 18. Stormwater Best Management Practices.** Development on the project site shall implement Best Management Practices (BMPs) that have stormwater recharge or reuse benefits. The following are examples of BMPs that may be implemented as appropriate:
- Infiltration basin- captures first-flush stormwater, removes particulate pollutants and some soluble pollutants, and contributes toward recharging groundwater
 - Infiltration trench- similar to an infiltration basin but used for smaller drainage areas
 - Catch basin insert- a device that can be inserted into an existing catch basin design to provide some level of runoff contaminant removal
 - Catch basin screens
 - Pervious pavements- captures runoff by allowing stormwater to infiltrate the surface of pavement layer into a “reservoir” layer
 - Cistern- captures stormwater runoff as it comes down through the roof gutter system
 - Greywater systems
 - Primary (onsite) waste water treatment systems
- 19. Groundwater quantity.** Environmental impacts to groundwater quantity may result from implementation of the proposed project through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations, or through substantial loss of groundwater recharge capacity. The Department of Building and Safety requires, when feasible, that applicants modify the structural design of a building so as not to need a permanent dewatering system. When a permanent dewatering system is necessary, the Department of Building and Safety requires the following measures:
1. *Landscape Irrigation*
 2. *Decorative Fountains or Lakes*
 3. *Toilet Flushing*
 4. *Cooling Towers*
- 20. Soil Cleaning.** Leaks, drips, spills, and contaminated soil shall be cleaned immediately to prevent contamination from entering into the storm drains.
- 21. Cleanup Methods.** Hosing down of pavement at material spills shall be prohibited. Dry cleanup methods shall be used whenever possible.
- 22. Dumpsters.** Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or covered with tarps or plastic sheeting.
- 23. Gravel Approaches.** Gravel approaches shall be used where truck traffic is frequent to reduce soil compaction and limit the tracking of sediment into streets.
- 24. Maintenance.** All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills.
- 25. Enclosures.** Materials with the potential to contaminate stormwater shall be: (1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs.
- 26. Drainage Diversion.** Drainage from roofs and pavement shall be diverted around the trash container areas.
- 27. Trash Container Areas.** Trash container areas shall be screened or walled to prevent off-site transport of trash.

- 28. Runoff Treatment.** Runoff shall be treated prior to release into the storm drain. Three types of treatments are available: (1) dynamic flow separator; (2) filtration or (3) infiltration. Dynamic flow separator uses hydrodynamic force to remove debris, and oil and grease, and is located underground. Filtration involves catch basins with filter inserts. Infiltration methods are typically constructed on-site and are determined by various factors such as soil types and groundwater table.) If utilized, filter inserts shall be inspected every six months and after major storms, and shall be cleaned at least twice a year.
- 29. Parking Lot.** The parking lot area shall include oil and grease separator traps to filter on site contaminants and prevent increased contamination of the City's storm drain system.
- 30. Structural BMPs.** The owner(s) of the property shall prepare and execute a covenant and agreement (Planning Department General Form CP-6770) satisfactory to the Planning Department and Stormwater Division of Bureau of Sanitation binding the owners to post construction maintenance of the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan or as per the manufacturer's instructions.
- 31. RWQCB Permits.** The developer shall obtain all necessary permits from the RWQCB prior to the installation of a temporary and/or permanent dewatering system, if such a system is determined to be necessary for development of onsite development. Procurement of all applicable RWQCB permits will ensure the quality of groundwater discharged into the surrounding storm drain or sewer infrastructure.
- 32. Fire Services.** The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.
- 33. Police Services.** The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to Design Out Crime Guidelines: Crime Prevention Through Environmental Design published by the Los Angeles Police Department's Crime Prevention Section, (213) 485-3134). These measures shall be approved by the Police Department prior to the issuance of building permits.
- 34. School Enrollment.** The applicant shall pay school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the project area.
- 35. School Proximity.** The following measures shall be implemented so as to reduce impacts associated with close proximity to the project:
- The developer and contractors shall maintain ongoing contact with administrator of Gardena High School. The administrative offices shall be contacted when demolition, grading and construction activity begin on the project site so that students and their parents will know when such activities are to occur. The developer shall obtain

- school walk and bus routes to the schools from either the administrators or from the LAUSD's Transportation Branch (323)342-1400 and guarantee that safe and convenient pedestrian and bus routes to the school be maintained.
- The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.
 - Haul route scheduling shall be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past the school during periods when school is in session especially when students are arriving or departing from the campus.
 - There shall be no staging or parking of construction vehicles, including vehicles to transport workers on any of the streets adjacent to the school.
 - Due to noise impacts on the schools, no construction vehicles or haul trucks shall be staged or idled on these streets during school hours.
 - Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

36. Parks Demand. Per Section 17.12-A of the LA Municipal Code, the applicant shall pay the applicable Dwelling Unit Construction Fee for construction of apartment buildings.

37. Water Demand. To minimize environmental impacts related to the cumulative increase in demand on the City's water supplies:

- The project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).
- If conditions dictate, the Department of Water and Power may postpone new water connections for this project until water supply capacity is adequate.

Unless otherwise required, and to the satisfaction of the Department of Building and Safety, the applicant shall install:

- High-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs of these installations.
- Restroom faucets with a maximum flow rate of 1.5 gallons per minute.
- Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)

Unless otherwise required, and to the satisfaction of the Department of Building and Safety, the applicant shall:

- Install a demand (tankless or instantaneous) water heater system sufficient to serve the anticipated needs of the dwelling(s).
- Install no more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute.
- Install and utilize only high-efficiency clothes washers (water factor of 6.0 or less) in the project, if proposed to be provided in either individual units and/or in a common laundry room(s). If such appliance is to be furnished by a tenant, this requirement

shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs of these installations.

- Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance.

In addition to the requirements of the Landscape Ordinance, the landscape plan shall incorporate the following:

- Weather-based irrigation controller with rain shutoff;
- Matched precipitation (flow) rates for sprinkler heads;
- Drip/microspray/subsurface irrigation where appropriate;
- Minimum irrigation system distribution uniformity of 75 percent;
- Proper hydro-zoning, turf minimization and use of native/drought tolerant plan materials; and
- Use of landscape contouring to minimize precipitation runoff.
- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for irrigated landscape areas totaling 5,000 sf. and greater, to the satisfaction of the Department of Building and Safety.

38. Solid Waste Generation. The project applicant shall implement the following measures to reduce potential impacts.

- Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the project's regular solid waste disposal program.
- Prior to the issuance of any demolition or construction permit, the applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the satisfaction of the Department of Building and Safety. The demolition and construction contractor(s) shall only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes.
- To facilitate onsite separation and recycling of demolition and construction-related wastes, the contractor(s) shall provide temporary waste separation bins onsite during demolition and construction. These bins shall be emptied and recycled accordingly as a part of the project's regular solid waste disposal program.

F. Administrative Conditions

- 1. Code Compliance.** Area, height and use regulations of the zone classification of the subject property shall be complied with, except where herein conditions may vary.
- 2. Corrective Conditions.** The authorized use shall be conducted at all times with due regard for the character of the surrounding district, and the right is reserved to the City Planning Commission, or the Director of Planning, pursuant to Section 12.27.1 of the Municipal Code, to impose additional corrective conditions, if in the decision makers opinion, such actions are proven necessary for the protection of persons in the neighborhood or occupants of adjacent property.
- 3. Definition.** Any agencies, public officials or legislation referenced in these conditions shall mean those agencies, public offices, legislation or their successors, designees or amendment to any legislation.

4. **Enforcement.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Department of City Planning and any designated agency, or the agency's successor and in accordance with any stated laws or regulations, or any amendments thereto.
5. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, review or approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning for placement in the subject file.
6. **Project Plan Modifications.** Any correction and/or modifications to the Project plans made subsequent to this grant that are deemed necessary by the Department of Building and Safety, or other Agency for Code compliance, and which involve a change in site plan, floor area, parking, building height, yard or setbacks, building separations, or lot coverage, shall require a referral of the revised plans back to the Department of City Planning for additional review and final sign-off prior to the issuance of any building permit in connection with said plans. This process may require additional review and/or action by the appropriate decision making authority including the Director of Planning, City Planning Commission, Area Planning Commission or Board.
7. **Indemnification.** The applicant shall defend, indemnify and hold harmless the City, its agents, officers, or employees from any claim, action, or proceeding against the City or its agents, officers, or employees to attack, set aside, void or annul this approval which action is brought within the applicable limitation period. The City shall promptly notify the applicant of any claim, action, or proceeding and the City shall cooperate fully in the defense. If the City fails to promptly notify the applicant of any claim, action, or proceeding, or if the City fails to cooperate fully in the defense, the applicant shall not thereafter be responsible to defend, indemnify, or hold harmless the City.

FINDINGS

General Plan/Charter Findings

1. **General Plan Land Use Designation.** The subject property is located within the area covered by the Harbor Gateway Community Plan, a portion of the Land Use Element of the City's General Plan, which was adopted by the City Council on December 6, 1995 (Case No. CPC 94-213-CPU). The Plan map designates the subject property Public Facilities, consistent with the PF Zone. The property is also marked with a symbol on the Plan map designating it as a "Public Senior High School".

The proposed project is consistent with the Public Facilities land use designation of the General Plan, because all of the proposed uses serve public purposes and community needs. These include the proposed Joint Use Facility that will serve both the Gardena High School staff and project residents, and the reconstruction and upgrade of the Juvenile Impact Program facility, which already exists on the site. The proposed residential apartment units will be 100% affordable and will therefore address a need for additional affordable and workforce housing in the community that is referred to repeatedly in the Community Plan text. The apartment units will be specifically intended to provide housing for LAUSD employees working on the Gardena High School site or within a three-mile radius, and these persons will be given preference in leasing the units, as required under the conditions of this approval. All of the proposed uses of this project are permitted in the PF (Public Facilities) Zone either by right or by conditional use approval pursuant to Section 12.24 U 21 LAMC, as is recommended herein. Therefore, the proposed project is consistent with the applicable Public Facilities land use designation of the Harbor Gateway Community Plan.

2. **General Plan Text.** The proposed project is consistent with the following relevant land use objectives, policies and programs of the Harbor Gateway Community Plan text:

Issues and Opportunities

- a. Residential

Preservation and enhancement of the positive characteristics of existing residential neighborhoods while providing a variety of housing opportunities with compatible new housing.

Issues:

- Need to preserve single family neighborhoods.
- Lack of open space and recreation areas in new apartment projects.
- Need for more affordable housing.
- Scale, density and character of multiple housing adjacent to single-family homes.

The proposed project will help to preserve and enhance existing residential and single-family neighborhoods by providing new multiple family housing in a compatible form on a public facility property, rather than by infill at a higher density within an existing residential neighborhood. The project site is buffered from nearby single-family areas by other

existing facilities on the school property, including the football stadium, and a plant nursery and County flood control channel to the north. The project will achieve further compatibility with nearby residential areas through its design, which features extensive landscaping and open space.

The project will address the need for more affordable housing in the community because it is 100% affordable and is required to remain so by covenant as conditioned herein. It will also address the lack of open space and recreation areas in new apartment projects by providing extensive open space, landscaping and recreational amenities, including a fitness center, paseo, gardens, meeting room, joint use facility, and landscaped open space.

Residential

- a. Apartments should be soundproofed and be provided with adequate off-street parking, open space and usable recreational areas.

The proposed project will provide full parking as required by the Municipal Code for the residential apartment units. The requested parking variance is only for the Joint Use Facility and Juvenile Impact Program uses. The apartment units are required to meet the Building Code standard for soundproofing, and the development will feature extensive open space, landscaping and recreational amenities, including a fitness center, paseo, gardens, tot lot, community room, joint use facility, and landscaped open space.

- b. New multiple-family developments located adjacent to single-family neighborhoods should provide a transition in height or other buffer features to protect privacy of adjacent residents.

The project site is buffered from nearby single-family areas by a football stadium and other existing facilities on the school property, a plant nursery and a County flood control channel to the north. It does not directly overlook any single-family areas and will not affect the privacy of their residents. The project's design featuring extensive landscaping and open space will also help to enhance compatibility with nearby residential areas.

- c. Single- and multiple-family housing should be made available to all persons regardless of social, economic, and ethnic status.
- d. Additional low and moderate income housing is needed.

The proposed project satisfies these policies and objectives in that it will be 100% affordable and is required to remain as such by covenant as required under the conditions of approval.

- e. The Plan proposes that the predominant low-density residential character of the Harbor Gateway Community be preserved and that single-family residential neighborhoods be protected from encroachment by other types of use.

The proposed project will help preserve existing low-density and single-family residential neighborhoods by providing new housing in an appropriate location on a public facility property, rather than by infilling at a higher density within existing residential neighborhoods. The project site is buffered from nearby single-family areas by the football stadium and other existing facilities on the school property, and a plant nursery and County flood control channel to the north.

Service Systems

- a. The Plan proposes shared use of existing school and park facilities for recreational and educational uses.

The proposed project would make shared use of the existing school site for a number of public uses, including education and recreation, through the establishment of the Joint Use Facility to serve school staff and residents, the upgrade of the existing Juvenile Impact Program facility on the property, and the landscaped open space, gardens, community room, and other recreational amenities for the project residents.

Coordination Opportunities for Public Agencies

- a. Other Public Facilities

The City should encourage multi-purpose use for other publicly owned lands and facilities.

The project will address the need for additional workforce and affordable housing in the community, reconstruct and upgrade the Juvenile Impact Program facility that currently exists on the school site, establish a new Joint Use Facility to serve the needs of both Gardena High School staff and project residents, and improve a currently underutilized area of the school site with new buildings and extensive open space and landscaping.

3. **The Transportation Element** of the General Plan will not be affected by the recommended action herein. The Traffic Impact Study and Addendum Traffic Analysis prepared for the proposed project showed that impacts to intersections in the project site vicinity would be less than significant. However, impacts related to the street segment of 177th Street east of Budlong Avenue would be potentially significant unless mitigation is incorporated. Therefore, this approval has been conditioned to require the applicant to monitor traffic volumes on 177th Street, and if a significant impact is created, develop and implement a neighborhood traffic calming program in conjunction with LADOT staff and in consultation with the City of Gardena. This will reduce the potential impacts to less than significant levels. The required dedication on 177th Street will assure compliance with this Element of the General Plan and with the City's street improvement standards pursuant to Municipal Code Section 17.05.
4. **The Sewage Facilities Element** of the General Plan will not be affected by the recommended action. Certain improvements are required by the Bureau of Engineering through conditions imposed herein, which will reduce any potential impacts to less than significant levels.
5. **Conditional Use Findings (Joint Public and Private Development in PF Zone)**
 - a. *The proposed location will be desirable to the public convenience or welfare.*

The proposed project will improve an underutilized area that LAUSD has determined is not needed for educational purposes in the future, in a manner that will provide benefits to and address some needs of the community. The new structures and landscaped open space of the proposed project will be a significant improvement over the current state of the site, and the uses included in the project are less intensive and will create fewer impacts to the surrounding community than if school uses were developed on this property.

The project will provide additional housing that is needed in the Harbor Gateway Community. The current Harbor Gateway Community Plan designates acreage in residential land use designations that is expected to accommodate 12,723 dwelling units, as shown by Table I in Chapter III of the Community Plan text. A subsequent analysis by Planning Department staff found that the Plan can accommodate up to 13,699 dwelling units if commercially designated properties in the Plan area are developed with residential units in proportions expected by the analysis. However, recent population projections by the Southern California Association of Governments (SCAG) 2008 Regional Transportation Plan indicate the Harbor Gateway Community Plan area is expected to have a population of 46,490 by the Year 2030. Using the 2030 average of 3.16 persons per household for Harbor Gateway estimated by SCAG, a total of 14,712 dwelling units would be required to accommodate that population. This indicates a projected shortfall of 1,989 dwelling units compared to the residential land capacity of the current Community Plan, or a shortfall of 1,013 units even if all of the dwelling units the Planning staff study expects to be developed in commercial areas are built. This equates to a shortfall of 7% to 14% of the total number of dwelling units needed in the entire Harbor Gateway Community Plan area.

There is also a demonstrable need for affordable housing in the Harbor Gateway Community. The Community Plan Profile on the DCP website shows the Harbor Gateway Community Plan area is lower than the citywide average for total household income, median household income, median family income, and per capita income. This suggests that there is a definite need and market for low to moderate income housing in Harbor Gateway.

The project will include a Joint Use Facility providing meeting space and gardens available to project residents and Gardena High School staff, and it will continue the Juvenile Impact Program that is already established on the site, which provides a community service, and improve it through the provision of new upgraded facilities.

The project site is mostly buffered from nearby residential areas by other portions of the Gardena High School property to the east, west, and south, and a plant nursery and flood control channel to the north, making it a suitable location for other uses that are needed in the community but are more intensive than the mostly low density residential uses that are predominant in the surrounding neighborhoods.

- b. *The proposed project is in proper relation to adjacent uses or the development of the community.*

The Gardena High School site is an established more intensive use in an area that is comprised largely of low density housing. Thus, this site is an appropriate location for the multiple-residential and other public-serving uses proposed in this project. These uses will create significantly fewer impacts at this proposed location than elsewhere within existing nearby residential neighborhoods. In addition, this site is buffered from nearby single-family areas by other existing facilities on the school property, including the football stadium, a child care facility, and by a plant nursery and a County flood control channel to the north.

The parking areas for project residents and the other facilities will be located mostly on the internal areas of the site, adjacent to the school, not facing 177th Street. This will enhance the appearance of the project from the street and minimize any adverse impacts to adjacent residential areas.

- c. *The proposed project will not be materially detrimental to the character of development in the immediate neighborhood.*

The project site is mostly buffered from nearby residential areas by other portions of the Gardena High School property to the east, west, and south, and a plant nursery and flood control channel to the north. The design and landscaping of the proposed project will be a significant improvement over the current state of the site, and the uses included in the project are much less intensive and will create fewer impacts on the surrounding community than if school uses were developed on this property. This approval has been conditioned to require mitigation of all potential environmental impacts identified through the Initial Study.

- d. *The proposed project will be in harmony with the various elements and objectives of the General Plan.*

The proposed joint public and private development is consistent with numerous objectives and policies of the Harbor Gateway Community Plan and the Citywide General Plan Framework, including the following:

Harbor Gateway Community Plan

Residential

- a. Preservation and enhancement of the positive characteristics of existing residential neighborhoods while providing a variety of housing opportunities with compatible new housing.
- b. Apartments should be soundproofed and be provided with adequate off-street parking, open space and usable recreational areas.
- c. New multiple-family developments located adjacent to single-family neighborhoods should provide a transition in height or other buffer features to protect privacy of adjacent residents.
- d. Single- and multiple-family housing should be made available to all persons regardless of social, economic, and ethnic status.
- e. Additional low and moderate income housing is needed.
- f. The Plan proposes that the predominant low-density residential character of the Harbor Gateway Community be preserved and that single-family residential neighborhoods be protected from encroachment by other types of use.

Service Systems

- a. The Plan proposes shared use of existing school and park facilities for recreational and educational uses.

Coordination Opportunities for Public Agencies

- a. The City should encourage multi-purpose use for other publicly owned lands and facilities.

General Plan Framework

Land Use

- a. Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.
 - 1) Policy 3.2.2: Establish, through the Framework Long-Range Land Use Diagram, community plans, and other implementing tools, patterns and types of development that improve the integration of housing with commercial uses and the integration of public services and various densities of residential development within neighborhoods at appropriate locations.
- b. Objective 3.13.3: Encourage the inclusion of public service uses (e.g., day and elder care, community meeting rooms, and recreational facilities), school classrooms, cultural facilities (museums and libraries), and similar uses in mixed-use structures.

Housing

- a. Goal 4A: An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.
 - 1) Objective 4.1: Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City subregion to meet the projected housing needs by income level of the future population.
 - 2) Policy 4.1.1: Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within each City subregion to meet the twenty-year projections of housing needs.
- e. *Benefits are provided to the public, and the benefit accruing from the project is sufficient to outweigh any impairment of the public interest that may be created by the public agencies' proposed use of the land.*

The project will provide affordable and workforce housing that is needed in the community. It will also continue the Juvenile Impact Program established on the Gardena High School site and improve it with the provision of new upgraded facilities. The Joint Use Center will provide space for meetings and other special events, programs or needs by Gardena High School.

The proposed project provides a greater benefit to the public than would be provided if the project site were developed similarly to the surrounding properties, which are mostly single-family residential, because it provides significantly more dwelling units and associated amenities, more community-serving uses, and it addresses the need for affordable housing in the community. It also provides a utilization of the site that is much more beneficial to the public than the current state of the property, which is largely vacant and underutilized. LAUSD has determined that this site is not needed for educational use in the future due to demographic trends and the construction of other new schools in the region.

This conditional use approval authorizes the apartment buildings permitted herein to be up to three-stories or 37 feet, 8 inches in height, in lieu of the 30-foot maximum height permitted in Height District 1XL, pursuant to Section 12.24 F of the Municipal Code. The additional height permitted is less than eight (8) feet, and is appropriate in that it allows the residential units to be sited in a more compact and efficient manner on the subject property, which will improve the feasibility of the project to provide affordable housing and permit more open space, landscaping and other amenities that benefit residents and other users of the project, and enhance its compatibility with the adjacent high school and the surrounding neighborhood. The additional height will not adversely impact any surrounding properties as it is no taller than other existing structures nearby on the school site, including the stadium bleachers and the gym, and the project is located more than 300 feet from the nearest residential areas and is buffered from them by portions of the school site and other facilities.

This approval also authorizes a reduction of site for Case No. CPC 5559, the conditional use permit that authorized the construction of Gardena High School in 1954, permitting a change of use for this northerly portion of the school site from a high school use to the proposed joint public-private development recommended for approval herein. The reduction of site and change of use are justified because: 1) the property involved is currently mostly vacant and is utilized minimally for school purposes; 2) LAUSD projections indicate Gardena High School is expected to have a significant decrease in enrollment in future years, due to demographic trends and the construction of other new schools in the region; 3) LAUSD has identified the subject portion of the school site as being not needed or appropriate for school use; and 4) this will improve the currently vacant and underutilized site by establishing viable uses and facilities that benefit the community. It should also be noted that the structures approved herein will be constructed on a 99-year lease, thus LAUSD still owns and controls the future use on the subject property, should it be needed for school use in the future.

6. Zone Variance Findings

- a. *The strict application of the provisions of the zoning ordinance would result in practical difficulties or unnecessary hardships inconsistent with the general purposes and intent of the zoning regulations.*

The subject property is part of school site and has limited area. It is desirable to incorporate as much open space and landscaping as possible within the project to make it more green and attractive, to provide appropriate recreational amenities to residents, school staff and others using the facilities, and to buffer the site from and enhance its compatibility with surrounding properties.

The Municipal Code considers the Joint Use Center and Juvenile Impact Program facility as places of assembly, thereby requiring one parking space per each 35 square feet of floor area. However, the Joint Use Center will be utilized primarily by project residents and school staff. Therefore, the requirement of full parking for it as a place of assembly would effectively require duplicate parking spaces for residents and staff that already have parking spaces provided on-site. The Juvenile Impact Program facility will generate very limited parking demand, as the youths served by the facility are bused in by the LAPD. Thus, requiring full parking for it as a place of assembly is unnecessary since most persons using the facility will be bused in.

Requiring the additional parking spaces for the Joint Use Center and Juvenile Impact Program facility as places of assembly would reduce the amount of landscaping, open space, and other facilities to benefit the project residents, the staff and students of Gardena High School, and the general public. As such, it constitutes a hardship and would reduce the public benefits of the proposed project.

- b. *There are special circumstances applicable to the subject property such as size, shape, topography, location or surroundings that do not apply generally to other property in the same zone and vicinity.*

The subject property is unique in that it is owned by LAUSD and located on a portion of an existing school site that is currently underutilized. Further, LAUSD has determined this portion of the Gardena High School site will not be needed for educational purposes in the future due to demographic trends and other new schools being constructed in the region. The Juvenile Impact Program facility is an existing community-serving use on the site that is being upgraded. The project's location on the school site creates the availability of additional parking elsewhere on the school grounds that can be utilized when these facilities are used for events attended by the general public. Also, the unique nature of the Joint Use Center and Juvenile Impact Program facilities will result in very limited demand for on-site parking related to these facilities.

- c. *The variance is necessary for the preservation and enjoyment of a substantial property right or use generally possessed by other property in the same zone and vicinity but which, because of the special circumstances and practical difficulties or unnecessary hardships, is denied to the property in question.*

The proposed project is a multi-use development that is unique and not directly comparable to any other land uses located in the general vicinity. Because the Joint Use Center will be utilized primarily by project residents and school staff, the requirement of full parking for it as a place of assembly would effectively require duplicate parking spaces for residents and staff that already have parking spaces provided on-site. The requirement of significant parking for the Juvenile Impact Program facility would require parking for youths that are bused in by the LAPD. Requiring those additional parking spaces would reduce the amount of landscaping, open space, and other facilities to benefit the project residents, the staff and students of Gardena High School, and the general public, thereby reducing the public benefits of the proposed project.

- d. *The granting of the variance will not be materially detrimental to the public welfare, or injurious to the property or improvements in the same zone or vicinity in which the property is located.*

The special nature of these facilities and the conditions of approval herein will ensure that no adverse impacts will occur to the neighborhood. The Joint Use Center will be utilized primarily by project residents and school staff. The Juvenile Impact Program facility will generate very limited parking demand, as the youths served by the facility are bused in by the LAPD. This approval has been conditioned to require youths served by the Juvenile Impact Program facility to be brought to the property by bus by the LAPD, with only program staff allowed to drive vehicles to the site. The approval has been further conditioned to require adequate public parking to be provided on the Gardena High School site for any meetings or events involving the general public or any persons other than project residents and Gardena High School

staff, that such events be held outside of normal school hours, and that the availability and location of such parking be included in the written notice for all such meetings and events.

- e. *The granting of the variance will not adversely affect any element of the General Plan.*

The variance is necessary to enable the feasibility of the proposed project and its associated public benefits, which is consistent with provisions of the Harbor Gateway Community Plan and the General Plan Framework to encourage multi-purpose and shared use of schools, parks, and other publicly owned lands and facilities. The variance will also permit the project to incorporate more open space and landscaping to address policies of the Community Plan for multiple residential projects to be buffered from and compatible with adjacent single-family neighborhoods, and incorporate usable recreational areas and open space.

7. Site Plan Review Findings.

- a. *The project complies with all applicable provisions of this Code and any applicable Specific Plan.*

The Project complies with all zoning requirements of the Municipal Code relative to the PF zone that exists on the subject property, except as varied by this action.

The purpose of the PF (Public Facilities) Zone on the subject property, as stated in Section 12.04.09 of the Municipal Code, is “to provide regulations for the use and development of publicly owned land in order to implement the City’s adopted General Plan”. The proposed project is consistent with this purpose and intent in that the property is owned by LAUSD and is proposed to be developed with uses that are public serving and/or that address community needs. These uses are permitted in the PF Zone as a joint public and private development for a project having uses more intensive than those permitted in the most restrictive adjoining zones, through conditional use approval pursuant to 12.24 U 21 of the Code, subject to a finding that the project provides benefits to the public. The required conditional use permit and public benefit finding are recommended for approval herein.

Height District 1XL on the subject property limits building height to a maximum of two (2) stories and/or 30 feet. The proposed residential buildings in this project are higher with a three (3) story, 37 foot, 8-inch height, which is authorized through the conditional use approval pursuant to Section 12.24 F of the Municipal Code. No specific floor area ratio (FAR) is specified for PF Zone, but provisions of the 1XL height district would allow an FAR up to at least 2.0 as a practical matter. The total proposed FAR for the residential portion of the project would be 0.58, the Joint Use Center and Juvenile Impact Program facilities would have a total FAR of 0.10.

The proposed project complies with the parking requirements of the Municipal Code except as varied herein. The residential component requires 136 parking spaces for the 90 units proposed, and will provide 148 spaces. The Joint Use and Juvenile Impact Program facilities have reduced parking of 13 spaces in lieu of approximately 55 spaces required by Code, through the approval of a variance herein. The variance authorizing reduced parking for these facilities is justified by special circumstances concerning the nature of these uses, that they will serve primarily project residents and Gardena High School staff that already have parking on site, and therefore will

generate minimal additional parking demand, and approval of the variance allows for more landscaping, open space and gardens that enhance the project and improve its compatibility with the adjacent school site and surrounding residential areas.

The subject property is not located within the area of any adopted Specific Plan.

b. The project is consistent with the General Plan.

The proposed project is consistent with many objectives and policies of the Harbor Gateway Community Plan and the Citywide General Plan Framework, including to provide an adequate supply of housing units of various types within each City sub-region to meet the projected housing needs by income level of the future population, make housing available to all persons regardless of social, economic, and ethnic status, address the need for additional low and moderate income housing, provide appropriate amenities for apartment residents, including adequate off-street parking, open space and usable recreational areas and facilities, provide buffer features for new multiple-family developments to improve compatibility with adjacent single-family neighborhoods, encourage multi-purpose and shared use of schools, parks, and other publicly-owned lands and facilities, and improve the integration of housing with public services.

c. The project is consistent with any applicable adopted Redevelopment Plan.

The subject property is not located within the area of any adopted Redevelopment Plan.

d. The project consists of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements, which is or will be compatible with existing and future development on neighboring properties.

The Project consists of pertinent improvements which will be compatible with the existing and future developments on the neighboring properties. The properties directly adjacent to the project site consist of additional areas of the Gardena High School campus on the east, west and south. The property to the north consists of a plant nursery under high voltage power lines, with a County flood control channel to the north of that. Properties to the west of Normandie Avenue are developed with industrial uses. The nearest single family residential dwellings are located about 300 feet to the east of the subject site, on the east side of Budlong Avenue, and about 320 feet to the north, north of the flood control channel. The project is buffered from these single-family areas by the Gardena High School football stadium on the east, and the plant nursery and flood control channel to the north. The following Project elements will be consistent both with existing and future development on the Property and on neighboring properties.

Building Design. The project consists of four (4) residential apartment buildings, two with three stories and two with two stories, and two other one-story buildings that will house community facilities, primarily meeting rooms. The buildings are all located adjacent to 177th Street. The three-story buildings are no higher than other structures on the Gardena High School campus, including the football stadium bleachers, which are located adjacent to the project site to the east, and a three-story classroom building located slightly farther south on the campus. The buildings feature a modern architectural design that incorporates complementary colors of dark red, gray and

brown. The location of residential buildings adjacent to 177th Street will help address public safety concerns expressed at the hearing by providing eyes on the street.

Parking Facilities. The Project provides 148 parking spaces for the residential units, which exceeds the 136 spaces required under the LAMC. Thirteen (13) spaces are provided for the Joint Use Center and Juvenile Impact Program facilities, through a variance approved herein. The LAMC would require approximately 55 parking spaces for these facilities as places of assembly. The variance for reduced parking is justified because these uses will generate minimal additional parking demand. The Joint Use Center will be used primarily by project residents and Gardena High School staff that already have parking on site, and the Juvenile Impact Program will serve youths that are bused in by the Los Angeles Police Department.

The residential parking will be primarily in carports located adjacent to the apartment buildings, with some additional uncovered spaces at the rear of the property. Parking for the Joint Use Center and Juvenile Impact Program facilities will be in an open parking lot between the two buildings. Access to all parking areas is from 177th Street, via two separate driveways into the residential parking, with a third separate driveway entrance for the Joint Use Center and Juvenile Impact Program parking lot only. Most of the parking is located on the interior and/or rear areas of the property, which will improve the appearance of the project from the street.

Lighting. This approval has been conditioned to require the project to provide adequate lighting for the buildings, walkways and parking areas to provide a secure and safe area for the residents and visitors, and for the lighting to be directed onto the property and shielded as necessary to prevent glare on surrounding properties.

Landscaping and Open Space. The Project will include a substantial amount of on-site landscaping and open space, including landscaped courtyards, walkways and paseos, community gardens, a tot lot, and other landscaped open space areas. The extensive open space and landscaping will help ensure that the project will be compatible with the surrounding school campus and residential neighborhood.

- e. *The project incorporates feasible mitigation measures, monitoring measures when necessary, or alternatives identified in the environmental review which would substantially lessen the significant environmental effects of the project, and/or any additional findings as may be required by CEQA.*

A Mitigated Negative Declaration, ENV-2009-4170-MND, has been prepared for this project. This approval has been conditioned to require the implementation of and adherence to all mitigation measures determined to necessary by the Initial Study to assure that all potential environmental impacts related to the Project are mitigated to a level of insignificance. Mitigation measures have been required to address potentially significant impacts related to aesthetics, biological resources, cultural resources, hazards/hazardous materials, noise, transportation/traffic, and mandatory findings of significance.

- f. *The project provides its residents with appropriate type and placement of recreational facilities and service amenities in order to improve habitability for the residents and minimize impacts on neighboring properties where appropriate.*

Almost all of the units will have private patios or decks. Common area facilities will include a tot lot, fitness center, community room, barbecue facilities, and open space paseos and courtyards. Residents will also have access to a joint use center and

gardens on same site. In addition, the property will have extensive landscaping, trees, shrubs and other ground cover over almost all areas of the site not covered by buildings, parking, or walkways.

The project will minimize impacts on neighboring properties because it is buffered from nearby residential areas to a large extent by other portions of the Gardena High School property to the east, west, and south, and a plant nursery and flood control channel to the north. The project also features extensive landscaping and open space, particularly at the east end where it is closest to single-family dwellings, and is designed with the parking areas mostly in the interior part of the site adjacent to the school. In addition, the approval has been conditioned to require mitigation of all potential environmental impacts identified through the Initial Study.

8. Environmental. A Mitigated Negative Declaration (ENV-2009-4170-MND) was prepared for the proposed project. On the basis of the whole of the record before the lead agency including any comments received, the lead agency finds that, with imposition of the mitigation measures described in the MND, there is no substantial evidence that the proposed project will have a significant effect on the environment. The attached Mitigated Negative Declaration reflects the lead agency's independent judgment and analysis. The records upon which this decision is based are with the Environmental Review Section of the Planning Department in Room 750, 200 North Spring Street. The City Planning Commission, hereby, adopts the Mitigated Negative Declaration, and imposes the mitigation measures shown in that document on this approval.

PUBLIC HEARING AND COMMUNICATIONS

Summary of Public Hearing Testimony and Communications Received

A Public Hearing on this matter was held in Room 1020, City Hall, on Friday, April 30, 2010, at 10:00 AM.

1. Present: Approximately 25 people attended.
2. Speakers: 3 in support; 7 in opposition.

Public Hearing Testimony Notes

SPEAKERS COMMENTS SUPPORTING THE PROJECT:

- LAUSD has identified this as an area not suitable for school use, therefore it is appropriate to develop it for other uses.
- The project will create workforce housing for teachers and other workers in the area.
- The project provides a number of benefits to the City, including affordable housing, innovative architecture, open space, and activation of a currently underutilized property.
- This is an amenity-laden project.
- There is public transit nearby.
- The project residents will put “eyes on the street” to improve public safety on 177th Street
- This development would improve the current blighted conditions on the site.
- The traffic study for the project has been reviewed and approved by LADOT.
- The applicant has met and tried to work with the City of Gardena, the Neighborhood Council and its Planning Committee, the 186th Street Homeowners Association, Emerald Square Homeowners Association, and the Chamber of Commerce.
- Bridge Housing has an established track record of being a good neighbor.

SPEAKERS WITH COMMENTS OPPOSING THE PROJECT

- The area already has significant traffic problems on 177th Street traveling eastbound between Budlong and Vermont, and this project will exacerbate those problems.
- Gardena High School currently creates parking problems in the surrounding neighborhood during football games, graduation, and other special events.
- Three-story buildings are too high for this neighborhood; it has no three-story houses.
- The surrounding neighborhood in Gardena is virtually all single-family; this project is too dense and out of character for the area.
- We do not want low income housing in this community; it brings in a more transitory population with different values than long-term residents.
- The Gardena High School already causes a lot of congestion and traffic in the vicinity; this project with its high density will make the situation even worse.
- There are public safety concerns and crime in the local neighborhood caused by some of the high school students, such as trespassing, graffiti, vandalism, etc., and this project would worsen these problems.
- This project is unfair to the established residents of the community, many of whom would not have purchased here if they knew a project like this would come into the area.
- The City of Gardena wants traffic mitigation put in before the project is built, not after, and the project will also create police and parking impacts to the City of Gardena.
- This project is surrounded by the City of Gardena, even though it is in Los Angeles.

THERE WERE NO SPEAKERS WITH GENERAL COMMENTS.

Communications Received

LETTERS SUPPORTING THE PROJECT

Staff has been provided a copy of a letter from Councilmember Janice Hahn to the developer indicating support for the reduced project of 90 dwelling units. The councilmember stated that the project is an innovative urban infill strategy that can help to address the need for more affordable housing in the local community.

LETTERS OPPOSING THE PROJECT

Four (4) letters were received (all via e-mail) in opposition to the project. One of the letters is from the City Manager of Gardena regarding several concerns their city has with the proposed project. The Gardena letter is discussed extensively in the Analysis section of this report. The other letters are mostly from residents in the surrounding neighborhood. Points raised in these letters are generally summarized below:

- The proposed project will hurt property values in the surrounding neighborhoods
- The project will worsen existing crime problems related to Gardena High School
- The project site is too small to accommodate the number of units and improvements that are proposed
- Traffic in this neighborhood is already very congested due to the high school, and this project will make it even worse

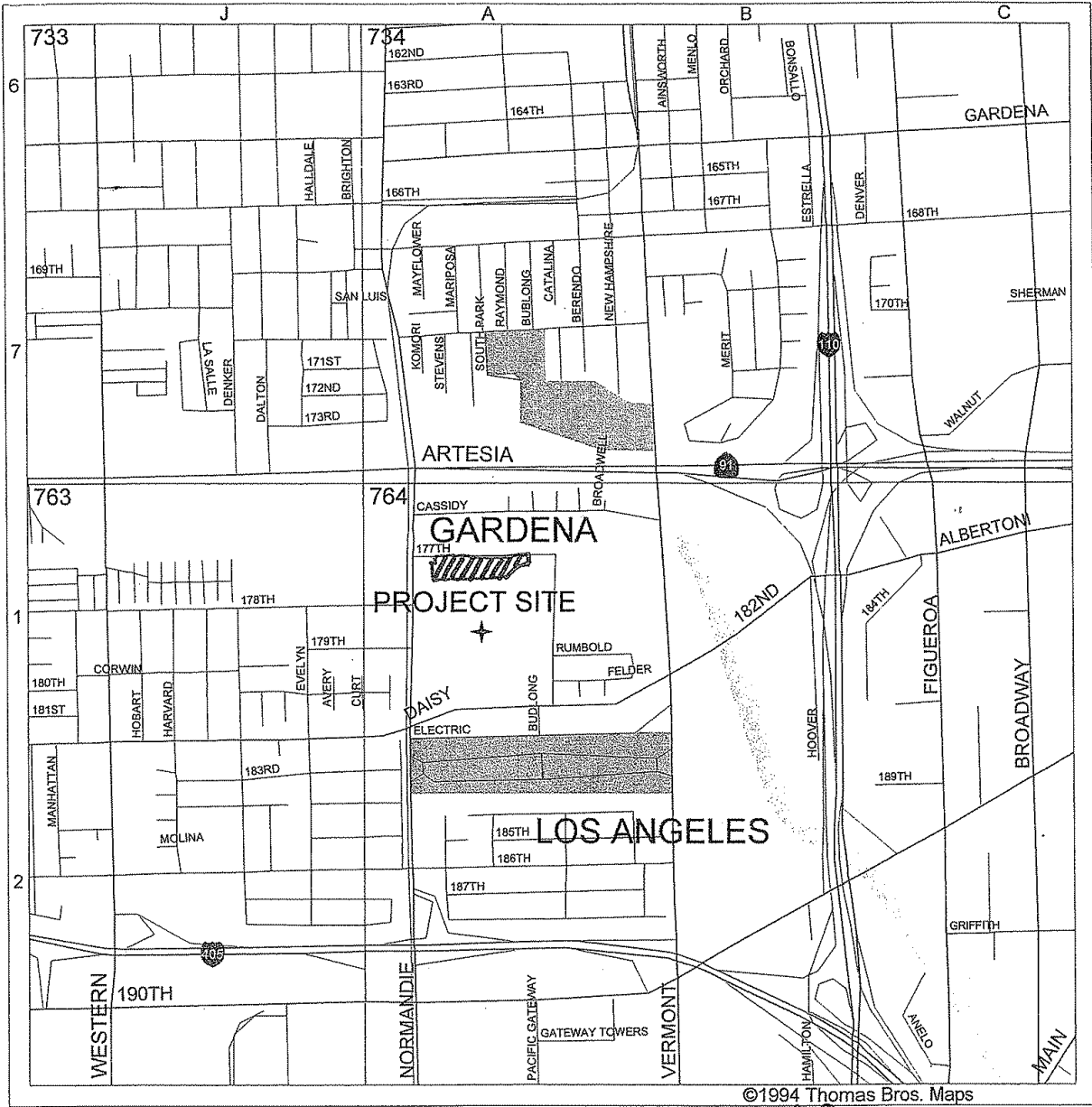
LETTERS WITH GENERAL COMMENTS

One letter with general comments was received via e-mail. The letter states that a full environmental review is needed for this project, addressing all elements of the Checklist, including proximity to a school, methane gas, liquefaction, water quality, and the Elements of the General Plan.

Staff Response to Issues Raised:

- Staff believes the proposed project and density are appropriate for a transitional use adjacent to the school site, given the nature of the subject property and the surrounding land uses.
- The proposed new development will be a significant improvement over the current vacant underutilized nature of the subject property.
- The City's General Plan, Harbor Gateway Community Plan, and City and State law all have very clear objectives and policies in support of providing affordable housing, and the demographic data for Harbor Gateway projects a need for significant additional housing in the future.
- The traffic impacts of the proposed project will be less than significant, except on 177th Street east of Budlong Avenue, based on the Traffic Impact Study, and that location will be mitigated by a Neighborhood Traffic Calming Program required to be developed and implemented in conjunction with LADOT staff and in consultation with the City of Gardena, under the conditions of approval.
- Parking impacts will not occur to surrounding neighborhoods due to the special nature of the Joint Use Center and Juvenile Impact Program facilities, the prohibition of parking on streets surrounding the subject property, and the recommended conditions of approval.

- The objections of the City of Gardena to the Mitigated Negative Declaration regarding traffic and parking are addressed above. The MND specifically studied impacts to police services, and those impacts were determined to be less than significant.
- The existing crime problems related to some Gardena High School students are in no way related to the proposed project. However, the project may help to reduce crime in the area by providing additional security in accordance with the conditions of approval, and because the residents will put more eyes on the street.
- The full environmental review requested in one letter, addressing all elements in the Checklist, including proximity to a school, methane gas, liquefaction, water quality, the Elements of the General Plan, etc., has been completed and these issues are addressed within the Mitigated Negative Declaration/Initial Study. The letter indicates the writer has not reviewed the full document.

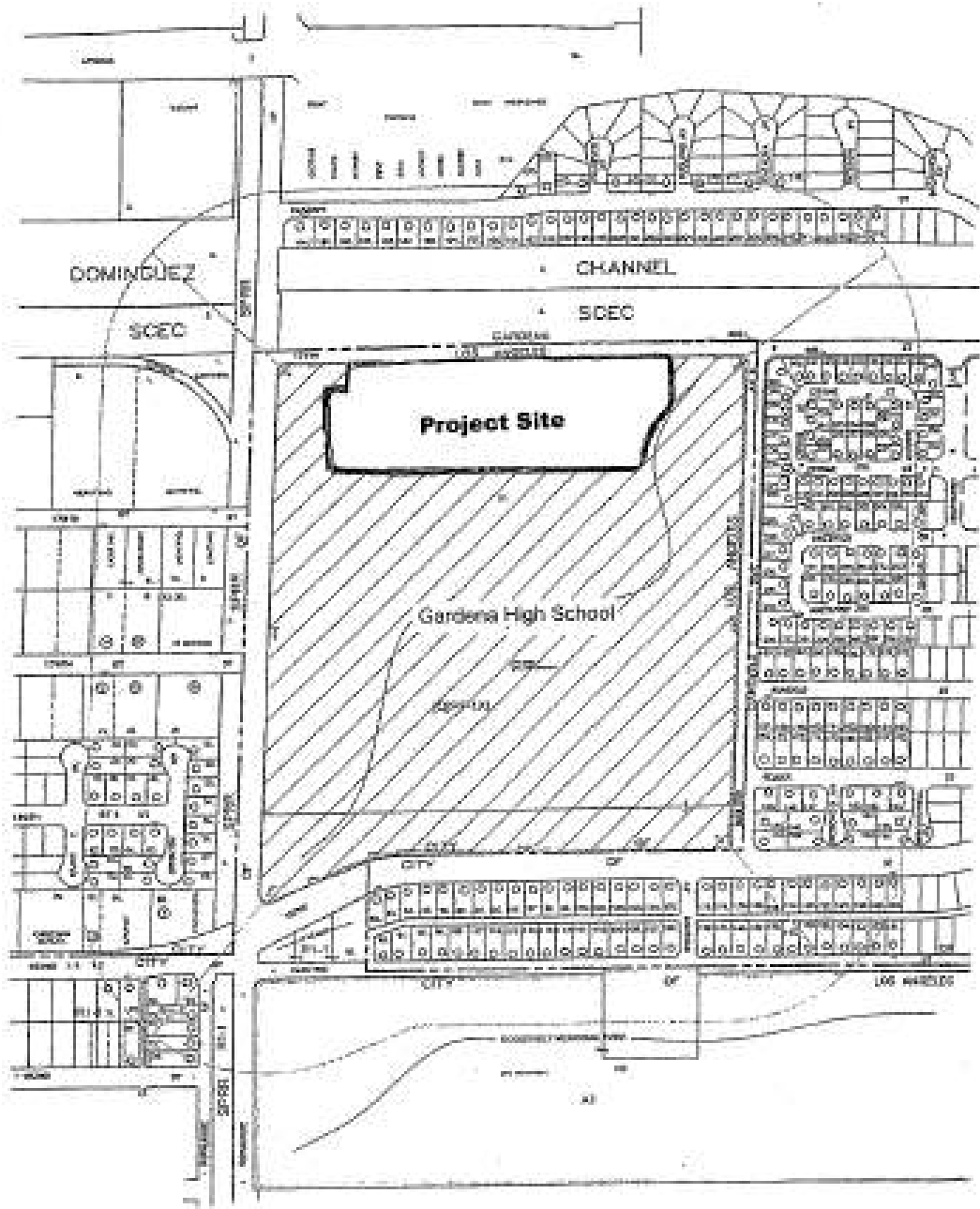


CPC 2009 4168

VICINITY MAP

SITE : 1302 W. 177TH STREET

GC MAPPING SERVICE, INC.
3055 WEST VALLEY BOULEVARD
ALHAMBRA CA 91803
(626) 441-1080, FAX (626) 441-8850
GCMAPPING@RADIUSMAPS.COM



LEGAL: LOTS 1 & 2, TRACT NO. 15875
CONDITIONAL USE PERMIT
SITE PLAN REVIEW
ENVIRONMENTAL ASSESSMENT

C.O. 15
 C.T. 8032.00
 P.A. HARBOR GATEWAY

GC MAPPING SERVICE, INC.
 3055 WEST VALLEY BOULEVARD
 ALHAMBRA CA 91803
 (626) 441-1030 FAX (626) 441-8852
 gcmapping@rackusmaps.com

CASE NO.
 DATE: 12-17-2009
 SCALE: 1" = 100'
 USES: FIELD
 DIM: 063 B 197, 066 B 197,
 063 B 193
 Y.B. PAGE 704 GRID A-1

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**AERIAL PHOTOGRAPH OF GARDENA HIGH SCHOOL
AND SURROUNDING AREAS**

