

MEMORANDUM

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From: Michele Finneyfrock, Project Manager, Dudek
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Subject: The View Residential Project Final Environmental Impact Report – Supplemental Errata
Date: August 26, 2025

Introduction

A Final Environmental Impact Report (Final EIR) for The View Residential Project (Project), dated April 2025, was published on the County of Los Angeles Department of Regional Planning (County) website in April 2025. This Final EIR is hereafter referred to as the “April 2025 Final EIR” or the “Final EIR” throughout this memorandum. The Final EIR will be considered for certification by the Regional Planning Commission at a public hearing currently scheduled for September 10, 2025.

As further detailed in the Draft EIR, the Project has been under review by the County since 2015. The Regional Planning Commission approved The View Residential Project (Project No. R2015-01232-(2) the “2015 View Project”) and adopted the Mitigated Negative Declaration (MND) and Mitigation Monitoring and Reporting Program (MMRP) prepared by the County for the Project in 2017. Subsequent to these actions, the 2015 View Project was appealed to the Los Angeles County Board of Supervisors (Board of Supervisors or Board). The Board of Supervisors denied the appeal while upholding the Regional Planning Commission’s previous approval of the 2015 View Project and adoption of the MND and MMRP.

Following the Board’s denial of the appeal and the filing of the NOD, a Petition for Writ of Mandate was filed by the petitioner, United Homeowner’s Association (UHA) in the Los Angeles County Superior Court (Court), Case No. BS172990. In it, UHA challenged the County’s approval of the 2015 View Project and adoption of the MND and MMRP on several grounds. The Court found that although the MND did satisfy most requirements of CEQA, it did not fully satisfy the requirements of CEQA as to impacts to traffic and circulation. As a result, the Court set aside the County’s approval of the 2015 View Project and adoption of the MND and MMRP. A Court Order was issued to clarify the finding that an Environmental Impact Report (EIR) must be completed for the intended project.

The Court gave specific direction on the EIR to be prepared. The Court determined that the County shall prepare an EIR in full compliance with the requirements of CEQA as to traffic and circulation only. The Court identified that the County satisfied the requirements of CEQA in relation to all other environmental topics addressed in the MND, including the specific areas that the petitioner also challenged (aesthetics, air quality, greenhouse gas emissions, and land use and planning). The Court found that the EIR to be prepared need not include those issues (i.e., all topics other than traffic and circulation) for which the record justifies the County’s actions and determinations. As

such, based on direction from the Court, an EIR was prepared to address the potential for the proposed Project to result in traffic and circulation impacts. The Project that is currently proposed has remained unchanged compared with the proposed development analyzed in the MND. Thus, the Project evaluated in the Draft and Final EIR is the same as the previously contemplated development, with the exception of proposed pedestrian and sidewalk improvements along Overhill Drive, which are discussed in the April 2025 Final EIR.

Given the extensive history of the Project, the County's environmental analysis has been spread across various CEQA documentation over a course of 10 years. As such, the Draft EIR did not include information pertaining to anticipated existing water infrastructure upgrades that will be necessary to serve the Project as proposed, and will comply with all applicable code requirements. The purpose of this memorandum is to provide clarification to the text of the EIR with regards to the water system upgrades as anticipated in the previously contemplated development and required by County Code. The clarifications identified herein supplement and supersede the information in the April 2025 Final EIR. As identified throughout this memorandum, none of these clarifications constitute significant new information or alter the environmental conclusions presented in Draft or Final EIRs such that recirculation of the EIR would be warranted under the California Environmental Quality Act (CEQA). See Section 1.4 of the April 2025 Final EIR for further detail and discussion on the various triggers for recirculation of an EIR under CEQA.

Background

The Draft EIR (page 3-4) explains that "the Project would include all utility improvements to serve the Project, including drainage and stormwater, water, wastewater, and dry utilities. The site is an urban infill site located adjacent to existing utilities and would connect to the existing infrastructure located within the adjacent roadways. Additionally, the local public water purveyor (Cal American Water Company) has issued a 'will serve' letter for the Project that indicates that the purveyor has sufficient supply and capacity to serve the Project" (Draft EIR, p. 3-4).

It is noted, however, that the California American Water Company's will-serve letter (included in the Draft EIR within Appendix B), states that "to provide adequate water flow for fire protection, as may be required by the cognizant fire department, the exact size and length of any main, fire service, or fire hydrant that may have to be installed will have to be determined by a qualified hydraulics engineer..." (Draft EIR, Appendix B; California American Water 2016). In a letter dated September 26, 2016, the County of Los Angeles Fire Department (LACFD) issued conditions of approval for the Project. Among a variety of standard and typical conditions, these require the installation of one public fire hydrant and one private fire hydrant. These are proposed to be located along the Project site's Overhill Drive frontage and within the Project's driveway. LACFD further specifies that the required fire flow to the new public fire hydrant may need to be up to 2,875 gallons per minute at 20 pounds per square inch (subject to potential reductions by LACFD based on the future architectural plan review process prior to building permit issuance). The fire flow to the new private fire hydrant must be 1,250 gallons per minute at 20 pounds per square inch (LACFD 2016). Conditions requiring the maintenance of a water system by the water purveyor to serve the land division, and the inclusion of fire hydrants (both on and off-site), is also referenced in the Los Angeles County Department of Public Works (LACDPW) approval letter, dated September 26, 2016 (LACDPW 2016).

The Project, therefore, includes development of the proposed multi-family residential structure, pedestrian and sidewalk improvements along Overhill Drive, as well as upgrades to existing appurtenant utilities required to serve the Project. As described in the Draft and Final EIR, most utility improvements would be located within the Project site or along the immediately adjacent public rights-of-way. However, water system infrastructure improvements

extending beyond the Project site may be required in order to deliver the fire flows required by the LACFD. Clarifications have been made to the Draft EIR, as shown below, to reflect the potential need for upgrades to the existing off-site water system required in the conditions of approval for the Project. Such improvements are required to ensure that the Project is served by adequate fire flow.

Supplemental Errata

Text from Chapter 3, Project Description, of the Draft EIR, has been updated below to account for the potential water infrastructure improvements required to serve the Project. These changes are shown below and are applicable throughout the EIR. Text that has been added as part of the Final EIR is shown as bold underline (i.e., **underline**).

Section 3.3.3, Utilities, Page 3-4

The Project would include all utility improvements to serve the Project, including drainage and stormwater, water, wastewater, and dry utilities. The site is an infill site located adjacent to existing utilities and would connect to the existing infrastructure located within the adjacent roadways. The Project would be subject to a grading and/or site drainage review and be required to comply with the County's Low Impact Development Ordinance to minimize or reduce runoff. The Project would also be required to comply with the requirements of the County's MS4 Permit (Municipal Separate Storm Sewer System). The local public water purveyor (Cal American Water Company) has issued a "will serve" letter for the Project that indicates that the purveyor has sufficient supply and capacity to serve the Project. **Additionally, in order to comply with Los Angeles County Fire Department requirements for fire flow and water pressure, the Project would include local upgrades to the existing off-site water system, which may entail water pipeline improvements in the Project vicinity and/or improvements to the Mount Vernon Pumping Station to increase the station's pumping capacity. These off-site water system upgrades would need to be completed to the satisfaction of the Los Angeles County Fire Department and the Los Angeles County Department of Public Works prior to Project construction.** The Project would connect to existing dry utilities surrounding the Project site, such as electric, natural gas, and telecommunication infrastructure. Consultation with all appropriate utilities to determine the extent of the dry utilities needed to serve the Project would be required prior to and during the final infrastructure/improvement plan stages.

Analysis

The upgrades to the existing water system required for the Project would be associated with temporary construction activities in the Project vicinity. Pumping capacity improvements at the Mount Vernon Pumping Station (an existing facility located at 4900 South Verdun Avenue, approximately 1,000 feet northeast of the Project site) are anticipated to be associated with installing additional pumps and/or replacing existing pumps with more powerful pumps within the existing facility. All work is anticipated to occur within the existing facility and would not differ substantially from routine maintenance and upgrades that could occur at the facility under existing conditions. Water pipeline improvements may entail construction work within roadways and public rights-of-way in the Project vicinity. Such improvements may require temporary excavations within existing roadways and public rights-of-way, which may be associated with temporary lane closures and/or vehicular, cyclist, and/or pedestrian detours. The improvements would be constructed in accordance with all standard County processing protocols, County permits,

and applicable County code requirements and would need to be in place prior to final map recordation and prior to issuance of building permits for the Project. Temporary construction activities from the existing water system upgrades will be required to occur before construction activities for the proposed multi-family residential building and are thus not expected to overlap with the on-site construction activities. Once the upgrades to the existing off-site water system are complete, the improved system would operate passively, and related maintenance activities would not be substantially different from existing conditions.

As discussed in the “Introduction” section of this memorandum, the Court found that the MND prepared in 2017 for the Project satisfied the requirements of CEQA in relation to all environmental topics except for traffic and circulation. The Court found that the EIR to be prepared need not include those issues (i.e., all topics other than traffic and circulation) for which the record justifies the County’s actions and determinations. The addition of details and clarification regarding the Project’s water infrastructure improvements to the EIR has not altered the traffic and circulation analysis or conclusions as presented in the Draft and Final EIR. The temporary construction activities associated with the water infrastructure improvements near the Project site would not conflict with policies addressing the circulation system, would not affect the Project’s vehicle miles traveled analysis, would not introduce hazardous roadway design features or incompatible uses, and would not result in inadequate emergency access. While temporary vehicular, cyclist and/or pedestrian inconvenience may occur as a result of pipeline improvements within roadways and public rights-of-way, temporary construction-related traffic is expected to be minor and would not contribute to the Project’s vehicle miles traveled. For these reasons, the Project’s water infrastructure improvements would not change the EIR’s impact conclusions with regards to traffic and circulation. Impacts would remain less than significant.

With regards to the environmental topical areas that were upheld by the Court, it is noted for informational purposes that the addition of details and clarification regarding the Project’s anticipated existing water system upgrades does not result in new significant impacts or significant impacts of increased severity. As with construction of the proposed multi-family residential building, and proposed pedestrian and sidewalk improvements along Overhill Drive, the temporary construction activities associated with existing water systems upgrades may result in temporary air emissions, temporary noise and vibration, and the potential for inadvertent finds of archaeological and paleontological resources during any ground-disturbing activities. The Project’s construction-related mitigation measures would continue to apply to the construction activities associated with water infrastructure improvements, as applicable, including dust reduction measures (MM-3 and MM-3.1), protections for any inadvertent finds of archaeological resources (MM-5) and paleontological resources (MM-5.1), protections for any nesting birds (MM-4), and construction noise restrictions (MM-13.1, MM-13.2, MM-13.3, and MM-13.4) (see Chapter 4, Mitigation and Monitoring and Reporting Program, of the April 2025 Final EIR, for more details). Upon required compliance with County requirements and Project-specific mitigation measures, the proposed off-site existing water system upgrades would not be anticipated to result in new significant impacts or significant impacts of increased severity. Once constructed, the proposed water infrastructure improvements would ensure adequate fire flow and water pressure for the Project site. Operational impacts would be minimal to negligible, as the water infrastructure improvements would operate passively, and maintenance activities would be generally consistent with the existing water system maintenance activities in the Project area.

Given this, the proposed upgrades to existing off-site water system would not result in new significant impacts, nor result in a substantial increase in the severity of an environmental impact identified in the Draft EIR. Moreover, these off-site water utility upgrades do not introduce a feasible project alternative or mitigation measure that would lessen the Project’s environmental impacts that the Project applicant has declined to adopt. Further, the addition

of details and clarification regarding the Project's water infrastructure improvements has not caused the Draft EIR to be so fundamentally flawed and inadequate that it precludes meaningful public review. As such, the addition of details and clarification regarding the Project's off-site existing water system upgrades does not constitute "significant new information" as defined in CEQA Guidelines section 15088.5(a). Overall, the clarifying information provided in this Supplemental Errata would not change the impact determinations or conclusions presented in the Draft EIR. Therefore, recirculation of the Draft EIR under CEQA Guidelines section 15088.5(a) is not warranted.

References

California American Water. 2016. Will-Serve Notice. 5101 South Overhill Dr. Los Angeles. May 20, 2016.

LACFD (County of Los Angeles Fire Department). 2016. Project Conditions of Approval. Project TR 73082. September 16, 2016

LACDPW (County of Los Angeles Department of Public Works). 2016. Project Conditions of Approval. Project TR 73082. September 26, 2016.