

THIS SPACE FOR CLERK'S USE ONLY

Complete and attach this form to each CEQA Notice filed with the County Clerk

TYPE OR PRINT CLEARLY

Project Title

Watts Empowerment Center Music & Film Studio Expansion & New Outdoor Play Area

Check Document being Filed:

Chicon Document being Thea.
Environmental Impact Report (EIR)
Mitigated Negative Declaration (MND) or Negative Declaration (ND)
Notice of Exemption (NOE)
Other (Please fill in type):

Notice of Exemption

Appendix E

	P.O. Box 3044, Room		From: (Public Agency): Housing Authority of the City of Los Angeles 2600 Wilshire Boulevard						
	Sacramento, CA 958	12-3044	Los Angeles CA 90057						
	County Clerk County of: Los Angele 2400 Imperial Highway, 1st floor I Norwalk, CA 90650		(Address)						
-			Music & Film Studio Expansion & New Outdoor Play Are						
Proj	ect Applicant: Housi	ng Authority of the C	City of Los Angeles (HACLA)						
Proj	ect Location - Specific	:							
22	50 East 114th Str	eet, Los Angeles,	, California						
Proi	ect Location - City:	L os Angeles	Project Location - County: Los Angeles						
-	cription of Nature, Pur								
Emp surro	powerment Center by expan	ding the building to add a	governments as well as private foundations to improve the Watts music and film studio for use by residents of Imperial Courts and the yground; improve and update the sports fields and add new landscaping						
Nam	ne of Public Agency Ap	pproving Project: Hou	using Authority of the City of Los Angeles						
Nam	ne of Person or Agenc	y Carrying Out Projec	t: Housing Authority of the City of Los Angeles						
	□ Declared Emerge	ncy (Sec. 21080(b)(3)); 15269(a));						
	☐ Emergency Project☑ Categorical Exem		15269(b)(c)); section number: Section 15301 (Existing Facilities); Section 15304 (minor alt or land); and Section 15323 (Operation						
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ATTACHMENT A BACKGROUND, PROJECT DESCRIPTION AND JUSTIFICATION FOR CEQA EXEMPTIONS

1.0 PROJECT BACKGROUND

Imperial Courts Public Housing Project

Imperial Courts located at 11541 Croesus Avenue off Imperial Highway, between Grape Street and Mona Boulevard, totals 36.12 acres and includes 88 structures, including 86 residential buildings, 1 management building, 1 community building and scattered playgrounds and open space. The Imperial Courts is a Federally subsidized project of 490 units that was initiated as war worker housing in May 1944 but redeveloped and fully expanded into a public housing site in 1955. It is operated by the Housing Authority of the City of Los Angeles (HACLA) and is one of the largest housing projects west of the Mississippi.

The initial build out of Imperial Courts always included a central recreational space with playgrounds, sports fields, and a central gym and community building.

Watts Empowerment Center

The Watts Empowerment Center (primary address: 2250 East 114th Street, Los Angeles, California; and secondary addresses: 11425 and 11513 Gorman Avenue and 1214, 1222, 1234 John Street, 1467 Glen Avenue) is currently occupied as a Recreational Center for commercial use. Onsite operations is branded as Watts Empowerment Center and consists of recreational and children daycare activities. In addition to the primary building, the subject property is also improved with a playground, basketball court, picnic area, skateboard park, softball field, futsal court, modular classroom spaces for childcare and resident meetings, and landscaped areas.

According to available historical sources, the subject property was formerly undeveloped as early as 1896; developed with single-family dwellings between 1922 and 1952; developed with a community building between 1953 and 1963; developed with a community building and two classroom buildings between 1968 and 1998; and developed with the current structures in 1998 and 2000.

Proposed Expansion and Outdoor Improvements

As part of a Choice Neighborhood engagement process in 2019, the community of Watts discussed projects that were important to their community's education and job attainment desires. Out of that process, the community prioritized the development of a Music and Film Studio as an expansion of the Watts Empowerment Center. The Music and Film Studio would be used by onsite Imperial Courts residents and available to youth and young adults throughout Watts to learn the technical and business aspects of music and film production and encourage residents to create their own films and music. The current draft plans assume the studio space will constructed a 2,000-3,000 square foot addition to the primary Watts Empowerment Center building in place of an existing outdoor playground.

Initial Community Development Block Grant funding has been set aside by the City of Los Angeles to help with the design and build out of the music and film studio and additional grants from the CA



Arts Council and private donors are assisting with the cost of construction and purchase of various equipment and tools necessary to create a working studio. In October 2022, HACLA undertook a Master Plan Study of the entire recreation center campus with Carrier Johnson as lead architect and came up with a revised schematic for the site that would allow for improved sports facilities, preserve and expand outdoor shade and landscaping as well as play. Based on this plan, HACLA applied for and received funds from the State of California to engage in the rehabilitation of this space. The primary users of the expanded outdoor area will be residents of Imperial Courts.

Demographic Characteristics of Imperial Courts

Amp Proper	Property	Property Name Y & Address	Acres	Actual Units	Occupied Units	Rate of Occupied Units	No. of Residents	Ethnic Profile			Age/Sex Profile				Average Rent Per	Avg. Gross Monthly	
								Categories	Count	Percent	Categories	Male	Feniale	Town	Percent	Month	Income/ Family
		Imperial Courts	36.1	486	473	97.3%	1,410	Hispanic	754	53.5%	0-5	66	75	141	10.0%	% % \$513	\$2,096
								Black	629	44.6%	6-13	163	163	326	23.1%		
4010	4010							Asian	12	09%	14-17	93	87	180	12.8%		
4019	4019							Am. Indian	-	0.0%	18-21	55	53	108	7.7%		
								Caucasian	12	0.9%	22-40	65	244	309	21.9%		
		Los Angeles, CA 90059						Other	3	0.2%	41-60	56	179	235	16.7%		
								Total	1,410	100%	61+	33	78	111	7.9%		
									Total	531	879	1,410	100%				

Additional Stats for Census Tract 2431-2020 American Community Survey:

Total Population: 6,090 people

Female: 3,241 people Male: 2,849 people

Age

Median Age: 26 years

Under 20 years old: 2,559 people

Poverty

53.9% of the impoverished community are black 48.2% of community members under 18 live in poverty

25% of the adult population lives in poverty

Demographics

62.4% of community members are hispanIc or latino 34.2% of community members are black/african american

1.9% of community members are white

1.5% of community members are other

Housing Tenure

69.4% of housing in the community is renter-occupied 30.6% of housing in the community is owner-occupied

Labor Force Participation

38.3% of community members over 16 identify as male 24.1% of community members over 16 identify as female

Income

A majority of households making less than \$75,000 spend 30% or more on housing costs 81.9% of households yearly income is less than \$75,000



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2.0 PROJECT DESCRIPTION

The Housing Authority of the City of Los Angeles (HACLA) is proposing to add between 2,000 and 3,000 square feet to its existing recreation center at Imperial Courts (branded as the Watts Empowerment Center) to create a new music and film studio and to replace existing outdoor fields and recreation spaces with new landscaping, seating areas, playgrounds and sports courts. Both projects, captured in HACLA's Imperial Courts Recreation Center Master Plan from October 2022 are located in the Watts neighborhood within the City of Los Angeles. The existing Imperial Courts Recreation Area, is 105,200 square feet, with three community buildings totaling 19,570 square feet, and is located at 11541 Croesus Ave, Los Angeles, CA 90059 in the southeastern portion of the Community of Watts. The project site's accessor parcel number (APN) is 6067-013-901, however, it should be noted that this is part of a 13-acre site which also includes a number of residential buildings.

Refer to **Figures 1** and **2** below, which depict the project's location and existing site photographs.

General Plan Land Use and Zoning

The project site has a general plan land use designation of Low Medium II Residential and a zoning designation of Residential Zone (RD2-1) (Refer to **Table 2**).¹

Surrounding Development

The project site is surrounded by an apartment buildings and parking lots to the north, south, east and west.⁷ The surrounding land has similar general plan land use designations of Low Medium II Residential and a zoning designation of Residential Zone (RD2-1) to the east, west, and south (Refer to **Table 2**).⁸

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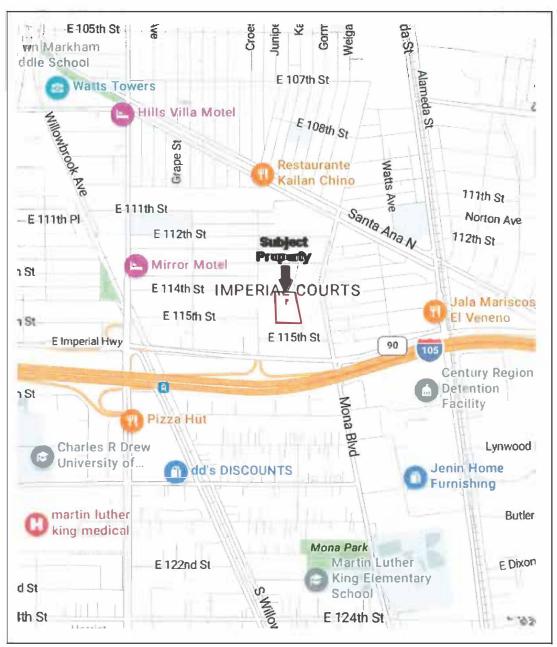
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¹ Zimas, 2023. Accessed online at http://zimas.lacity.org/. Accessed on July 24, 2023.



Figure 1 PROJECT LOCATION MAP & SITE PLAN



Not to Scale

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Figure 2 PROJECT SITE PHOTOGRAPHS



Photo 1: View of the front of the Watts Empowerment Center



Photo 3: View from the south with ball field.



Photo 2: View from the northwest picnic area.



Photo 4: View of the playground area proposed for music and film studio looking southeast.



<u>Table 2</u> EXISTING LAND USES FOR THE PROJECT SITE AND SURROUNDING AREA

Location	General Plan Land Use	Zoning Designation	Existing Development
Project Site	Low Medium II Residential	Residential Zone (RD2-1)	Recreation Center and Open Space
North	Low Medium II Residential	Residential Zone (RD2-1)	Apartment buildings
South	Low Medium II Residential	Residential Zone (RD2-1)	Apartment buildings & Computer Lab
East	Low Medium II Residential	Residential Zone (RD2-1)	Apartment buildings
West	Low Medium II Residential	Residential Zone (RD2-1)	Apartment buildings

Source: Zimas, 2023. Accessed online at http://zimas.lacity.org/

Building History and Existing Conditions

A recreation center and surrounding recreational and open space was originally constructed in 1955 and has received multiple renovations and additions over time. According to Sanborn maps and LADBS records, the older recreation center was demolished in 1998 and by 2005 the current Watts Empowerment Center and Buildings B and C were constructed and in use. The Watts Empowerment Center and Buildings B and C combine to a total of 19,570 square feet with the primary building estimated at a little over 11,500 square feet. The Watts Empowerment Center has a large main gym, commercial kitchen, offices, bathrooms and a number of rooms for exercise, homework, and engagement. The primary gym has a stage. The surrounding play areas include picnic spaces, shade trees, playgrounds, a child care center, additional classroom/offices and various fields and sports courts.

Project Operations

It is anticipated that the project site will continue to serve the same population after renovations as before. The services and open spaces are primarily used by the over 1,400 residents of Imperial Courts public housing and the surrounding neighborhood in southeast Watts. The project site would continue to operate Monday through Saturday with normal hours of operation between 8am and 6pm, with some extended hours during summer and with special events.

The project is made up of two components. The expansion of the Watts Empowerment Center is expected to include new construction, through a building expansion of approximately 2,000-3,000 square feet. The expansion may require minor renovations to the Empowerment Center building to ensure the property meets California building standards codes. The second component, which includes the rehabilitation of open space, including construction of new playgrounds, ball fields, and seating areas as well as landscaping will take place within the existing envelope of the outdoor area. Renovations or alterations would not substantially change land uses, and are not expected to substantially change existing unit counts.

HACLA currently contracts with RedEye, a nonprofit benefit corporation to operate services in the Watts Empowerment Center and activate programming of the outdoor spaces. Permit applications, would be submitted after architectural and landscape drawings are complete. HACLA will contract with one or more general contractors to complete work. HACLA expects to initiate design drawings in Q1 2024 and hopes to be in permit review and plan check by Q4 2024. The expectation is to begin



construction of both project components by Q2 2025 and complete all construction by Q3 2026.

REASONS WHY THE PROJECT IS EXEMPT

The proposed project is exempt from CEQA under three categorical exemptions.

Categorical Exemptions

Class 1 (CEQA Guidelines 15301): Existing Structures

Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The types of "existing facilities" itemized below are not intended to be all-inclusive of the types of projects which might fall within Class 1. The key consideration is whether the project involves negligible or no expansion of use. Examples include but are not limited to:

- Interior or exterior alterations involving such things as interior partitions, plumbing, and electrical conveyances;
- Restoration or rehabilitation of deteriorated or damaged structures, facilities, or mechanical
 equipment to meet current standards of public health and safety, unless it is determined that
 the damage was substantial and resulted from an environmental hazard such as earthquake,
 landslide, or flood;
- Additions to existing structures provided that the addition will not result in an increase of more than:
 - o 50 percent of the floor area of the structures before the addition, or 2,500 square feet, whichever is less: or
 - o 10,000 square feet if:
 - The project is in an area where all public services and facilities are available to allow for maximum development permissible in the General Plan, and
 - The area in which the project is located is not environmentally sensitive.
- Addition of safety or health protection devices for use during construction of or in conjunction with existing structures, facilities, or mechanical equipment, or topographical features including navigational devices;
- New copy on existing on and off-premise signs;
- Maintenance of existing landscaping

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❖ ATTACHMENT A ❖

- Division of existing multiple family or single-family residences into common-interest ownership and subdivision of existing commercial or industrial buildings, where no physical changes occur which are not otherwise exempt;
- Demolition and removal of individual small structures listed in this subdivision;
 - (1) One single-family residence. In urbanized areas, up to three single-family residences may be demolished under this exemption.
 - (2) A duplex or similar multifamily residential structure. In urbanized areas, this exemption applies to duplexes and similar structures where not more than six dwelling units will be demolished.
 - (3) A store, motel, office, restaurant, and similar small commercial structure if designed for an occupant load of 30 persons or less. In urbanized areas, the exemption also applies to the demolition of up to three such commercial buildings on sites zoned for such use.
 - (4) Accessory (appurtenant) structures including garages, carports, patios, swimming pools, and fences.

Justification why Project is Exempt: Any renovation or alteration of the existing structures by implementation of this project would be considered an allowable addition to an existing structure. The project does not propose additions or demolition exceeding the limits set forth in Section 15301 as it is currently proposed for approximately 2,500 square feet. However, if the expansion exceeds this square footage, it will remain far below 10,000 and the project area is already served by existing public services and facilities and the area is not considered environmentally sensitive after conducting a Phase I and Phase II study. Therefore, the project would be exempt from CEQA under a Class 1 categorical exemption.

Class 4 (CEQA Guidelines Section 15304): Minor Alteration to Land

Class 4 consists of minor public or private alternations in the condition of land, water, and/or vegetation which do not involve the removal of healthy, mature, scenic trees except for forestry or agricultural purposes. Examples include, but are not limited to:

- (a) Grading on land with a slope of less than 10 percent
- (b) New gardening or landscaping, including the replacement of existing conventional landscaping with water efficient or fire resistant landscaping.
- (c) Filling of earth into previously excavated land
- (d) Minor alterations in land, water and vegetation on existing officially designated wildlife management areas
- (e) Minor temporary use of land having negligible or no permanent effects on the environment
- (f) Minor trenching or backfilling where the surface is restored
- (g) Maintenance dredging where the spoil is deposited in a spoil area authorized by all state and federal regulatory agencies



- (h) The creation of bicycle lanes on existing right-of-way
- (i) Fuel management activities within 30 feet of structures to reduce the volume of flammable vegetation

Justification why Project is Exempt: The project proposes to renovate and replace existing landscape and outdoor spaces in the Imperial Courts Recreation Area. The renovation and replacement does not anticipate currently the reduction or loss of any existing mature trees that are in healthy condition. If any trees are removed, they will be done through local City permit and replaced with two additional trees on site for every one tree removed. The new landscaping and related irrigation systems will replace what is existing at the site and ensure improved use and maintenance standards. Therefore, the proposed project is exempt from CEQA under a Class 4 categorical exemption.

Class 23 (CEQA Guidelines Section 15323): Normal Operations of Facilities for Public Gatherings.

Class 23 consists of normal operations of existing facilities for public gatherings for which the facilities were designed, where there is a past history of the facility being used for the same or similar kind of purpose. Past history means that the same or similar activity has been occurring for at least three years and there is a reasonable expectation that a the future occurrence of the activity would not represent a change in the operation of the facility.

Justification why Project is Exempt: The proposed project consists the expansion and renovation of a community facility and surrounding open space and its continue operation to serve the surrounding population. The proposed operator of the facility will remain the same and the facility currently has a small music studio and film equipment. The proposed expansion will just add new space to help with improved programming and services. The sports fields are not in good condition for regular use or organized games although they were used for such in the past. The renovations of the outdoor area will allow for the continuation of outdoor play and engagement. Therefore, the proposed project is exempt from CEQA under a Class 23 categorical exemption.

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