

## **VI. Other CEQA Considerations**

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## 1. Significant Unavoidable Impacts

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2(b) states:

*Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.*

As evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, and summarized below, implementation of the Project would result in significant and unavoidable impacts related to on-site construction noise (Project and cumulative), off-site construction noise (cumulative), and on-site and off-site construction vibration with respect to human annoyance (Project and cumulative). All other impacts associated with the Project would be less than significant or reduced with mitigation to less than significant.

### a. On-Site Construction Noise

As discussed in Section IV.E, Noise, of this Draft EIR, Project construction would have the potential to result in significant noise impacts at the off-site sensitive receptor locations from on-site construction activities. Although implementation of a mitigation measure would reduce the noise generated by on-site construction activities with the installation of temporary sound barriers, Project construction-related noise would still exceed the 5 dBA significance criteria at the uses represented by receptor locations R1, R2, R3, and R5. Thus, potential impacts associated with the Project's on-site construction activities would remain significant and unavoidable.

In addition, cumulative construction noise impacts associated with on-site noise sources would remain significant and unavoidable if nearby Related Project Nos. 40, 49, and 84 were to be constructed concurrently with the Project.

## **b. Off-Site Construction Noise**

As discussed in Section IV.E, Noise, of this Draft EIR, although Project-level noise impacts from off-site construction would be less than significant, cumulative noise due to construction truck traffic from the Project and other related projects is conservatively assumed to exceed the ambient noise levels along the haul route by 5 dBA. Conventional mitigation measures, such as construction of noise barrier walls to reduce the off-site construction noise impacts, would not be feasible as the barriers would obstruct access to the properties. Therefore, cumulative noise impacts from off-site construction would be significant and unavoidable.

## **c. On-Site Construction Vibration**

As discussed in Section IV.E, Noise, of this Draft EIR, although additional mitigation measures, including the installation of a wave barrier, were considered to reduce vibration impacts from on-site construction activities with respect to human annoyance, it was concluded that there are no feasible mitigation measures that could be implemented to reduce the temporary vibration impacts from on-site construction associated with human annoyance to a less-than-significant level. Therefore, Project-level and cumulative vibration impacts from on-site construction activities with respect to human annoyance would remain significant and unavoidable.

## **d. Off-Site Construction Vibration**

As discussed in Section IV.E, Noise, of this Draft EIR, vibration levels from construction trucks would exceed the significance criteria for human annoyance at sensitive receptors (e.g., residential and recording studio uses) along Argyle Avenue, Gower Street, and Selma Avenue, resulting in significant Project-level and cumulative construction vibration impacts. There are no feasible mitigation measures that would reduce the potential vibration human annoyance impacts. Even though impacts would be temporary, intermittent, and limited to daytime hours when the haul truck is traveling within 25 feet of a sensitive receptor, Project-level and cumulative vibration impacts from off-site construction with respect to human annoyance would remain significant and unavoidable.

## **2. Reasons Why the Project is Being Proposed, Notwithstanding Significant Unavoidable Impacts**

In addition to identification of a project's significant unavoidable impacts, Section 15126.2(b) of the CEQA Guidelines states that where there are impacts that cannot be alleviated without imposing an alternative design, their implications and

the reasons why the project is being proposed, notwithstanding their effect, should be described.

As discussed in Section II, Project Description, of this Draft EIR, the Project is a mixed-use project that would provide new multi-family housing and neighborhood-service retail and restaurant uses that serve the community and promote walkability. In addition, the Project would provide new residential units, including restricted affordable units, to help meet the demand for new affordable and market-rate housing opportunities in the Hollywood community and City.

The Project provides an opportunity to fulfill policy directives reflected in both local and regional land use plans by concentrating mixed-use, pedestrian-friendly development in an area that is targeted for higher density, urban growth. Specifically, as discussed in Section IV.D, Land Use, of this Draft EIR, the Project Site is located in a High-Quality Transit Area (HQTAs) as designated by the Southern California Association of Government (SCAG) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS). HQTAs are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Local jurisdictions are encouraged to focus housing and employment growth within HQTAs. The Project would be located in an area well-served by existing public transportation, including Los Angeles County Metropolitan Transportation Authority (Metro) and Los Angeles Department of Transportation (LADOT) bus lines, as well as the Metro Red Line Hollywood/Vine Station, to focus growth along major transportation corridors and within walking distance of a transit station. At the local level, the Project Site is designated as Commercial Manufacturing in the Hollywood Community Plan (Community Plan). The Project Site's Commercial Manufacturing land use designation is currently inconsistent with the land use designation of the surrounding properties (designated as Regional Center Commercial by the Community Plan) and with current [Q]C4-1VL-SN (Commercial with Q Condition, Height District 1-VL, Hollywood Signage Supplemental Use District) zoning designation for the Project Site. The Project would change the Project Site's land use designation to Regional Center Commercial and the zoning to (T)(Q)C4-2D-SN. The proposed land use and zoning designation would be consistent with the surrounding properties, and with the development pattern intended for the area in the Community Plan. In addition, Project has been designed in a modern style and would be integrated into the Argyle Avenue and Selma Avenue street frontages by siting the proposed commercial uses on the ground floor level to encourage pedestrian activity. Furthermore, the Project would be constructed to incorporate environmentally sustainability design features required by the Los Angeles Green Building Code, and additional sustainability design features would be incorporated to reduce energy and water usage and waste generation, thereby reducing associated greenhouse gas emissions and help minimize impact on natural resources and

infrastructure. Thus, the Project would contribute to the attainment of the land use goals, objectives, and policies applicable to the Project Site.

As discussed above, the Project would result in significant and unavoidable impacts related to on-site construction noise (Project and cumulative), off-site construction noise (cumulative), and on-site and off-site construction vibration with respect to human annoyance (Project and cumulative). Under Project and cumulative conditions, significant impacts from on-site noise would occur during construction for limited durations from the use of construction equipment, the location of the equipment, the timing and duration of the noise-generating construction activities, and the relative distance to noise-sensitive receptors. In addition, cumulative noise due to off-site construction truck traffic from the Project and other related projects would have the potential to exceed ambient noise levels along the haul route by 5 dBA, resulting in significant impacts. Under Project and cumulative conditions, significant impacts from on-site vibration with respect to human annoyance would occur during construction for limited durations from the use of construction equipment, and significant impacts from off-site vibration with respect to human annoyance would occur during construction from construction trucks traveling along the anticipated haul route. Such impacts would be short-term and would cease upon completion of certain construction activities. Notwithstanding, as evaluated in Section V, Alternatives, of this Draft EIR, alternatives to the Project were considered to eliminate the significant short-term impacts from on-site construction noise (Project and cumulative), off-site construction noise (cumulative), and on-site and off-site construction vibration with respect to human annoyance (Project and cumulative). As discussed therein, significant construction noise and vibration impacts would be expected to occur with any development scenario because construction activities and the need to grade and excavate the Project Site are inherently disturbing. Thus, reducing temporary construction noise and vibration impacts below a level of significance at sensitive uses adjacent to haul truck activity would be infeasible. Furthermore, any reduction in the intensity of haul truck activity would actually increase the overall duration of the construction period. Among the four alternatives considered, no feasible alternative was identified that would eliminate the Project's significant and unavoidable noise and vibration impacts, with the exception of the No Project/No Build Alternative. However, the No Project/No Build Alternative would not meet any of the Project objectives or the Project's underlying purpose of revitalizing the Project Site by developing a high-quality mixed-use development that provides new multi-family housing opportunities and neighborhood-serving retail and restaurant uses that serve the community and promote walkability. As discussed in Section V, Alternatives, of this Draft EIR, the Project, as proposed, satisfies the Project objectives to a greater degree than any of the proposed alternatives. This Draft EIR also includes mitigation measures that reduce the potential impacts associated with the Project.

Overall, the Project presents several benefits that override the limited and temporary adverse effects it may have on the environment.

### 3. Significant Irreversible Environmental Changes

Section 15126.2(c) of the CEQA Guidelines indicates that an EIR should evaluate significant irreversible environmental changes that would be caused by implementation of a proposed project. As stated in CEQA Guidelines Section 15126.2(c), “[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

The Project would necessarily consume a limited amount of slowly renewable and non-renewable resources that could result in irreversible environmental changes. This consumption would occur during construction of the Project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that would include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation. As demonstrated below, the Project would consume a limited commitment of natural resources and would not result in significant irreversible environmental changes.

#### a. Building Materials and Solid Waste

Construction of the Project would require consumption of resources that do not replenish themselves or which may renew so slowly as to be considered non-renewable. These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), and petrochemical construction materials (e.g., plastics).

Solid Waste is addressed in the Initial Study for the Project, which has been included as Appendix A to this Draft EIR. During construction, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. In addition, during operation, the Project would provide on-site recycling containers within a designated recycling area for Project residents to facilitate recycling in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687) and the Los Angeles Green Building Code. In accordance with Assembly Bill (AB) 1826, the Project would also provide for the recycling of organic waste. The Project would adhere to state and local solid waste policies and objectives that further diversion goals. Thus, the consumption of non-renewable building materials such as lumber, aggregate materials, and plastics would be reduced.

## **b. Water**

Consumption of water during construction and operation of the Project is addressed in Section IV.I.1 Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. As evaluated therein, given the temporary nature of construction activities, the short-term and intermittent water use during construction of the Project would be less than the net new water consumption estimated for the Project at buildout. During operation, the estimated water demand for the Project would not exceed the available supplies projected by the City of Los Angeles Department of Water and Power (LADWP). Thus, LADWP would be able to meet the water demand of the Project, as well as the existing and planned future water demands of its service area. In addition, pursuant to Project Design Feature WAT-PDF-1, the Project would implement a variety of water conservation features to reduce indoor water use in excess of LAMC requirements. Furthermore, the Project would be required to reduce indoor water use by at least 20 percent in accordance with the City of Los Angeles Green Building Code. Thus, as evaluated in Section IV.I.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, while Project construction and operation would result in some irreversible consumption of water, the Project would not result in a significant impact related to water supply.

## **c. Energy Consumption and Air Quality**

During ongoing operation of the Project, non-renewable fossil fuels would represent the primary energy source, and thus the existing finite supplies of these resources would be incrementally reduced. Fossil fuels, such as diesel, gasoline, and oil, would also be consumed in the use of construction vehicles and equipment. Project consumption of non-renewable fossil fuels for energy use during construction and operation of the Project is addressed in Section IV.J, Energy Conservation and Infrastructure, of this Draft EIR. As discussed therein, construction activities for the Project would not require the consumption of natural gas, but would require the use of fossil fuels and electricity. On- and off-road vehicles would consume an estimated 29,604 gallons of gasoline and approximately 205,265 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.001 percent of the 2017 annual on-road gasoline-related energy consumption and 0.03 percent of the 2017 annual diesel fuel-related energy consumption in Los Angeles County. Furthermore, a total of approximately 6,263 kWh of electricity is anticipated to be consumed during Project construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. The estimated construction electricity usage represents approximately 0.4 percent of the estimated net annual operational demand, which would be within the supply and infrastructure service capabilities of LADWP. Therefore, the Project would not result in the

wasteful, inefficient, and unnecessary consumption of energy resources. Therefore, impacts related to the consumption of fossil fuels during construction of the Project would be less than significant.

During operation, the Project's increase in electricity and natural gas demand would be within the anticipated service capabilities of LADWP and the Southern California Gas Company, respectively. As discussed in Section IV.J, Energy Conservation and Infrastructure, of this Draft EIR, the Project would comply with 2016 Title 24 standards and applicable 2016 CALGreen requirements. In addition, new buildings and infrastructure would include electricity conservation features and additional features that would be capable of achieving LEED® certification or equivalent green building standards. Therefore, the Project would not cause the wasteful, inefficient, and unnecessary consumption of energy. Furthermore, Project operations would not conflict with adopted energy conservation plans. Refer to Section IV.J, Energy Conservation and Infrastructure, of this Draft EIR, for further analysis regarding the Project's consumption of energy resources.

#### **d. Environmental Hazards**

The Project's potential use of hazardous materials is addressed in the Initial Study for the Project, which has been included as Appendix A to this Draft EIR. As evaluated therein, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used for residential and commercial developments. Specifically, operation of the Project would be expected to involve the use and storage of potentially hazardous materials in the form of cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable federal, state, and local regulations. Any associated risk would be reduced to a less than significant level through compliance with these standards and regulations. As such, compliance with regulations and standards would serve to protect against significant and irreversible environmental change that could result from the accidental release of hazardous materials.

#### **e. Conclusion**

Based on the above, Project construction and operation would require the irretrievable commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources and the Project Site for future generations or for other uses. However, the consumption of such resources would not be considered substantial and would be consistent with regional and local growth forecasts and



development goals for the area. The loss of such resources would not be highly accelerated when compared to existing conditions and such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result from the Project, such changes are concluded to be less than significant, and the limited use of nonrenewable resources that would be required by Project construction and operation is justified.

## 4. Growth-Inducing Impacts

Section 15126.2(d) of the CEQA Guidelines requires that growth-inducing impacts of a project be considered in a Draft EIR. Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant that, for example, may allow for more construction in service areas). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, thus requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also require a discussion of the characteristics of projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Finally, the CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.

### a. Population

As discussed in Section II, Project Description, of this Draft EIR, the Project includes 276 residential units. According to the Department of City Planning, the most recent estimated household size for multi-family housing units in the City of Los Angeles area is 2.43 persons per unit.<sup>1</sup> Applying this factor, development of up to 276 units would result in a net increase of approximately 671 residents. According to the Southern California Association of Governments (SCAG) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), the forecasted population for the City of Los Angeles Subregion in 2017 is approximately 3,981,911 persons.<sup>2</sup> In 2023, the projected occupancy year of the Project, the Subregion is anticipated to have a population of

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<sup>1</sup> Based on a 2.43 persons per household rate for multi-family units based on the 2016 American Community Survey 5-Year Average Estimate (2012-2016) per correspondence with Jack Tsao, Los Angeles Department of City Planning Demographics Unit, March 8, 2018.

<sup>2</sup> Based on a linear interpolation of 2012–2040 data.

approximately 4,145,604 persons.<sup>3</sup> Thus, the 671 estimated net new residents generated by the Project would represent approximately 0.41 percent of the population growth forecasted by SCAG in the Subregion between 2017 and 2023. Therefore, the Project's residents would be well within SCAG's population projections in the 2016–2040 RTP/SCS for the Subregion and would not result in a significant direct growth-inducing impact.

## b. Employment

In addition to the residential population generated by the Project, the Project would have the potential to generate indirect population growth in the vicinity of the Project Site as a result of the employment opportunities generated by the Project.

During construction, the Project would create temporary construction-related jobs. However, the work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, construction workers would not be expected to relocate to the Project vicinity as a direct consequence of working on the Project. Therefore, given the availability of construction workers, the Project would not be considered growth-inducing from a short-term employment perspective. Rather, the Project would provide a public benefit by providing new employment opportunities during the construction period.

Under the Retail/Restaurant Option, the Project would provide 24,000 square feet of neighborhood-serving commercial retail and restaurant uses, which would generate approximately 65 employees.<sup>4</sup> Alternatively, in lieu of the proposed retail and restaurant uses, the Project could develop a 27,000 square-foot grocery store. Under the Grocery Store Option, the Project could generate approximately 73 employees.<sup>5</sup> According to the 2016–2040 RTP/SCS, the employment forecast for the Subregion is approximately 1,780,811 employees in 2017 and approximately 1,882,104 employees in 2023, which means the 65 estimated new employees under the Retail/Restaurant Option and the 73 estimated new employees under the Grocery Store Option would represent, respectively, approximately 0.06 percent and 0.07 percent of the employment growth forecasted by the 2016–2040 RTP/SCS.<sup>6</sup> Therefore, the Project would not cause an

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<sup>3</sup> *Based on a linear interpolation of 2012–2040 data.*

<sup>4</sup> *Based on the employee generation rate for “Neighborhood Shopping Center” land uses of 0.00271 employees per average square foot as provided in the Los Angeles Unified School District, 2016 Developer Fee Justification Study, March 2017.*

<sup>5</sup> *Ibid.*

<sup>6</sup> *Based on a linear interpolation of 2012–2040 data.*

exceedance of SCAG's employment projections contained in the 2016–2040 RTP/SCS. In addition, the proposed commercial uses would include a range of full-time and part-time positions that are typically filled by persons already residing in the vicinity of the workplace, and who generally do not relocate their households due to such employment opportunities. Therefore, given the likelihood that employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, the potential growth associated Project employees who may relocate their place of residence would not be substantial. Although it is possible that some of the employment opportunities offered by the Project would be filled by persons moving into the surrounding area, which could increase demand for housing, it is anticipated that most of this demand would be filled by existing vacancies in the housing market in the vicinity of the Project Site. As such, the Project's neighborhood-serving retail and restaurant or grocery store uses would be unlikely to create an indirect demand for additional housing or households in the area.

### **c. Utility Infrastructure Improvements**

The area surrounding the Project Site is already developed with residential, commercial, and entertainment-related uses, and the Project would not remove impediments to growth. The Project Site is located within an urban area that is currently served by existing utilities and infrastructure. While the Project may require minor local infrastructure upgrades to maintain and improve water, sewer, electricity, and natural gas lines on-site and in the immediate vicinity of the Project Site, such improvements would be limited to serving Project-related demand, and would not necessitate major local or regional utility infrastructure improvements that have not otherwise been accounted and planned for on a regional level.

### **d. Conclusion**

Overall, the Project would be consistent with the growth forecast for the City of Los Angeles Subregion and with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of vehicle miles traveled. In addition, the Project would not require any major utility infrastructure or roadway improvements, nor would the Project open any large undeveloped areas for new use. Any utility or access improvements would be limited to minor infrastructure upgrades to serve the Project and driveways necessary to provide immediate access to the Project Site and to improve safety and walkability. Therefore, direct and indirect growth-inducing impacts would be less than significant.

## 5. Potential Secondary Effects of Mitigation Measures

Section 15126.4(a)(1)(D) of the CEQA Guidelines states that “if a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed.” With regard to this section of the CEQA Guidelines, the potential impacts that could result with the implementation of each mitigation measure proposed for the Project was reviewed. The following provides a discussion of the potential secondary impacts that could occur as a result of the implementation of the proposed mitigation measures, listed by environmental issue area.

### a. Cultural Resources

Mitigation Measure CUL-MM-1 states that a qualified archaeologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the archaeologist and shall depend on the rate of excavation and grading activities and the materials being excavated. Specifically, if archaeological materials are encountered, the archaeologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The archaeologist shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist’s recommendations have been implemented to the satisfaction of the archaeologist. As such, this mitigation measure represents procedural actions and would be beneficial in protecting archaeological resources that could potentially be encountered on-site. Thus, implementation of Mitigation Measure CUL-MM-1 would not result in adverse secondary impacts.

Mitigation Measure CUL-MM-2 states that a qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities and the materials being excavated. Specifically, if paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating paleontologist,

and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist. As such, this mitigation measure represents procedural actions and would be beneficial in protecting paleontological resources that could potentially be encountered on-site. Thus, implementation of Mitigation Measure CUL-MM-2 would not result in adverse secondary impacts.

## **b. Noise**

Construction of the Project would have the potential to result in significant noise impacts at sensitive receptor locations from on-site construction activities, including operation of construction equipment, location of the equipment, the timing and duration of the noise-generating construction activities, and the relative distance to noise-sensitive receptors. In addition, cumulative noise impacts associated with on-site noise sources would be significant if nearby Related Projects Nos. 40, 49, and 84 were to be constructed concurrently with the Project. To reduce on-site construction-related noise impacts, Mitigation Measure NOI-MM-1 would require that a temporary and impermeable sound barrier be erected in proximity to receptor locations R2, R4, and R5. The installation of temporary sound barriers would reduce the noise generated by on-site construction activities by minimum of 5 to 11 dBA at receptor locations R2 to R5, and provide a minimum 15 dBA noise reduction at receptor location R1 in the event that the proposed mixed-use development at receptor location R1 is constructed and occupied prior to Project construction. The proposed temporary sound barriers would also minimize views of the construction area from adjacent uses. The noise and vibration generated by the installation of the temporary sound barrier would be short-term and would be required to comply with the City's noise thresholds. In addition, upon completion of construction, the temporary sound barrier would be removed. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

## **6. Effects Not Found To Be Significant**

Section 15128 of the CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the EIR. An Initial Study was prepared for the Project and is included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City of Los Angeles determined through the Initial Study that the Project would not have the potential to cause significant impacts related to aesthetics; agricultural and forest resources; objectionable odors; biological resources, including potential conflicts with applicable habitat conservation plans or natural community conservation plans; geology and soils;

hazards and hazardous materials; hydrology and water quality; physical division of an established community; mineral resources; exposure to excessive noise due to proximity to an airport or a private airstrip; population and housing; change in air traffic patterns; hazardous design feature; inadequate emergency access; stormwater drainage facilities; and solid waste.<sup>7</sup> A summary of the analysis provided in Appendix A for these issue areas is provided below.

### **a. Aesthetics**

As described in the Initial Study of this Draft EIR, Senate Bill (SB) 743 states that: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” The related City of Los Angeles Department of City Planning (DCP) Zoning Information (ZI) File No. 2452 provides further instruction concerning the definition of transit priority projects and that “visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the *L.A. CEQA Threshold Guide* shall not be considered an impact for infill projects within TPAs pursuant to CEQA.” The Project is within a TPA, as confirmed by DCP’s Zoning Information and Map Access System (ZIMAS). Therefore, the aesthetics-related discussions in the Initial Study are provided for only informational purposes and not for determining the significance of impacts to the environment. As discussed in the Initial Study, pursuant to SB 743 and ZI 2452, aesthetic impacts, including impacts related to scenic vistas, scenic resources, visual character or quality, shading, light, and glare, are not considered significant.

### **b. Agricultural and Forest Resources**

The Project Site is located in an urbanized area of the City of Los Angeles and is developed with commercial uses and surface parking areas. The Project Site and surrounding area are not zoned for agricultural or forest uses, and no agricultural or forest lands occur on-site or in the Project area. Therefore, the Initial Study concluded that no impacts would occur.

### **c. Air Quality**

No objectionable odors are anticipated as a result of either construction or operation of the Project. Construction of the Project would use conventional building materials typical

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<sup>7</sup> At the time the Initial Study was published, the Appendix G thresholds did not address telecommunications facilities and wildfire. The City has since adopted the revised Appendix G thresholds and these topics are evaluated below.

of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. The Project would not include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, fiberglass molding, or other land uses associated with odor complaints. The proposed restaurant uses would comply with SCAQMD Rule 1138 regarding restaurant emissions. Although on-site trash receptacles would have the potential to create odors, such receptacles would be contained, located, and maintained in a manner that promotes odor control such that no substantially adverse odor impacts would be anticipated. Construction and operation of the Project would also comply with SCAQMD Rule 402. Thus, the Initial Study concluded that odor impacts would be less than significant.

#### **d. Biological Resources**

Due to the developed nature of the Project Site and surrounding area, and the lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Thus, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. There are no riparian or other sensitive natural communities, or federally protected wetlands as defined by Section 404 of the Clean Water Act on the Project Site or in the surrounding area. Accordingly, Project development would not interfere substantially with any established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Furthermore, no water bodies that could serve as habitat for fish exist on the Project Site or in the vicinity. As no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans.

Landscaping within the Project Site is limited. One lemon gum tree is located towards the southwestern portion of the Project Site, and six ficus and evergreen pear street trees are located outside of the property line along Selma Avenue and Argyle Avenue. All trees are proposed to be removed to allow for the development of the Project. These trees are not species that are protected under the City of Los Angeles Protected Tree Ordinance. However, although unlikely, the trees could potentially provide nesting sites for migratory birds. Removal of the existing trees would comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. Compliance with the MBTA would ensure that impacts would be less than significant. In addition, in accordance

with requirements of the City of Los Angeles Urban Forestry Division, the street trees would be replaced on a 2:1 basis. In addition, a minimum of 69 trees would be planted as part of the Project. The planting of new tree species would be selected to enhance the pedestrian environment, convey a distinctive high quality visual streetscape, and complement trees in the surrounding area.

The Project Site does not support any habitat or natural community. Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan apply to the Project Site. As such, the Project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan.

Therefore, the Initial Study concluded that impacts to biological resources would be less than significant.

### **e. Geology and Soils<sup>8</sup>**

The Project Site is identified as being located within a Fault Rupture Study Area as mapped by the City of Los Angeles General Plan; however, according to ZIMAS, it is not located within a currently established Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards or a City-designated Preliminary Fault Rupture Study Area. Moreover, as determined by the Geotechnical Investigation prepared for the Project, and included with the Initial Study as Appendix A to this Draft EIR, no known active or potentially active faults underlie the Project Site. Therefore, the potential for surface rupture beneath the site is considered low. The Project would not exacerbate existing environmental conditions by bringing people or structures into areas potentially susceptible to substantial adverse effects, including fault rupture. In addition, the Project would be constructed in accordance with the most current seismic design provisions of the 2016 California Building Code, Los Angeles Building Code regulations, and the recommendations of the design level geotechnical investigation for the Project. Therefore, as concluded in the Initial Study, impacts associated with surface rupture from a known earthquake fault and seismic ground shaking would be less than significant.

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<sup>8</sup> *Subsequent to the publication of the Initial Study, provided in Appendix A, of this Draft EIR, the California Natural Resources Agency adopted revisions to the CEQA Guidelines that became effective on December 28, 2018. In the new CEQA Guidelines, the threshold regarding paleontological resources has been moved from Cultural Resources to the Geology and Soils section. The Initial Study concluded that impacts to paleontological resources were potentially significant and as such, impacts are evaluated in Section IV.B, Cultural Resources, of this Draft EIR.*



The Project Site is not located in an area that has been identified by the State or the City of Los Angeles as being potentially susceptible to liquefaction. However, the City's General Plan maps the Project Site as being prone to liquefaction. Therefore, a site-specific liquefaction analysis adhering to CGS procedures was performed as part of the Geotechnical Investigation. The results of the analysis show that the potential for liquefaction at the Project Site is considered to be remote. Furthermore, due to the uniform nature of the underlying geologic materials, excessive differential settlements are not expected to occur on the Project Site. Therefore, the Project would not exacerbate existing environmental conditions and cause or accelerate geologic hazards related to liquefaction, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. Thus, the Initial Study concluded that impacts associated with liquefaction would be less than significant.

The Project Site and surrounding area are fully developed and characterized by flat topography. The Project Site is not located in a landslide area as mapped by the State, nor is the Project Site mapped as a landslide area by the City of Los Angeles. As such, the Project would not exacerbate existing conditions that would result in the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Thus, the Initial Study concluded that no impacts associated with landslides would occur.

Project development activities including grading, excavation, and other construction activities have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. The Project would comply with regulatory requirements, implement standard erosion controls, and adhere to recommendations set forth in the Geotechnical Investigation and conditions of the Los Angeles Department of Building and Safety (LADBS) Approval Letter (both of which are included in Appendix A of this Draft EIR). During Project operation, the potential for soil erosion would be relatively low since the Project Site would be fully developed and/or landscaped. Thus, the Initial Study concluded that impacts related to soil erosion or the loss of topsoil would be less than significant.

The Project Site is not located near slopes or geologic features that would result in on- or off-site landsliding or lateral spreading, and subsidence and collapse are not likely to affect the Project Site based on the depth to groundwater of 64 feet. In addition, due to the uniform nature of the underlying materials within the Project Site, excessive differential settlements are not expected to occur. Furthermore, the Project Site is found to be situated on approximately 3 to 7.5 feet of fill supported by native alluvial soils below that are in the very low to moderate expansion range. As such, reinforcement beyond the minimum required by LADBS is not required. However, the Geotechnical Investigation indicated that on-site soils are corrosive to ferrous metals and aggressive to copper. The Project would comply with recommendations set forth in the Geotechnical Investigation and conditions of

the LADBS Approval Letter. In addition, prior to the issuance of grading permits, and in conformance with existing regulatory requirements, the City would require the Applicant to submit a design-level geotechnical engineering report to the LADBS for review and approval, which would include appropriate corrosion control methods to reduce corrosion. As such, the Project would not exacerbate existing environmental conditions related to corrosive soils. Therefore, the Initial Study concluded that impacts related to unstable, expansive, and corrosive soils would be less than significant.

The Project's wastewater demand would be accommodated by connections to the existing wastewater infrastructure. As such, the Initial Study concluded that the Project would not require the use of septic tanks or alternative wastewater disposal systems and would not result in impacts related to the ability of soils to support septic tanks or alternative wastewater disposal systems.

## **f. Hazards and Hazardous Materials**

The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction and operation of residential and commercial developments. All potentially hazardous materials to be used during construction and operation of the Project would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, state, and local regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations.

The use of film developing laboratory chemicals between the mid-1920s to the 1980s is considered a recognized environmental condition (REC) for the Project Site. Thus, a Phase II subsurface investigation was conducted to test for the presence of volatile organic compounds (VOCs) and tetrachloroethylene (PCE). Soil samples tested negative for VOCs and PCE. However, PCE was detected in soil vapor samples at a maximum concentration that exceeds the environmental screening level for residential uses. Since the proposed residential units would be located above ground floor commercial uses and an underground parking garage, the ventilation system within the parking garage and the multiple levels of space between the residential units would alleviate any potential hazards from soils that may contain residual PCE in soil vapors. Additionally, in conformance with existing regulatory requirements, soils that contain PCE vapors would be excavated for the construction of the parking garage in accordance with a soil management plan (SMP), which would include Project-specific soil-handling controls required for complying with local, state, and federal overseeing agencies. The SMP would prevent the risk of unacceptable exposure to contaminated soil and the improper disposal of contaminated soils. As such, the PCE detected in soil vapor beneath the site would not represent a hazard to the Project Site.

Asbestos was noted to be present in the three primary buildings on-site during a 1999 survey. As no significant renovations have taken place since that time, it is assumed that asbestos-containing materials (ACM) are still present on the Project Site. Thus, in accordance with SCAQMD Rule 1403, Asbestos Emissions from Demolition/Renovation Activities, prior to demolition activities associated with the Project, surveys of all buildings would be required to verify the presence or absence of any ACMs and conduct remediation or abatement before any disturbance occurs. Any ACMs would be removed by a licensed abatement contractor in accordance with all federal, state and local regulations prior to renovation or demolition. Mandatory compliance with applicable federal and state standards and procedures would reduce risks associated with ACM to less than significant levels.

Lead-based paint (LBP) could potentially be present within the structures given the age of the buildings to be removed. In compliance with existing regulatory requirements, prior to demolition activities associated with the Project, the Applicant would conduct surveys of all buildings to verify the presence or absence of any LBPs and conduct remediation or abatement before any disturbance occurs. Any LBPs would be removed by a licensed abatement contractor in accordance with all federal, state and local regulations prior to renovation or demolition. Mandatory compliance with applicable federal and state standards and procedures would reduce risks associated with LBP to acceptable levels.

Three pad-mounted LADWP transformers are located on-site, which could contain polychlorinated biphenyls (PCBs). In the event that PCBs are found, suspect materials would be removed in accordance with all applicable local, state and federal regulations prior to demolition activities. Specifically, the disposal of PCB wastes is regulated by 40 Code of Federal Regulations (CFR) 761 to ensure the safe handling of these materials. With compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of PCBs in the environment.

No evidence or records of underground storage tanks or aboveground storage tanks were found on the Project Site. In addition, the Project Site is not within an active or inactive oil field and is not within a Methane Zone or Methane Buffer Zone identified by the City, and the risk of subsurface methane release is negligible. Based on the above, with compliance with regulatory requirements, the Project would not result in a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; or in a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment. Thus, as concluded in the Initial Study, impacts related to the release of hazardous materials into the environment would be less than significant.

The Montessori Shir-Hashirim preschool is located approximately 0.2 mile northeast of the Project Site. As discussed above, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction and operation of residential and commercial developments. Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used in the vicinity of the Project Site. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste, and all materials during both construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable federal, state, and local regulations. Furthermore, truck haul routes during construction of the Project would likely be along Sunset Boulevard or Hollywood Boulevard to and from the Hollywood Freeway, and trucks would not travel adjacent to the school. As such, the Initial Study concluded that the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of a school, and impacts would be less than significant.

The Project Site is listed in the HAZNET database for generating 0.25 tons of ACM waste in 1994. Based on a lack of reported violations, this is not considered to represent a hazard to the Project Site. Various sites in the vicinity of the Project Site are listed in the databases as leaking underground storage tank (LUST) sites, Resource Conservation and Recovery Act (RCRA) enforcement actions and listed hazardous waste generators, and spill reports. However, the majority of these cases are in remediation or have been closed and none of them are considered to be an issue for the Project Site. Therefore, the Initial Study concluded that the Project would not create a significant hazard to the public or the environment associated with identification of the Project Site on a hazardous materials list.

The Project Site is not located within 2 miles of an airport, a private airstrip, or an airport planning area and would not result in a safety hazard for people residing or working in the area. Therefore, the Initial Study concluded that the Project would not result in a safety hazard for people residing or working in the Project area.

The Project Site is not located along a designated disaster route. The closest disaster routes include the Hollywood Freeway, approximately 0.5 mile east of the Project Site, and Santa Monica Boulevard, approximately 1.1 miles south of the Project Site. While it is expected that the majority of construction activities for the Project would be confined to the Project Site, temporary and limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially affect emergency access adjacent to the Project Site. However, access to the Project Site and surrounding area during construction of the Project would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. During operation, the Project does not propose the permanent closure of any local public streets, and access to the Project Site

would continue to be provided from Selma Avenue and Argyle Avenue. In addition, the Project would not install barriers that would impede emergency response within and in the vicinity of the Project Site. The Project would also be expected to provide adequate emergency access and comply with LAFD access requirements during operation. Therefore, the Initial Study concluded that the Project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan, and impacts would be less than significant.

There are no wildlands located in the vicinity of the Project Site. In addition, the Project Site is not located within a Very High Fire Hazard Severity Zone, but is located near a City-designated Fire Buffer Zone. However, the Project Site would be developed with new structures that would comply with LAMC and LAFD requirements pertaining to fire safety. Therefore, the Project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. As such, the Initial Study concluded that no impacts related to wildland fires would occur.

## **g. Hydrology and Water Quality**

Project construction would disturb more than 1 acre of soil and would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Construction Permit. In accordance with the requirements of the permit, a Stormwater Pollution Prevention Plan (SWPPP) would be developed and implemented during Project construction. The SWPPP would outline Best Management Practices (BMPs) including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff. The SWPPP would be carried out in compliance with State Water Resources Control Board (SWRCB) requirements and would also be subject to review by the City for compliance with the City of Los Angeles' *Best Management Practices Handbook, Part A Construction Activities*. Prior to the issuance of a grading permit, the Applicant would be required to provide the City with evidence that a Notice of Intent has been filed with the SWRCB to comply with the Construction General Permit. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. During operation, the Project would implement BMPs for managing stormwater runoff in accordance with the current City's Low Impact Development (LID) Ordinance requirements. If both infiltration and capture and use are determined to be infeasible due to the Project's design and subsurface conditions, the Project would propose the use of planter boxes to meet City LID requirements. Based on the above, the Initial Study concluded that compliance with existing regulatory requirements would ensure that impacts to surface water quality during construction and operation of the Project would be less than significant.

Groundwater was identified at 64 feet below grade surface (bgs) by the Geotechnical Investigation. The Project's maximum proposed excavation of up to 50 feet bgs is not anticipated to disturb the groundwater table during construction or operation, and the need for dewatering during construction or operation is not anticipated. Since there is greater than 10 feet of depth between the bottom of the subterranean structure and the top of the groundwater table, groundwater hydrology on-site would be minimally affected by the Project. In addition, implementation of the Project would decrease the amount of impervious surfaces on the Project Site compared to existing conditions. However, soils on the Project Site have a limited capacity to absorb stormwater during an intense rain event and are anticipated to runoff in a similar manner as impervious surfaces. As such, operation of the Project would not alter the existing limited groundwater recharge that occurs within the Project Site. Furthermore, as discussed above, in accordance with the City's LID Ordinance, the Project would include BMPs to treat stormwater. Therefore, the Project would not substantially interfere with groundwater recharge, and the Project would not substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in the aquifer volume or lowering of the local groundwater table. Therefore, the Initial Study concluded that impacts on groundwater would be less than significant.

Construction activities associated with the Project, which would involve removal of the existing structures and grading, have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils and modifying flow. In accordance with NPDES requirements, the Project would implement a SWPPP that would specify BMPs and erosion control measures to be used during construction to manage runoff flows so that runoff would not impact off-site drainage facilities and receiving waters. In addition, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. At buildout of the Project, the amount of impervious surface area would be reduced, which would decrease runoff volumes. However, as noted above, runoff from the on-site soils is anticipated to behave in a similar manner as runoff from impervious surfaces. Therefore, as stormwater flows from the Project Site would not increase with implementation of the Project, the Project would not affect the capacity of the existing stormwater infrastructure during a 50-year storm event. Based on the above, through compliance with all applicable NPDES requirements, including preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading regulations, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion, siltation, or on-site or off-site flooding would occur. Therefore, the Initial Study concluded that impacts would be less than significant.

The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles. As

such, the Project would not place housing within a 100-year flood hazard area or structures that would impede or redirect flood flows within a 100-year flood plain. In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a flood control basin. However, the Project Site is located within the potential inundation area for the Hollywood Reservoir, which is held by the Mulholland Dam. The Mulholland Dam is continually monitored and regularly inspected by the State of California Division of Safety of Dams and meets current safety regulations. In addition, the LADWP has emergency response plans to address any potential impacts to its dams. Given the oversight by the Division of Safety of Dams and the LADWP's emergency response program, the Initial Study concluded that the potential for substantial adverse impacts related to inundation at the Project Site as a result of dam failure would be less than significant.

The Project Site is located approximately 11.8 miles northeast of the Pacific Ocean. In addition, the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami. Given the Project Site's location approximately 1.3 miles south of the Hollywood Reservoir, the oversight of the Mulholland Dam, and LADWP's emergency response program, impacts from mudflow or a seiche occurring within the reservoir are unlikely. Therefore, the Initial Study concluded that seiche, tsunami, or mudflow events would not be expected to impact the Project Site, and impacts would not occur.

## **h. Land Use and Planning**

The Project Site is located in a highly urbanized area surrounded by existing and planned development containing a mix of residential, commercial, and entertainment-related uses. There is no existing residential use on the Project Site or a residential area that would be physically separated or otherwise disrupted by the Project as development of the Project would occur within the boundaries of the existing Project Site. Moreover, the proposed uses would be compatible with the variety of existing land uses and building types in the surrounding area. Therefore, the Project would not physically divide, disrupt, or isolate an established community. Rather, implementation of the Project would be compatible with the variety of existing land uses and building types in the surrounding area. Thus, the Initial Study concluded that impacts related to the physical division of an established community would be less than significant.

## **i. Mineral Resources**

No mineral extraction operations currently occur on the Project Site. The Project Site is located within an urbanized area and has been previously disturbed by development. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, within a

mineral producing area as classified by the California Geologic Survey, or within a City-designated oil field or oil drilling area. Therefore, the Initial Study concluded that no impacts related to mineral resources would occur.

## **j. Noise**

The Project Site is not located within an airport land use plan or within 2 miles of an airport. The nearest airport is the Burbank Bob Hope Airport located approximately 7.2 miles from the Project Site. The Project Site is also not located within the vicinity of a private airstrip. Therefore, the Initial Study concluded that the Project would not expose people working in the Project area to excessive noise levels from airports or airstrips, and no impacts would occur.

## **k. Population and Housing**

As discussed in the Initial Study, the development of 276 residential units would result in a net increase of approximately 671 residents on the Project Site. The Project would also develop 24,000 square feet of neighborhood-serving commercial retail and restaurant uses under the Retail/Restaurant Option or a 27,000 square-foot grocery store under the Grocery Store Option, which would generate approximately 65 or 73 employees respectively. The Initial Study concluded that the residents, households, and employees generated by the Project would be well within SCAG's population, household, and employment projections for the City of Los Angeles Subregion between 2016 and 2023.

Since the publication of the Initial Study, the baseline year has been updated from 2016 to 2017. Between 2017 and 2023, the 671 new residents generated by the Project would represent approximately 0.41 percent of the population growth forecasted in SCAG's 2016-2040 RTP/SCS for the City of Los Angeles Subregion. The Project's 276 new residential units would constitute up to approximately 0.35 percent of the household growth forecasted in SCAG's 2016-2040 RTP/SCS between 2017 and 2023 for the Subregion. Furthermore, the 65 employees generated by the Retail/Restaurant Option or the 73 employees generated by the Grocery Store Option would represent approximately 0.06 percent and 0.07 percent, respectively, of the employment growth forecasted by the 2016–2040 RTP/SCS between 2017 and 2023 for the Subregion. Therefore, the Project's residents and households would continue to be well within SCAG's population, household, and employment projections for the Subregion between 2017 and 2023. As such, the Initial Study concluded that the Project would not induce substantial direct or indirect population or housing growth, and impacts would be less than significant.

As no housing currently exists on the Project Site, the development of the Project would not displace any existing housing or cause the displacement of any persons or



require the construction of housing elsewhere. Therefore, the Initial Study concluded that no impacts would occur.

## I. Transportation

The Project Site is not located within the vicinity of any private or public airport. In addition, the Project's maximum height of 99 feet, 1 inch would not create increased levels of risk with respect to air traffic. Thus, the Initial Study concluded that no impacts would occur.

The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. The Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. Furthermore, the design and implementation of new driveways would comply with the City's applicable requirements, including emergency access requirements set for the Project by the LAFD. The Project design would also be reviewed by LADBS and LAFD during the City's plan review process to ensure all applicable requirements are met. In addition, the proposed uses are consistent with surrounding uses. Therefore, the Initial Study concluded that no impacts related to hazards from a design feature would occur.

During Project construction, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. In addition, appropriate construction traffic control measures would be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Operation of the Project would generate traffic in the Project vicinity and would result in some modifications to site access. However, the Project's driveways and internal circulation would comply with all City Building Code, Fire Code, and LADOT access requirements, including providing adequate emergency vehicle access. In addition, the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature. The Project also would not include the installation of barriers that could impede emergency vehicle access. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the Initial Study concluded that the Project would not result in inadequate emergency access during construction and operation, and impacts would be less than significant.

### **m. Utilities and Service Systems**

As discussed above in section 6.g, the Project would use planter boxes to meet the City's LID requirements. In addition, specific onsite improvements would include the installation of area drains, planter drains, and building roof drain downspouts throughout the Project Site and within the building to collect building, roof, and site runoff and direct stormwater through a series of storm drain pipes. This on-site stormwater treatment and conveyance system would accommodate the Project's stormwater flows. Therefore, the Project would not require the construction of new stormwater drainage facilities or expansion of existing facilities. Impacts would be less than significant.

The Project would require construction of new on-site telecommunications infrastructure to serve new buildings and potential upgrades and/or relocation of existing telecommunications infrastructure. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. However, the Project would prepare a Construction Traffic Management Plan pursuant to Project Design Feature TR-PDF-1, which would ensure safe pedestrian access as well as emergency vehicle access and safe vehicle travel in general, to reduce any temporary pedestrian and traffic impacts occurring as a result of construction activities. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration (i.e., months) and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would primarily take place on-site, with minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing energy and telecommunications lines would be coordinated with service providers.

The construction activities necessary to build the Project would generate debris, some of which may be recycled to the extent feasible. Pursuant to the requirements of SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. As analyzed in the Initial Study, after accounting for mandatory recycling, the Project would result in approximately 1,339 tons of construction and demolition waste. Given the remaining permitted capacity of approximately 57.56 million tons at the Azusa Land Reclamation facility, as well as the remaining capacity of 96.45 million tons at the Class III landfills open to the City according to the Los Angeles County Integrated Waste Management Plan (CoIWMP) 2015 Annual Report, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs. Since the publication of the Initial Study, Los Angeles County has released the CoIWMP 2016 Annual Report, which estimates that the remaining permitted

capacity of the Azusa Land Reclamation facility is 45.07 million cubic yards and the remaining capacity for County Class III landfills open to the City is 85.45 million tons, as of December 31, 2016.<sup>9</sup> The Azusa Land Reclamation facility and Class III landfills available to the City would continue to have sufficient capacity to accommodate the Project's approximately 1,339 tons of construction and demolition waste.

As analyzed in the Initial Study, upon full buildout, the Project would generate approximately 4,145 pounds of solid waste per day and would result in a net increase of approximately 2,376 pounds of solid waste per day or approximately 434.35 tons of solid waste per year. However, it is noted that the estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures. The estimated annual net increase in solid waste that would be generated by the Project represents approximately 0.02 percent of the City's 2015 annual solid waste disposal and less than 0.001 percent of the remaining capacity for the County's Class III landfills open to the City based on the capacity reported in the CoIWMP 2015 Annual Report. For the City's 2016 annual solid waste disposal<sup>10</sup> and the remaining capacity of 85.45 million tons for the County's Class III landfills open to the City as reported in the CoIWMP 2016 Annual Report, the Project's estimated annual net solid waste increase would also represent approximately 0.02 percent and less than 0.001 percent, respectively.

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste that would be generated by the construction and operation of the Project. Additionally, the County will continue to address landfill capacity through the preparation of CoIWMP annual reports. The preparation of each annual report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Therefore, the Initial Study concluded that impacts would be less than significant.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that developments include a recycling area or room of specified size on the Project Site. In addition, the Project would recycle construction materials in accordance with the

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<sup>9</sup> *County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017, Appendix E-2 Table 1.*

<sup>10</sup> *The City of Los Angeles disposed of approximately 2.74 million tons of waste in 2016 at Class III landfills. Source: County of Los Angeles, Department of Public Works, Solid Waste Information System, Detailed Solid Waste Disposal Activity Report By Jurisdiction of Origin, Jurisdiction: Los Angeles (Reporting Period: January 2016 to December 2016).*

City of Los Angeles Green Building Code (Ordinance No. 181,480), which requires a minimum construction waste reduction of approximately 50 percent. The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals by providing clearly marked, source sorted receptacles to facilitate recycling. Since the Project would comply with federal, state, and local statutes and regulations related to solid waste, the Initial Study concluded that impacts would be less than significant.

## **n. Wildfire**

As discussed above, in Section 6.f, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone,<sup>11</sup> nor is the Project Site is not located near state responsibility lands. The Project is, however, located near a City-designated Fire Buffer Zone.<sup>12</sup> Nevertheless, the Project Site would be developed with new structures that would comply with LAMC and LAFD requirements pertaining to fire safety. Therefore, the Project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. Impacts related to wildfire would be less than significant.

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<sup>11</sup> *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed February 25, 2019.*

<sup>12</sup> *City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.*