

## **V. Other CEQA Considerations**

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### **1. Summary of Significant Unavoidable Impacts**

Section 15126.2(b) of the *State CEQA Guidelines* requires that an EIR describe any significant impacts that 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.*

Based on the analysis in Chapter IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project and the Increased Commercial Flexibility Option (Flexibility Option) would result in a significant and avoidable impact with regard to groundborne vibration. The Project and the Flexibility Option would generate groundborne vibration levels during construction that could exceed the human annoyance threshold. No feasible mitigation measures are available to address this impact. However, this impact would be temporary and limited to times when the construction activities that generate the highest vibration levels are taking place, would be limited to site clearing, grading, and shoring activities, and would only occur during allowable construction hours of 7:00 A.M to 9:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday. Nonetheless, this impact would be significant and unavoidable.

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

Due to the similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option, the impacts of the Project and the Flexibility Option regarding the reasons the Project is being proposed notwithstanding significant unavoidable impacts would be essentially the same. Therefore, the conclusions regarding the analysis presented below for the Project would be the same under the Flexibility Option.

In addition to identification of the Project's significant unavoidable impacts, Section 15126.2(b) of the *State CEQA Guidelines* also requires a description of the reasons why a project is being proposed, notwithstanding significant unavoidable impacts associated with the project.

As discussed above, the Project would result in significant and unavoidable impacts related to groundborne vibration during construction related to human annoyance. The Project is being proposed notwithstanding this significant unavoidable impact because the Project would create new construction jobs and live/work units that would bring residents to the area to support area businesses and increase revenue for the City. As discussed in **Section II, Project Description**, of this Draft EIR, the Project would involve the redevelopment of a site currently containing an industrial warehouse and surface parking lot with a mixed-use building within a vibrant area of Downtown Los Angeles with a transit-oriented, high-density Project that would generate new economic opportunities for the Downtown area. In addition, the Project would provide new residential units to help support the demand for new housing in the region and City, and that of the Central City North Community Plan Area in particular.

The Project would provide an opportunity to fulfill policy directives reflected in both local and regional land use plans by concentrating mixed-use, pedestrian-friendly development, including affordable housing units, in an area that is targeted for higher density, urban growth. The Southern California Association of Governments' (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS) incorporates planning principles that call for compact, mixed-use, transit-oriented growth focused around city centers and existing transportation corridors, among other design concepts. Specifically, as discussed in **Section IV.G, Land Use**, of this Draft EIR, the Project Site is located in a High-Quality Transit Area (HQTAs) as designated by the 2016-2040 RTP/SCS. HQTAs are described as generally walkable transit villages or corridors that are within 0.5-mile of a well-served 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.

On September 3, 2020, SCAG approved and adopted the Connect SoCal 2020–2045 RTP/SCS. Similar to the 2016-2040 RTP/SCS, the newly adopted 2020-2045 RTP/SCS encompasses, builds upon and expands previous SCAG RTP/SCS plans' land use and transportation strategies to improve mobility options and achieve a more sustainable growth pattern. The Project is comprised of 185 live/work units, 20 live/work units deed restricted for Very Low Income households, and commercial uses, and the Project would be located in an urban area well-served by public transit provided by Metro, including several transit investment projects in planning phases. Furthermore, the integration of land uses on the Project Site would produce reductions in mode share to and from the Project Site that would help the region accommodate growth and meet the goals of the RTP/SCS that minimize per capita GHG emissions, and would therefore similarly not conflict with the goals of the 2020-2045 RTP/SCS. At the local level, the Project Site is located within a Transit Priority Area (TPA). TPAs are defined as an area within one-half mile of a major transit stop that is existing or planned. A major transit stop is a site

containing a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the AM and PM peak commute periods. The Project would be located in an area well-served by existing public transportation, including seven Los Angeles County Metropolitan Transit Authority (Metro) bus lines. The Project Site is located approximately 1-mile from the Metro Gold Line Tokyo/Arts District station. Public bus and rail transit station within the Study Area will also be improved with the Metro Regional Connector project, which will be a 1.9-mile underground light-rail system that will extend from the Metro Gold Line Little Tokyo/Arts District Station to the 7th Street/Metro Center Station, and the West Santa Ana Branch Transit Corridor project, which will be a new 20-mile light rail transit line that would connect downtown Los Angeles to southeast LA County. Thus, the Project would focus growth along major transportation corridors and within walking distance of a transit station.

In addition, the Project would provide pedestrian scale development with ground-level neighborhood-serving commercial retail uses and affordable housing units along Mateo Street and Imperial Street. Furthermore, the Project would be contemporary in style and constructed to incorporate environmentally sustainable design features required by the Los Angeles Green Building Code. Overall, the Project and Flexibility Option present many benefits that would override the limited adverse effects it may have on the environment.

### **3. Significant Irreversible Environmental Changes**

As the significant irreversible environmental changes under the Project and the Flexibility Option would be essentially the same, the below discussion applies to both the Project and the Flexibility Option.

Section 15126.2(c) of the *State CEQA Guidelines* states that the “uses 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.” Section 15126.2(c) further states “irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

The types and level of development associated with the Project would consume limited, slowly renewable, and non-renewable resources. 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, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the Project Site.

Construction of the Project would require consumption of resources that are not replenishable or that 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), petrochemical construction materials (e.g., plastics), and water. Fossil fuels, such as gasoline and oil, would also be consumed in the use of construction vehicles and equipment. The consumption of these resources would be spread out through the construction period.

Furthermore, the Project would comply with the Los Angeles Green Building Code, which would reduce resource consumption through compliance with energy efficiency requirements, such as reducing indoor and outdoor water demand, installing energy-efficient appliances and equipment, and complying with California Title 24 Building Energy Efficiency Standards, as adopted by the City. The Project would also meet the mandatory measures of the CALGreen Code as adopted by the City, by incorporating strategies such as high efficiency toilets, low-flow faucets, low-flow showers, and other energy and resource conservation measures. The heating, ventilation, and air conditioning (HVAC) system would be sized and designed in compliance with the CALGreen Code to maximize energy efficiency. In addition, the Project would achieve several objectives of the Framework Element, the 2016-2040 RTP/SCS, and the SCAQMD AQMP for establishing a regional land use pattern that promotes sustainability.

The commitment of resources required for the type and level of proposed development would limit the availability of these resources for future generations for other uses during the operation of the Project. The Project's continued use of non-renewable resources would be on a relatively small scale and consistent with regional and local growth forecasts in the area, as well as State and local goals for reductions in the consumption of such resources. The Project Site contains no energy resources that would be precluded from future use through Project implementation. Thus, the Project's and the Flexibility Option's irreversible changes to the environment related to the consumption of nonrenewable resources would not be significant, and the limited use of nonrenewable resources is justified.

## 4. Growth Inducing Impacts

As the growth-inducing impacts under the Project and the Flexibility Option would be essentially the same, the below discussion applies to both the Project and the Flexibility Option. Where slight numerical differences occur, they are identified and detailed within the discussion.

Section 15126.2(d) of the *State CEQA Guidelines* requires an EIR to discuss the ways in which a project could foster economic or population growth or the construction of

additional housing, either directly or indirectly, in the surrounding environment. Growth-inducing impacts include the removal of obstacles to population growth (e.g., the expansion of a wastewater treatment plant allowing more development in a service area) and the development and construction of new service facilities that could significantly affect the environment individually or cumulatively. In addition, pursuant to CEQA, growth must not be assumed as beneficial, detrimental, or of little significance to the environment.

### a) Direct Growth (Housing and Economic Growth)

The Project Site is currently developed with an industrial warehouse and associated parking lot. However, development of the Project would create new housing and residents and would add new employment at the Project Site.

The Project would include up to 185 live/work units, approximately 15,320 square feet of open space for residents, up to 23,380 square feet of commercial uses, and associated parking facilities in an up to 197,355-square-foot mixed-use building. The Project would provide housing for approximately 448 new residents and would generate approximately 92 net new employees<sup>1</sup> on the Project Site. The Flexibility Option would develop the same uses within the same proposed building envelope as proposed under the Project but would reduce the number of live/work units to up to 159 and would increase the size of the commercial uses to up to 45,873 square feet. The Flexibility Option would provide housing for approximately 385 new residents and would generate approximately 151 net new employees<sup>2</sup> on the Project Site.

As detailed in **Section IV.I, Population and Housing**, of this Draft EIR, while the Project does propose additional housing units, it would not substantially induce housing growth beyond forecasted levels. Instead, it would serve to meet a portion of housing demand currently forecasted for the City. Furthermore, the mixed-use Project would provide new housing and employment within the Central City North Community Plan Area and within a HQTAs, an area targeted for high-density development and near existing employment centers.

The Project would also foster economic growth and revitalize an area by adding businesses to the Project Site. Furthermore, the increased residential population would patronize local businesses and services in the area and would foster economic growth.

<sup>1</sup> As discussed through this Draft EIR, subsequent to the publication of the NOP, the existing warehouse has been vacated. In order to provide the most conservative estimate of employment impacts, this analysis assumes that there is no existing employment at the Project Site and the Project would result in an increase of all of the 92 employees that would be generated by the Project.

<sup>2</sup> As discussed through this Draft EIR, subsequent to the publication of the NOP, the existing warehouse has been vacated. In order to provide the most conservative estimate of employment impacts, this analysis assumes that there is no existing employment at the Project Site and the Flexibility Option would result in an increase of all of the 151 employees that would be generated by the Project.

The Project itself would be housing-rich by providing more housing units than jobs at the Project Site and would, therefore, support the anticipated population trends and SCAG efforts to improve the jobs/housing balance of local communities in the region and would support the attainment of SCAG policies by providing increased population density within a HQTAs.

The Project would include a mix of uses that would be compatible with adjacent uses and representative of the type of high-density and mixed-use development anticipated in the City of Los Angeles. The Project would conform to multiple Central City North Community Plan policies, which promote an arrangement of land uses, streets, and services, which would encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community for specific geographic areas. As discussed in detail and concluded in **Section IV.I, Population and Housing**, of this Draft EIR, the Project's new development would be consistent with the established SCAG regional forecast for the City, and would contribute to an infill growth pattern that is encouraged locally in the City by the Framework Element and the Central City North Community Plan. Accordingly, the Project and the Flexibility Option would not induce unanticipated direct growth.

### **b) Indirect Growth (Utility and Infrastructure Growth)**

Although the Project would provide new residential and commercial uses, it would not necessitate the extension of roads or other infrastructure. The Project's location near existing transit opportunities would increase those transit option's viability through increased ridership as a result of the introduction of new users, which would potentially reduce, rather than increase, the need for additional infrastructure. Street access and utilities are fully built-out in the area. Roadways and other infrastructure (e.g., water facilities, electricity transmission lines, natural gas lines, etc.) associated with the Project would not induce growth because the Project Site is located in a developed area of the City and connections to all local utility infrastructures, including water, wastewater, electricity, and natural gas, are readily available to the Project Site. Therefore, utility infrastructure would not be expanding into a new area as a result of the Project. The Project would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels, and that would result in an adverse physical change in the environment, or introduce unplanned infrastructure (see **Section IV.I, Population and Housing**, and **Section IV.G, Land Use and Planning**, of this Draft EIR). Therefore, the Project would not spur additional growth other than that already anticipated and would not eliminate impediments to growth. As such, the Project and the Flexibility Option would not foster indirect growth-inducing impacts.

## 5. Potential Secondary Effects of Mitigation Measures

As identified in **Chapter IV, Environmental Impact Analysis**, of this Draft EIR, the mitigation measures under the Project and the Flexibility Option would be essentially the same. As such, the potential secondary effects of their mitigation measures would also be essentially the same and the below discussion applies to both the Project and the Flexibility Option.

Section 15126.4(a)(1)(D) of the *State CEQA Guidelines* requires mitigation measures to be discussed in less detail than the significant effects of the proposed project if the mitigation measure(s) would cause one or more significant effects in addition to those that would be caused by the project as proposed. The analysis of Project impacts in **Chapter IV, Environmental Impact Analysis**, of this Draft EIR, resulted in recommended mitigation measures for several environmental topics, which are identified below. The following provides a discussion of the potential secondary effects on those topics that could occur as a result of implementation of the required mitigation measures. **For the reasons stated below, it is concluded that the Project's and the Flexibility Option's mitigation measures would not result in significant secondary impacts.**

### a) Cultural Resources

Mitigation Measure MM CUL-1 requires the Project to retain a Qualified Archaeologist to oversee archaeological monitoring during construction and conduct Archeological Sensitivity Training for construction personnel. MM CUL-2 establishes the protocol in the event that archeological resources are discovered during construction and includes protection, evaluation, notification, and treatment procedures. MM CUL-3 requires the preparation of a final report and appropriate California Department of Parks and Recreation Site Forms for submittal by the Applicant or its Successor to the Department of City Planning, the South Central Coastal Information Center, and representatives of other concerned agencies as appropriate. Mitigation Measure MM CUL-4 requires that, in the event that *Zanja* Conduit System-related infrastructure is unearthed, ground-disturbing activities be halted or diverted away from the vicinity and the Qualified Archaeologist coordinate with the Applicant or its Successor, the Department of City Planning, and the City's Office of Historic Resources to develop a formal treatment plan to mitigate impacts to the resource(s) in accordance with California Code of Regulations Section 15126.4(b)(A) and prepare a final report and appropriate California Department of Parks and Recreation Site Forms for the resource(s) to be submitted to the Department of City Planning and the South Central Coastal Information Center. As such, these measures represent procedural actions, which would not increase or generate additional environmental impacts, and would be beneficial in protecting archeological resources that

could potentially be encountered on-site. **Accordingly, implementation of MM CUL-1 through MM CUL-4 would not result in adverse secondary impacts.**

## **b) Geology and Soils**

Mitigation Measure MM GEO-1 requires the retention of a Qualified Paleontologist to provide technical and compliance oversight of all work as it relates to paleontological resources, including attending the Project kick-off meeting and progress meetings on a regular basis, conducting paleontological resources sensitivity training, overseeing paleontological monitoring to be conducted during all ground disturbing activities in sediments with high paleontological sensitivity (i.e. previously undisturbed older Alluvial sediments that exceed 15 feet in depth), conducting periodic spot checks of excavations to update recommended monitoring activities as needed, reporting to the Site should paleontological resources be uncovered, conducting assessments of and preparing treatment recommendations and curation for any discovered paleontological resource, and preparing a final monitoring and mitigation report for submittal to the City and appropriate repository. As such, this measure represents procedural actions, which would not increase or generate additional environmental impacts, and would be beneficial in protecting paleontological resources that could potentially be encountered on-site. **Accordingly, implementation of MM GEO-1 would not result in adverse secondary impacts.**

## **c) Noise**

Mitigation Measure MM NOI-1 requires the installation of a continuous sound barrier (such as ½-inch plywood) of at least 8 feet in height and capable of achieving a TL value of at least a 10 dBA.

This mitigation measure would be temporary and would be implemented in order to ensure that construction noise impacts would not impact the surrounding sensitive receptors. In addition, installation would be engineered and erected in accordance with applicable City building codes, the requirements of which are designed to prevent environmental impacts and would not increase or generate additional environmental impacts. **As such, this mitigation measure would not result in secondary impacts on the environment.**

## **6. Effects Found Not to be Significant**

Section 15128 of the *State 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.



## a) Project

An Initial Study was prepared for the Project and is included in **Appendix A.2** of the Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or not analyzed further in this Draft EIR. The City determined through the Initial Study that the Project would not have the potential to cause significant impacts to aesthetics; agriculture and forestry; air quality (odors); biological resources; geology and soils (fault rupture, landslides, erosion/loss of topsoil, and septic tanks); hazards (routine transport/use/disposal of hazardous materials, proximity to schools/airports/private airstrip, and wildfire); hydrology and water quality (flooding and seiche/tsunami/mudflow); land use and planning (community division, and conflict with habitat/natural community conservation plans); mineral resources; noise (airport/airstrip); population and housing (displacement); and transportation/traffic (air traffic patterns, and design features). For further discussion of these issues and more detailed evaluation of potential impacts, refer to the Project's Initial Study, provided in **Appendix A.2** of this Draft EIR.

## b) Increased Commercial Flexibility Option

The Flexibility Option would be located on the same Project Site as the Project and the overall design, configuration, and operation of the Flexibility Option would be comparable to the Project. Although there would be an increase in commercial square footage and a reduction in total live/work units, the building parameters would remain unchanged. Additionally, the amount of both common and private open space provided under the Flexibility Option would be similar to the Project. However, since the Flexibility Option was not specifically addressed in the Initial Study, with the exception of environmental topics that were entirely scoped out of the EIR (aesthetics, agriculture and forestry, biological resources, and mineral resources), all environmental issues identified above that were eliminated for evaluation in the EIR for the Project were fully analyzed for the Flexibility Option in their respective **Chapter IV, Environmental Analysis**, sections of this EIR. With regard to aesthetics, the Flexibility Option would be constructed within the same building envelope and would include the same materials and lighting as the Project. With regard to agriculture and forestry, biological resources, and mineral resources, the Flexibility Option would be located on the same Project Site with the same setting and existing conditions and would include the same uses as the Project. There would be no differences in the construction or operation of the Flexibility Option compared to the Project that would have the potential to alter the Project's potential to result in impacts related to aesthetics, agriculture and forestry, biological resources, or mineral resources. Therefore, no further environmental review of these same issues for the Flexibility Option in the Draft EIR is necessary and the analyses and conclusions presented in the Project's

Initial Study (**Appendix A.2**) are equally applicable to the Flexibility Option and, accordingly, all the conclusions apply to both the Project and Flexibility Option.

## 7. Mandatory Findings of Significance

As the impacts under the Project and the Flexibility Option would be essentially the same, the mandatory findings of significance under the Project and the Flexibility Option would also be essentially the same. Therefore, the below discussion applies to both the Project and the Flexibility Option.

Section 15065 of the *State CEQA Guidelines* requires preparation of an EIR when certain specified impacts may result from construction or implementation of a project. An EIR has been prepared for the Project, including the Flexibility Option, which fully addresses all of the Mandatory Findings of Significance, as described below.

***The Project has the potential to substantially degrade the quality of the environment.***

*State CEQA Guidelines* Section 15065(a) requires a finding of significance if a project “has the potential to substantially degrade the quality of the environment.” In practice, this is the same standard as a significant effect on the environment, which is defined in *State CEQA Guidelines* Section 15382 as “a substantial or potentially substantial adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance.”

This EIR, in its entirety, addresses and discloses all potential environmental effects associated with construction and operation of the Project, including direct, indirect, and cumulative impacts in the following resource areas:

- Air Quality
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Transportation
- Tribal Cultural Resources

- Utility and Service Systems
- Energy
- Wildfire

As described in **Section IV.H, Noise**, of this Draft EIR, there are no feasible mitigation measures to reduce the temporary groundborne vibration impacts associated with on-site construction of the Project. **As such, groundborne vibration impacts from on-site construction would remain significant and unavoidable.**

As detailed in the remaining sections of this Draft EIR, all other impacts would be less than significant or reduced to a less-than-significant level through the mitigation measures detailed in their respective sections and listed in **Table ES-1, Summary of Project Impacts**, in the **Executive Summary** of this Draft EIR.

***The Project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal.***

As detailed in the biological resources analysis contained in the Initial Study (**Appendix A.2**) and as described above, the Project would not: adversely affect special status species or their habitat, riparian habitat or other sensitive natural communities, or protected wetlands; interfere with the movement of resident or migratory fish or wildlife; impede the use of native wildlife nursery sites; conflict with local policies or ordinances protecting biological resources or the provisions of adopted or approved local, regional, or State habitat conservation plans; or contribute to a cumulative impact to biological resources, and no mitigation measures are required. **Accordingly, the Project and the Flexibility Option would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal.**

***The Project would not eliminate important examples of the major periods of California history or prehistory.***

As described in **Section IV.B, Cultural Resources**, of this Draft EIR, the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section CEQA Guidelines 15064.5. However, construction of the Project would excavate into sediments sensitive for archaeological resources and would potentially encounter the *Zanja* during construction activities. Mitigation measures would reduce potential impacts to archaeological resources, including the *Zanja*, to less than significant levels. **Accordingly, the Project and the Flexibility Option would not**

eliminate important examples of the major periods of California history or prehistory.

***The Project has impacts that are individually limited, but cumulative considerable.***

*State CEQA Guidelines* Section 15065 states that a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has potential environmental effects that are individually limited but cumulatively considerable. As defined in *State CEQA Guidelines* Section 15065(b), cumulatively considerable means “that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” Cumulative impacts are addressed for each of the environmental topics listed above and are provided in **Chapter IV, Environmental Impact Analysis, Section IV.A through Section IV.O**, of this Draft EIR.

As detailed in these and in the remaining sections of this Draft EIR, all cumulative impacts would be less than significant or reduced to a less than significant level through the mitigation measures detailed in their respective sections and listed in **Table ES-1, Summary of Project Impacts**, in the **Executive Summary**, of this Draft EIR. **Accordingly, the Project and the Flexibility Option would not have impacts that are cumulatively considerable.**

***The Project has environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.***

As required by *State CEQA Guidelines* Section 15065(a)(4), a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to cause substantial adverse effects on human beings, either directly or indirectly. Under this standard, a change to the physical environment that might otherwise be minor must be treated as significant if people would be significantly affected. This factor relates to adverse changes to the environment of human beings generally, and not to effects on particular individuals. While changes to the environment that could indirectly affect human beings would be represented by all of the designated CEQA issue areas, those that could directly affect human beings include air quality, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, population and housing, public services, transportation, utilities and service systems, energy, and wildfire. These changes are addressed in **Sections IV.A, Air Quality; IV.C, Geology and Soils; IV.D, Greenhouse Gas Emissions; IV.E, Hazards and Hazardous Materials; IV.F, Hydrology and Water Quality; IV.H, Noise; IV.I, Population and Housing; IV.J, Public Services; IV.K,**

**Transportation; IV.M, Utilities and Service Systems; IV.N, Energy; IV.O, Wildfire, and V, Other CEQA Considerations**, of this Draft EIR.

As described in **Section IV.H, Noise**, of this Draft EIR, there are no feasible mitigation measures to reduce the temporary groundborne vibration impacts associated with on-site construction of the Project. **As such, groundborne vibration impacts from on-site construction would remain significant and unavoidable.**

As detailed in the remaining sections of this Draft EIR, all other impacts would be less than significant or reduced to a less-than-significant level through the mitigation measures detailed in their respective sections and listed in **Table ES-1, Summary of Project Impacts**, in the **Executive Summary**, of this Draft EIR.

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