

VI. Other CEQA Considerations

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1. Significant Unavoidable Impacts

CEQA Guidelines Section 15126.2(b) 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 impacts that cannot be feasibly mitigated with regard to on-site construction noise, on-site construction vibration (human annoyance), and intersection levels of service. Implementation of the Project would result in significant cumulative impacts that cannot be feasibly mitigated with regard to on-site construction noise, off-site operational noise, and intersection levels of service.

a. On-Site Construction Noise

As discussed in Section IV.G, Noise, of this Draft EIR, implementation of Mitigation Measure NOI-MM-1 provided therein would reduce the Project's and cumulative construction noise levels to the extent feasible. Specifically, implementation of Mitigation Measure NOI-MM-1 (installation of temporary sound barriers) would reduce the noise generated by on-site construction activities at the off-site sensitive uses, by a minimum 15 dBA at the residential use on 17th Place north of the Project Site (receptor location R1). However, the construction-related noise at receptor location R1 would still exceed the significance threshold by 9.3 dBA. The noise impacts at location R1 would be temporary when construction equipment is operating at the northern portion of the Project Site with direct line-of-sight to the receptor location R1. However, there are no other feasible mitigation measures to further reduce the construction noise at location R1 to below the significance threshold. Therefore, construction noise impacts associated with on-site noise sources would remain significant and unavoidable.

b. On-Site Construction Vibration (Human Annoyance)

As discussed in Section IV.G, Noise, of this Draft EIR, estimated ground-borne vibration levels would be up to 78 VdB at receptor location R1 and up to 69 VdB at receptor location R3, which would exceed the 72 VdB and 65 VdB significance criteria pursuant to human annoyance, respectively. The vibration exceedance would occur during the demolition and grading/excavation phases with large construction equipment (i.e., large bulldozer, caisson drilling, and loaded trucks) operating within 80 feet of the receptor location R1 and within 140 feet of receptor location R3. As discussed in Section IV.G, Noise, of this Draft EIR, 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 vibration impacts from on-site construction activities with respect to human annoyance would be significant and unavoidable.

c. Off-Site Operational Noise

As discussed in Section IV.G, Noise, of this Draft EIR, Project-level operational noise impacts would be less than significant, but the Project and related projects in the area would produce traffic volumes (off-site mobile sources) that would generate roadway noise. Cumulative traffic volumes would result in an increase ranging from 0.6 dBA (CNEL) along the roadway segment of Central Avenue (between 6th Street and 7th Street), to 3.2 dBA (CNEL) along the roadway segment of Mateo Street (between 6th Street and 7th Street). The estimated noise traffic noise levels would exceed the 3-dBA significance criteria (applicable when noise levels fall within the normally unacceptable or clearly unacceptable land use category) along the roadway segments of Mateo Street (between 6th and 7th Streets) and Santa Fe Avenue (between 7th Street and 8th Street). Conventional mitigation measures, such as providing noise barrier walls to reduce the off-site traffic noise impacts, would not be feasible as the barriers would obstruct the access and visibility to the properties along the affected roadways. There are no other feasible mitigation measures to reduce the significant impacts associated with the cumulative off-site traffic noise. Therefore, potential impacts associated with the cumulative off-site traffic noise would remain significant and unavoidable and the Project's contribution would be cumulatively considerable.

d. Transportation

As discussed in Section IV.I, Transportation, of this Draft EIR, with implementation of Mitigation Measure TR-MM-1, the estimated total daily vehicle trips are projected to be reduced to 4,926 and the estimated total daily VMT reduced to 34,480. The daily work VMT per employee is estimated to be reduced by 18 percent to 7.5, which would no longer be a significant impact under the City's criteria. The daily household VMT per capita is projected

to be reduced to 7.7, which is a reduction of 17 percent from the unmitigated value of 9.3, but would still constitute a significant impact under the City's criteria. Therefore, impacts would be 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, CEQA Guidelines Section 15126.2(b) requires that an EIR describe the reasons why a project is being proposed, notwithstanding the effects of the identified significant and unavoidable impacts. The reasons why the Project has been proposed are grounded in a comprehensive list of project objectives included in Section II, Project Description, of this Draft EIR.

As discussed in Section II, Project Description, of this Draft EIR, underlying purpose of the Project is to redevelop vacant and underutilized parcels into a high-density, mixed-use development that provides housing and jobs in the Arts District within the Central City North Community Plan area. The underlying purpose and objectives of the Project are closely tied to the goals and objectives of the Central City North Community Plan, which supports the objectives and policies of applicable larger-scale regional and local land use plans, including SCAG's 2016-2040 Regional Transportation Plan/Sustainability Communities Strategy (2016–2040 RTP/SCS) and the City's General Plan.

The 2016–2040 RTP/SCS identifies mobility, accessibility, sustainability, and high quality of life, as the principles most critical to the future of the region. Further, it balances the region's future mobility and housing needs with economic, environmental, and public health goals. Within the 2016–2040 RTP/SCS, the overarching strategy includes plans for "High Quality Transit Areas," "Livable Corridors," and "Neighborhood Mobility Areas" as key features of a thoughtfully planned, maturing region in which people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life. In support of the vision of SCAG's 2016–2040 RTP/SCS, the Project would focus housing and employment growth within a High Quality Transit Area (HQTA), which would promote SCAG's objective to maximize mobility and accessibility for the region. The Project would also support SCAG's goal to provide sustainable communities by creating an environmentally sensitive development. Specifically, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would

include, but would not be limited to high-efficiency toilets, low-flow showerheads, drip/subsurface irrigation, drought tolerant plants, and a weather-based irrigation system.

With regard to the City's General Plan, the Project would be consistent with the policies set forth in the City's General Plan Housing Element by providing 347 new live-work units in close proximity to transit. In addition, in accordance with the objectives of the General Plan Framework Element and the Housing Element, the Project would promote sustainable neighborhoods that accommodate a diversity of uses by redeveloping underutilized and vacant parcels with 347 new live-work units, 187,374 square feet of office uses, 21,858 square feet of retail/restaurant uses, and 926-square-foot community room residents could use for art production, which would provide housing, jobs, and amenities.

Furthermore, consistent with the objective of the Central City North Community Plan to strengthen commercial development opportunities, the Project would provide 209,232 square feet of new commercial and office space, including office, retail, and restaurant uses. The Project would also support the objectives of the Central City North Community Plan to promote and ensure the provision of adequate housing for all persons by providing a mix of housing options, including different sizes and configurations.

Based on the above, the Project reflects a development that is consistent with the overall vision of the City and SCAG to locate supporting and synergistic uses within one site to create sustainable communities and enhance quality of life throughout the City and the region. As such, the benefits of the Project, as outlined above, would outweigh the effects of the significant and unavoidable impacts of the Project. Furthermore, as detailed in Section V, Alternatives, of this Draft EIR, no feasible alternative was identified that would eliminate all of the Project's significant and unavoidable impacts.

3. Significant Irreversible Environmental Changes

CEQA Guidelines Section 15126.2(c) 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. Irrecoverable 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 not consume a large commitment of natural resources or 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).

The Project's potential impacts related to solid waste are addressed in the Initial Study prepared for the Project, which is included as Appendix A to this Draft EIR. As discussed therein, during construction of the Project, a minimum of 75 percent of construction and demolition debris would be diverted from landfills. 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 goals to divert waste. Thus, the consumption of non-renewable building materials such as aggregate materials and plastics would be reduced.

b. Water

Consumption of water during construction and operation of the Project is addressed in Section IV.K.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), as confirmed by the Water Supply Assessment prepared for the Project and included as Appendix P of this Draft EIR. 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, the Project would implement a variety of sustainable features related to water conservation to reduce indoor water use, as set forth in Section II, Project Description, and Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. 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. The Project would also implement Project Design Feature WAT-PDF-1, which includes water conservation measures in excess of code requirements. Thus, as evaluated in Section IV.K.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

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.C, Energy, 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 147,727 gallons of gasoline and approximately 351,168 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.002 percent of the 2024 annual on-road gasoline-related energy consumption and 0.03 percent of the 2024 annual diesel fuel-related energy consumption in Los Angeles County.¹ Furthermore, as detailed in Section IV.C, Energy, of this Draft EIR, a total of approximately 64,697 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. In addition, trucks and equipment used during construction activities would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Further, on-road vehicles (i.e., haul trucks, worker vehicles) would be subject to federal fuel efficiency requirements. Therefore, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Thus, impacts related to the consumption of fossil fuels during construction of the Project would be less than significant.

¹ Refer to Appendix D of this Draft EIR for detailed energy calculations.

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 (SoCalGas), respectively. Specifically, the Project's electricity and natural gas demand would represent 0.03 and 0.001 percent, respectively, of LADWP and SoCalGas' projected sales in 2024. In addition, as discussed in Section IV.C, Energy, of this Draft EIR, the Project would comply with 2019 Title 24 standards and applicable 2019 CALGreen requirements. Gasoline and diesel fuel consumption during operation are estimated to be 252,708 gallons and 46,096 gallons, respectively, which would account for 0.004 percent of gasoline and diesel fuel consumption in Los Angeles County. In addition, as noted above, the Project is located in an HQTAs and includes a number of features that would reduce the number of vehicle miles traveled (VMT) such as increase density, a mixed-use development, and increased destination and transit accessibility.

Therefore, based on the above, the Project would not cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F to the CEQA Guidelines. In addition, Project operations would not conflict with adopted energy conservation plans. Refer to Section IV.C, Energy, 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, 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 in residential and commercial developments. Specifically, operation of the Project would be expected to involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, 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 irreversible 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

CEQA Guidelines Section 15126.2(d) 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 347 new live/work units. According to the Department of City Planning, the estimated household size for multi-family housing units in the City of Los Angeles area is 2.42 persons per unit.² Applying this factor, development of 347 live/work units would result in an increase of approximately 840 new residents.³ 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

² *Based on a rate of 2.42 persons per multi-family unit based on the 2017 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.*

³ *347 live/work units x 2.42 persons per unit = 840 persons.*

the City of Los Angeles Subregion in 2018 is approximately 4,009,193 persons.⁴ In 2024, the projected buildout year of the Project, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,172,886 persons.⁵ Thus, the estimated 840 new residents generated by the Project would represent approximately 0.51 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2018 and 2024. 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.

Based on employee generation rates included in the 2018 Los Angeles Unified School District's (LAUSD) Developer Fee Justification Study, the Project's 187,374 square feet of new office space, 21,858 square feet of new retail/restaurant floor area, and 926-square-foot community room would generate approximately 961 net new employees.⁶ According to the 2016–2040 RTP/SCS, the employment forecast for the Subregion is approximately 1,797,693 employees in 2018 and approximately 1,898,986 employees in 2024, which means the Project's 961 estimated new employees would represent approximately 0.95 percent of the employment growth forecasted (from 2018–2024) by the

⁴ *Based on a linear interpolation of 2012–2040 data.*

⁵ *Based on a linear interpolation of 2012–2040 data.*

⁶ *The 2018 LAUSD Developer Fee Justification Study does not include an employee generation rate for artist production space. To provide a conservative estimate, the highest generation rate (i.e., Standard Commercial Office) was used.*

2016–2040 RTP/SCS.⁷ Therefore, the Project would not cause an exceedance of SCAG’s employment projections contained in the 2016–2040 RTP/SCS.

In addition, the proposed office, commercial, and community room 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 that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, the potential growth associated with 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 then-existing vacancies in the housing market and others by any new residential developments that may occur in the vicinity of the Project Site. As such, the Project’s office, commercial, and artist amenity 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 a mix of residential, commercial, and industrial 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 would require 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 would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of VMT. In addition, the Project would not require any major roadway improvements nor would the Project open any large undeveloped areas for new use. Any access improvements would be limited to driveways necessary to provide immediate

⁷ *Based on a linear interpolation of 2012–2040 data.*

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

CEQA Guidelines Section 15126.4(a)(1)(D) 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 archeologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. If archeological materials are encountered, the archeologist 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 then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. This mitigation measure represents procedural actions and would be beneficial in protecting archaeological resources that could potentially be encountered on-site. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

b. Geology and Soils

Mitigation Measure GEO-MM-1 states that a qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. 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 then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. This mitigation measure represents procedural actions and would be beneficial in protecting cultural resources that could potentially be encountered on-site. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

c. Noise

Mitigation Measure NOI-MM-1 requires temporary and impermeable sound barriers to be installed during construction along the northern property line of the Project Site between the construction areas and the residential use on the north side of 7th Place. The noise and vibration from installation of the temporary sound barrier would be short-term and would be required to comply with the City's noise thresholds as described in Section 3.1.(2) of Section IV.G, Noise, of this Draft EIR. 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 long term secondary impacts.

d. Transportation

Mitigation Measure TR-MM-1 requires the implementation of a Transportation Demand Management Program that includes strategies to promote non-auto travel and reduce the use of single-occupant vehicle trips. Implementation of Mitigation Measure TR-MM-1 would be beneficial in addressing the Project's transportation impacts during operation and would not result in any physical improvements. As such, implementation of Mitigation Measure TR-MM-1 would not result in adverse secondary impacts.

6. Effects Not Found to Be Significant

CEQA Guidelines Section 15128 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 agricultural and forest resources; objectionable odors; biological resources, including potential conflicts with habitat conservation plans and natural community conservation plans; geology and soils; hazards and hazardous materials; hydrology and water quality; physical division of an established community; mineral resources; airport and airstrip noise; population and housing; change in air traffic patterns; hazardous design features; emergency access; stormwater drainage facilities;

and solid waste.⁸ A summary of the analysis provided in Appendix A for these issue areas is provided below.

In addition, subsequent to the publication of the Initial Study, it was determined the Project is located in a Transit Priority Area pursuant to Senate Bill (SB) 743 and City of Los Angeles Zoning Information File (ZI) No. 2452. SB 743 adds Public Resources Code (PRC) Section 21099, which provides 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.”⁹ A “transit priority area” is defined as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.”¹⁰ PRC Section 21064.3 defines “major transit stop” as “a site containing an existing 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 A.M. and P.M. peak commute periods.”¹¹

The Project proposes the construction of a mixed-use residential development consisting of 347 new live-work units, and approximately 187,374 square feet of new office space, 21,858 square feet of new commercial floor area, and a 926-square-foot community room that residents could use for art creation. Public transit service in the vicinity of the Project Site is currently provided by multiple local and regional bus lines, several of which provide connections to Downtown subway stations, including the Metro Red/Purple Lines Pershing Square Station and the Metro Red/Purple/Blue/Expo Lines 7th Street/Metro Center Station. In particular, the Los Angeles County Metropolitan Transportation Authority (Metro) provides a bus stop for Metro Local Line 60 located at the corner of South Santa Fe Avenue and Violet Street, which is the closest bus stop approximately 200 feet west of the Project Site. Other nearby transit lines include Metro Local Line 18, which provides service east/west from the City of Montebello to the Wilshire Center area, and Metro Local Line 62, which provides service from Downtown Los Angeles, east to Santa Fe Springs, and south to Hawaiian Gardens. A bus stop for both Local Lines 18 and 62 is located at 7th Street and Santa Fe Avenue, approximately 700 feet northwest of the Project Site. Additionally, the Greyhound Bus Terminal is located approximately 0.4 mile northwest of the Project Site

⁸ *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.*

⁹ *PRC Section 21099(d)(1).*

¹⁰ *PRC Section 21099(a)(7).*

¹¹ *PRC Section 21064.3.*

on 7th Street, which provides inter-city bus service to various locations outside of the Los Angeles metropolitan area. Therefore, the Project is located in a TPA as defined in PRC Section 21099 and confirmed by the City of Los Angeles Zone Information Map Access System (ZIMAS).¹² As such, the Project's aesthetic and parking impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099.

a. Aesthetics

As noted above, the Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. The following discussion is provided for informational purposes only.

(1) Scenic Vistas

In the vicinity of the Project Site, panoramic views of nearby scenic vistas, including the Downtown skyline, San Gabriel Mountains, and the Los Angeles River, are limited, partial, distant, and/or non-existent due to the predominantly flat terrain of the Project vicinity and the intervening developments that block long-range, expansive views. In addition, although the Los Angeles River is located adjacent to the Project Site, this portion of the river is channelized and does not possess natural or scenic value. Furthermore, due to flat terrain, the location of the rail lines, and existing development, panoramic views of the Los Angeles River along with the Project Site are generally not available in the Project vicinity. Therefore, the Project would not have a substantial adverse effect on a scenic vista.

(2) Scenic Resources Within a State Scenic Highway

The Project Site is not located along a scenic highway as designated by the State. Therefore, the Project would not substantially damage scenic resources, including trees, rock outcroppings, and historic buildings or other locally recognized desirable aesthetic natural feature within a scenic highway.

(3) Conflict With Applicable Zoning and Other Regulations Governing Scenic Quality

As discussed in Section IV.F, Land Use, of this Draft EIR, with approval of the requested discretionary actions, including the proposed General Plan Amendment to

¹² City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 2141 Violet Street, <http://zimas.lacity.org/>, accessed April 8, 2020. The address 2143 Violet Street is not listed in ZIMAS. However, the Project Site includes 2117-2147 E. Violet Street and 2118-2142 E. 7th Place.

change the land use designation from Heavy Industrial to Regional Center Commercial and Vesting Zone and Height District Change from M3-1-RIO to C2-2-RIO, the Project would not conflict with applicable zoning for the Project Site. The Project would also not conflict with other regulations governing scenic quality including the River Improvement Overlay (RIO) District, the Citywide Design Guidelines, and the Walkability Checklist, each of which are discussed further below.

(a) River Improvement Overlay District

The Project Site is located within the RIO District and would be required to comply with the Los Angeles River Design Guidelines, which establishes best practices for designing development projects located within the RIO District. The Los Angeles River Design Guidelines illustrate options, solutions, and techniques to improve the aesthetic quality of the Los Angeles River and its surrounding communities. The Los Angeles River Design Guidelines consist of overarching objectives followed by a list of specific implementation strategies. These strategies specifically address river-adjacent development. Although the Project is located within the boundaries of the RIO District, the Project Site is separated from the Los Angeles River by existing rail lines and is not immediately adjacent to the River. Nevertheless, the Project would further the relevant objectives, including employing high quality, attractive and distinguishable architecture (Objective 2) and minimizing the quantity and appearance of parking and loading areas by locating all parking and loading areas underground or screened from public view (Objective 4). Therefore, the Project would not conflict with the RIO District.

(b) Citywide Design Guidelines

The Citywide Design Guidelines are intended as performance goals and not zoning regulations or development standards. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case.¹³ The Project is concluded to be consistent with the six objectives of the Citywide Design Guidelines for residential projects, as discussed below.

Objective 1: Consider Neighborhood Context and Linkages in Building and Site Design.

The Project would construct a high-density mixed-use development on an infill site, which would create a more cohesive and vibrant street environment along East 7th Place and Violet Street when compared to the existing conditions on the Project Site. The Project

¹³ *City of Los Angeles Department of City Planning, Commercial Citywide Design Guidelines, Pedestrian-Oriented/Commercial and Mixed-Use Projects, May 2011, p. 5; and Residential Citywide Design Guidelines, Multi-Family Residential & Commercial Mixed-Use Projects, May 2011, p. 5.*

would create a strong street wall along Violet Street by minimizing building setbacks. To create a more pedestrian-friendly environment and encourage pedestrian activity, the Project's retail/restaurant uses would be located on the ground level and would feature floor to ceiling window walls. Landscaping would be installed to improve the streetscape environment adjacent to the Project Site. The proposed new buildings would be integrated with the existing buildings on the Project Site and the heights of the proposed buildings would be generally consistent with the existing and proposed developments in the surrounding area. The architectural design for both new buildings would utilize staggered levels, projection balconies, and recessed window elements to articulate the building facades and reduce the building scale and massing. In addition, the office building would step down to three stories towards East 7th Place to provide a buffer for the lower-scaled developments along East 7th Place. The Project would also include a ground-level pedestrian paseo system with art exhibition spaces, landscaped planters, and various gathering and seating areas, that would connect the existing commercial, office, and residential uses to the new buildings and provide pedestrian access to each of the Project's street frontages, as well as to the abutting alley.

Objective 2: Employ High Quality Architecture to Define the Character of Commercial Districts/Employ Distinguishable and Attractive Building Design.

The Project Site is located in a highly urbanized Arts District, which has undergone substantial change over the last few years, resulting in a significant amount of residential and commercial redevelopment. This area continues to be transformed and improved by recently approved and proposed new developments that incorporate mixed uses within mid- and high-rise buildings featuring high-quality, contemporary architectural design elements. The contemporary architectural style of the proposed buildings would reflect the industrial character of the surrounding area by utilizing a repetition of stacked components to imitate the structural rhythm and cadence of stacked pallets. The materials used on the building exteriors would include concrete, glass, and metal. Each building level would be staggered to break up the building façades, creating distinct and offset planes to reduce the building's perceived scale and massing, as well as large projection balconies that provide functional outdoor open space. Recessed window elements would be used to produce a pattern of void and solid, which would articulate the building facades, create texture, and reduce massing.

Objective 3: Augment the Streetscape Environment with Pedestrian Amenities/Provide Pedestrian Connections Within and Around the Project.

The Project would provide landscape improvements and streetscape amenities, including landscaped planters and street trees along Violet Street. Pedestrian access within the Project Site would be provided via a new paseo that connects the existing buildings with the proposed buildings. The entrance to the residential lobby would be located on the eastern side of the residential tower. Primary pedestrian access to the office

component would be from an office lobby located along Violet Street within the northeastern corner of the Project site. Access to the retail/restaurant spaces would be provided via several entrances along the paseo system. This paseo also provides pedestrian access to the East 7th Place, Violet Street, and the abutting alley. The enhanced pedestrian environment would encourage non-automobile travel and reduce VMT.

Objective 4: Minimize the Appearance of Driveways and Parking Areas.

The Project would provide a residential parking entrance from the alley and an office parking entrance off of Violet Street. All vehicular parking would be located within the six subterranean parking levels.

Objective 5: Include Open Space to Create Opportunities for Public Gathering/
Utilize Open Areas and Landscape Opportunities to their Full Potential.

The Project would provide a publicly accessible pedestrian paseo system on the ground level with art exhibition spaces, landscaped planters, and various gathering and seating areas. Other open space and recreational amenities would include residential indoor common amenity spaces on Level 9 of the residential tower and on Level 8 of the office building, and outdoor amenities for both residents and office tenants on Levels 4 and 8 of the office building. The outdoor amenities on Level 4 of the office building would be comprised of seating areas, an outdoor kitchen, and a fire pit, and Level 8 of the office building would include a swimming pool, lounge areas with fire pits and BBQs, and a variety of other landscaped and programmed open spaces. In addition, private residential balconies would be provided throughout the residential tower. Overall, the Project would provide approximately 71,719 square feet of open space, which exceeds the open space requirements set forth by LAMC Section 12.21 G. In addition, the Project would install street trees and landscaped planters along Violet Street.

Objective 6: Improve the Streetscape Experience by Reducing Visual Clutter.

All proposed signage on the Project Site would be designed in conformance to applicable LAMC requirements. The Project would include low-level exterior lights on the proposed building for security and way-finding purposes. Project lighting would be designed to minimize light trespass from the Project Site. Low-level accent lighting to accent signage, architectural features, and landscape elements would also be incorporated. The Project would also screen any necessary rooftop equipment and locate trash enclosures and utility areas within the building so as not to detract from the visual character of the Project Site. In addition, all major utilities would be placed underground and all equipment and trash areas would be required to be screened from public view. The enhanced pedestrian environment would encourage non-automobile travel and reduce VMT.

(c) City of Los Angeles Walkability Checklist

The Walkability Checklist consists of a list of design elements intended to improve the pedestrian environment, protect neighborhood character, and promote high quality urban form. As stated within the Walkability Checklist, while each of the implementation strategies should be considered for a project, not all will be appropriate for every project, and each project will involve a unique approach. The Walkability Checklist is tailored primarily for the new construction of residential and commercial mixed-use use projects. The Walkability Checklist addresses the following topics, each of which is discussed further below, as applicable: sidewalks; crosswalks/street crossings; on-street parking; utilities; building orientation; off-street parking and driveways; on-site landscaping; building façade; and building signage and lighting.

The Project would incorporate, where applicable, many of the implementation strategies presented in the Walkability Checklist and would implement a number of relevant design elements in order to foster a visually appealing pedestrian environment. The primary objectives defined for sidewalks address facilitating pedestrian movement and enriching the quality of the public realm by providing appropriate connections and street furnishings in the public right-of-way. Recommended implementation strategies that would be incorporated into the Project include creating a continuous and predominantly straight sidewalk and open space; creating a buffer between pedestrians and moving vehicles by the use of landscape and street furniture (i.e., street trees and landscaped planters along Violet Street) providing adequate sidewalk widths; and incorporating closely planted shade-producing street trees.

The Walkability Checklist strategies regarding crosswalks and street crossings do not apply to the Project because the Project does not include crosswalks or street crossings. In addition, the Walkability Checklist strategies regarding on-street parking do not apply to the Project because no internal roadways are located or proposed within the Project Site. Furthermore, as discussed above, sufficient off-street parking would be provided to meet applicable LAMC parking requirements.

The objective of the Walkability Checklist's utilities section is to minimize the disruption of views and visual pollution created by utility lines and equipment. The Project would screen rooftop equipment and locate trash enclosures and utility areas within the building, so as not to detract from the visual character of the Project Site. In addition, all major utilities would be installed underground or within the alley north of the Project Site. Utilities would also be located away from building entrances. As such, the Project would support the implementation strategies related to the undergrounding and screening of utilities.

Within the Walkability Checklist, building orientation addresses the relationship between buildings and the street as a means of improving neighborhood character and the pedestrian environment. In accordance with the recommended implementation strategies, the Project would designate grade level entrances from the public right-of-way for pedestrians. In addition, the primary building entrance would be visible from adjacent streets and accessible from the sidewalk. The Project's extensive window walls on the Project street frontages would create an inviting pedestrian experience to activate the street. Furthermore, the street frontage would also include landscaped planters, street trees, and appropriate lighting, thus creating a visually interesting, comfortable, and safe pedestrian environment.

In terms of off-street parking and driveways, the primary objective of the Walkability Checklist is to ensure pedestrian safety. Recommended implementation strategies that would be incorporated into the Project include maintaining the continuity of the sidewalk; accommodating vehicle access to and from the Project Site with as few driveways as possible; and illuminating all parking areas and pedestrian walkways. The Project would provide a residential parking entrance from the alley and an office parking entrance off of Violet Street. All vehicular parking would be located within the six subterranean parking levels.

The Walkability Checklist also calls for the use of on-site landscaping to contribute to the environment, add beauty, increase pedestrian comfort, add visual relief to the street, and extend the sense of the public right-of-way. As previously described, the Project would install street trees and landscaped planters along Violet Street. In addition, the Project would provide a ground-level landscaped pedestrian paseo system that would connect the existing commercial, office, and residential uses to the new buildings and provide pedestrian access to each of the Project's street frontages, as well as to the abutting alley. In so doing, the Project would achieve the following implementation strategies: providing planting that complements pedestrian movement or views and providing planting that complements the character of the built environment.

The Walkability Checklist objective related to building façades is to create/reinforce neighborhood identity and a richer pedestrian environment. The Project would address many of the relevant implementation strategies, including incorporating different textures, colors, materials, and distinctive architectural features that add visual interest; adding scale and interest to the building façade through articulated massing; reinforcing the existing façade rhythm along the street with architectural elements; discouraging blank walls; contributing to neighborhood safety by providing windows at the street that act as "eyes on the street;" and utilizing the building wall for security between the structure and the street, eliminating the need for fences at the street.

In addition, as intended in the Walkability Checklist, building signage and lighting would be designed to strengthen the pedestrian experience, neighborhood identity, and visual coherence. Project signage and lighting would be designed to achieve the following in support of the Walkability Checklist: including signage at a height and of a size that is visible to pedestrians, assists in identifying the structure and its use, and facilitates access to building entrances; providing adequate lighting levels to safely light pedestrian paths; utilizing adequate, uniform, and glare-free lighting to avoid uneven light distribution, harsh shadows, and light spillage; and using fixtures that are “dark sky” compliant.

Based on the Project elements described above and the analysis herein, the Project would support the applicable Walkability Checklist objectives and implement relevant strategies. As such, the Project would not conflict with the relevant aspects of the Walkability Checklist.

(d) Light and Glare

New sources of light that would be introduced by the Project would include low-level exterior lighting on the buildings and along pathways for security and wayfinding purposes; low-level lighting to accent signage, architectural features, and landscaping elements; outdoor decorative string lights; and interior lighting visible through the windows of the proposed uses. Exterior lighting along the public areas would include pedestrian-scale fixtures and elements. The Project would not include signs with flashing, mechanical, or strobe lights. The proposed lighting sources would be similar to other lighting sources in the vicinity of the Project Site. Project lighting would also comply with regulatory requirements, including the requirements that are set forth in the LAMC, the California Energy Code, and the CALGreen Code.

Project development could affect daytime glare conditions with the introduction of new buildings and signage at the Project Site. The Project would utilize glass, concrete, and metal on the building exteriors. However, exterior windows and glass used on building surfaces will be non-reflective or treated with an anti-reflective coating to minimize glare. Therefore, these materials would not have the potential to produce a substantial degree of glare. Nighttime glare could result from illuminated signage and from vehicle headlights entering and leaving the Project driveway (no headlights would be visible from the subterranean parking levels). However, Project illuminated signs would not exceed the prescribed lighting requirements of the LAMC, the Energy Code, and the CALGreen Code. In addition, while headlights from vehicles entering and leaving the driveway on Violet Street would be visible during the evening hours, such lighting sources would be typical for the Project area and would not be anticipated to result in a substantial adverse impact. Therefore, the Project would not create a new source of light or glare, which would adversely affect day or nighttime views in the area.

b. Agricultural and Forest Resources

The Project Site is located in an urbanized area of the City of Los Angeles and is developed with buildings, sheds, and surface parking. 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. Specifically, construction of the Project would involve the use of conventional building materials typical 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.

With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses. In addition, on-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and therefore would not result in substantially adverse odor impacts.

In addition, the construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403 regarding visible emissions violations.¹⁴ In particular, SCAQMD Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.¹⁵ Therefore, with compliance with existing regulatory requirements, the Project would not create odors that would adversely affect a substantial number of people.

¹⁴ SCAQMD, *Visible Emissions, Public Nuisance, and Fugitive Dust*, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed August 23, 2019.

¹⁵ SCAQMD, *Rule 402, Nuisance*, www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf?sfvrsn=4, accessed August 23, 2019.

Based on the above, the Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant and no mitigation measures are required.

d. Biological Resources

The Project Site is located in an urbanized area and is developed with buildings, sheds, and surface parking. Limited ornamental landscaping exists on-site. Due to the developed nature of the Project area, 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 (USFWS). 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. In addition, there are no established native resident or migratory wildlife corridors on the Project Site or in the vicinity. Accordingly, development of the Project would not impact any regional wildlife corridors or 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 the USFWS database of conservation plans and agreements does not show any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans applicable 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.

As discussed above, landscaping within the Project Site is limited. There are 16 ornamental trees and ornamental shrubs within portions of the Project Site.¹⁶ There are no street trees along the Project perimeter. Of the on-site tree species, only one tree, a *Platanus Racemosa* (Sycamore), is of a species that is protected by the LAMC.¹⁷ The removal of this protected tree is subject to City approval under Ordinance No. 177,404, which also requires that this tree be replaced on a 2:1 basis in accordance with the City's requirements set forth in Ordinance No. 177,404. The remaining on-site trees would be replaced on a 1:1 basis in accordance with the Department of City Planning's policy. The new tree species would be drought-tolerant and/or of a climate-adapted nature and would primarily require moist to dry soil conditions. Removal of street trees would comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting

¹⁶ Carter, Romanek Landscape Architects, Inc., 2143 Violet St. Los Angeles, Existing Tree Survey, April 16, 2018. See Appendix IS-1 of the Project's Initial Study.

¹⁷ Carter, Romanek Landscape Architects, Inc., 2143 Violet St. Los Angeles, Existing Tree Survey, April 16, 2018. See Appendix IS-1 of the Project's Initial Study.

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 LAMC requirements, new trees would be planted within the Project Site. 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 is located in an urbanized area and is currently developed with seven buildings, two sheds, and surface parking areas. As previously described, landscaping is limited, consisting of 16 trees and other ornamental landscaping within portions of the Project Site. The Project Site is located west of the Los Angeles River and is within the RIO District, Outer Core. Development of the Proposed Project would comply with the applicable development standards and guidelines for the RIO District, including landscaping guidelines, which would ensure that the Proposed Project does not conflict with a conservation plan. No other conservation plan, natural community conservation plan, or other approved habitat conservation plans apply to the Project Site.^{18,19} Thus, 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

The Project Site is not located within a currently established Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards or a City-designated Fault Rupture Study Area. In addition, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Therefore, as concluded in the Initial Study, since the potential for surface rupture due to faulting occurring beneath the Project Site is considered low, impacts would be less than significant.

In addition, the Project would be constructed in accordance with the most current Los Angeles Building Code regulations and the recommendations of the design level geotechnical investigation for the Project. As such, the Initial Study concluded that impacts related to strong seismic ground shaking would be less than significant.

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. The Geotechnical Investigation included as Appendix IS-2 of the Initial Study found that due to the depth of the historical highest groundwater level, the type of soils underlying the Project Site, and

¹⁸ *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 2141 Violet Street, <http://zimas.lacity.org/>, accessed June 6, 2019. The address 2143 Violet Street is not listed in ZIMAS. However, the Project Site includes 2117-2147 E. Violet Street and 2118-2142 E. 7th Place.*

¹⁹ *California Department of Fish and Wildlife, California Regional Conservation Plans, July 2017.*

the liquefaction mapping by the City and State, the Project Site would not be susceptible to liquefaction during an earthquake event. As such, 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 relatively flat topography. The Project Site is not located in a landslide area as mapped by the State or the City of Los Angeles. Further, the development of the Project does not propose substantial alteration to the existing topography. As such, the Initial Study concluded that impacts from landslides and lateral spreading would be less than significant.

Project construction 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. As discussed in the Initial Study, with compliance with regulatory requirements that include the implementation of Best Management Practices (BMPs), impacts related to soil erosion would be less than significant.

The Project Site is underlain by up to 5 feet of artificial fill, with Quaternary-age alluvial deposits below. The artificial fill is characterized as slightly moist with firm or medium density. It generally consists of yellowish brown sandy silt to silty sand with trace gravel. The fill is likely the result of past grading or construction activities at the site. The deeper Quaternary-age alluvial deposits consist of poorly graded sand, sand with silt, silty sand, clayey silt, and varying amounts of fine to coarse gravel. The Project Site is within the ancestral flood plain of the Los Angeles River and, although gravel and cobbles were only locally encountered in borings, zones of cobbles and boulders may be encountered during construction. Based on the depth of excavation, the Geotechnical Investigation concluded that the proposed structure would not be prone to the effects of expansive soils. If encountered, expansive soils would be removed during excavation. In addition, the Project would not increase the expansion potential of these soils. Therefore, the Initial Study concluded that impacts related to unstable and expansive soils would be less than significant.

The Project's wastewater demand would be accommodated via 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 for residential, office, and commercial uses. Specifically, operation of the proposed uses would be expected to involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and petroleum products. The proposed residential uses would involve the limited use of household cleaning solvents and pesticides for landscaping. 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 adequately reduced to a less than significant level through compliance with these standards and regulations.

The Phase I ESA, included as Appendix IS-3 of the Initial Study, included a review of environmental records for the Project Site and a site reconnaissance to identify potential on-site hazards. The Project Site was developed with structures for baled cotton storage and parking well before 1950. By 1960, warehouses were added along the western and southeastern corners of the site.

During the site reconnaissance visit, no evidence of hazardous substances, aboveground storage tanks (ASTs) or underground storage tanks (USTs), floor drains, drums, stains or corrosion, unidentified substance containers, wastewater discharge systems, stressed vegetation, unusual odors, or pits, ponds, or lagoons were identified on-site. One pole-mounted electrical transformer was observed in the northern area of the Project Site, but it was not labeled with respect to polychlorinated biphenyl (PCB) content and appeared to be in good condition with no stains or corrosion. Minor amounts of demolition debris were noted at the western area of the Project Site and household debris were noted at the eastern area, but no concerning conditions were noted. Soil piles were also noted in the vicinity of the structure at the western area of the Project Site, but no concerning conditions were noted. In the event an undocumented UST is identified on-site, it would be appropriately documented and removed according to Los Angeles Fire Department (LAFD) regulations.

Based on the age of the existing buildings on-site, there is a possibility that asbestos-containing materials (ACM) and lead-based paint (LBP) may be encountered during construction. In the event any suspect ACM or LBP is found, the Project would adhere to all federal, State, and local regulations prior to their removal. These regulations include, but are not limited to, the Toxic Substances Control Act (TSCA), the Resource Conservation and Recovery Act (RCRA), the federal and State Occupational Safety and Health Acts, SCAQMD Rule 1403 pertaining to asbestos emissions from renovation/

demolition activities, and the Residential Lead-Based Paint Reduction Act. Mandatory compliance with applicable federal and State standards and procedures would reduce risks associated with ACM and LBP to less than significant levels.

According to the Geotechnical Investigation, the Project Site is not located in a Methane Buffer Zone identified by the City. In addition, no recognized environmental concerns (RECs) or historic recognized environmental concerns (HRECs) were identified on the Project Site.

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 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.

Metropolitan High School is located approximately 0.25 mile to the west of the Project Site at 727 Wilson Street. Notwithstanding, 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 of residential and commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed residential and commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. 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. All potentially hazardous materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, including, but not limited to, federal and State Occupational Safety and Health Act requirements. As such, the use of such materials would not create a significant hazard to nearby schools, including the proposed on-site school, and impacts would be less than significant.

The Project Site was not listed on any of the standard regulatory databases searched when the Phase I ESA was conducted. The database search also included searches for State Voluntary Cleanup Sites, State Landfill and/or Solid Waste Disposal Sites, USTs, and hazardous materials. Several properties were identified within 0.12 mile of the Project Site that are listed on the State Registered Storage Tank (UST), Emergency Response Notification System (ERNS), RCRA Generators, and EnviroStor databases. However, none of these listings are considered to be environmental concerns for the Project Site. The Project would not exacerbate existing conditions associated with these listed items because the Project Site itself is not listed on any of the databases that were

reviewed in the Phase I ESA. Thus, impacts related to creating a hazard to the public or the environment would be less than significant.

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

According to the Safety Element of the City of Los Angeles General Plan, Alameda Street is a designated disaster route located approximately 0.5 mile east of the Project Site.²⁰ While it is expected that the majority of construction activities for the Project would be confined to the Project Site, 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 the Project's Construction Traffic Management plan prepared pursuant to Project Design Feature TR-PDF-1 that would be implemented to ensure adequate circulation and emergency access. The Project Site is also located at the termini of both 7th Place and Violet Street, which would further limit impacts of any lane closures to a few properties. In addition, while the Project would generate traffic in the vicinity and result in some modifications to site access, the Project would comply with LAFD access requirements and would not impede emergency access within the vicinity. Thus, as discussed in the Initial Study, impacts related to implementation of an adopted emergency response plan would be less than significant.

There are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone²¹ or within a City-designated fire buffer zone.²² Furthermore, the Project would be developed and rehabilitated in accordance with LAMC requirements pertaining to fire safety. Additionally, the proposed residential and commercial uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Impacts would be less than significant. 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

²⁰ *Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.*

²¹ *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 2141 Violet Street, <http://zimas.lacity.org/>, accessed April 8, 2020. The address 2143 Violet Street is not listed in ZIMAS. However, the Project Site includes 2117-2147 E. Violet Street and 2118-2142 E. 7th Place. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.*

²² *City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.*

fires. As such, the Initial Study concluded that impacts related to wildland fires would be less than significant.

g. Hydrology and Water Quality

During construction of the Project, particularly during the grading and excavation phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use, and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. Therefore, Project-related construction activities could potentially result in adverse effects on water quality. However, as Project construction would disturb more than 1 acre of soil, the Project would be required to obtain coverage under the NPDES Construction General Permit (Order No. 2009-0009-DWQ, as well as its subsequent amendments 2010-0014-DWQ and 2012-0006-DWQ) pursuant to NPDES requirements. In accordance with the requirements of the permit, a Stormwater Pollution Prevention Plan (SWPPP) would be developed and implemented during construction of the Project. The SWPPP would set forth BMPs, including erosion control, sediment control, non-stormwater management, and materials management measures, to minimize the discharge of pollutants in stormwater runoff. The SWPPP would be carried out in compliance with State Water Resources Control Board 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*.

In addition, project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC) to reduce the effects of sedimentation and erosion. Prior to the issuance of a grading permit, the Project Applicant would be required to provide the City with evidence that a Notice of Intent has been filed with the State Water Resources Control Board to comply with the Construction General Permit. Furthermore, with compliance with NPDES, which requires the preparation of a SWPPP, construction of the Project would not result in discharges that would cause regulatory standards to be violated in the Los Angeles River Watershed. With compliance with these existing regulatory requirements, impacts to water quality during construction would be less than significant, and no mitigation measures would be required.

Operation of the Project would introduce sources of potential stormwater pollution that are typical of residential, community, office, and retail uses (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with circulation areas). Stormwater runoff from precipitation events could potentially carry urban pollutants into municipal storm drains. However, the Project would implement BMPs for managing stormwater runoff in accordance with the current City of Los Angeles Low Impact

Development (LID) Ordinance requirements. The City's LID Ordinance sets the order of priority for selected BMPs. This order of priority is infiltration systems, stormwater capture and use, high efficiency biofiltration/bioretenion systems, and any combination of any of these measures. The Project would implement either a capture and use system, or biofiltration planters for managing stormwater runoff in accordance with current LID requirements. With compliance with these existing regulatory requirements, operation of the Project would not result in discharges that would cause regulatory standards to be violated. Impacts on water quality during operation would be less than significant.

The historically highest groundwater level in the area is greater than 150 feet bgs. Perched groundwater was encountered in borings at depths of 74.8 and 76 feet bgs. Anticipated excavation depths up to 77 feet bgs would occur to provide for the new subterranean parking levels. Considering the historic high groundwater level, the depth to perched groundwater encountered, and the depth of the excavation, temporary dewatering may be required during construction. Groundwater discharges from dewatering operations can contain high levels of fine sediments, which if not properly treated, exceed NPDES requirements. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all relevant NPDES requirements related to construction and discharges from dewatering operations. Thus, construction of the Project would result in less-than-significant impacts related to groundwater would not substantially deplete groundwater supplies in a manner that would result in a net deficit in aquifer volume or lowering of the local groundwater table.

With regard to groundwater recharge, the percolation of precipitation that falls on pervious surfaces is variable, depending on the soil type, condition of the soil, vegetative cover, and other factors. The Project Site is currently approximately 86 percent impervious. With implementation of the Project, impervious surfaces would comprise approximately 93 percent of the Project Site. As part of the Project, a stormwater system would be implemented wherein the stormwater would discharge to an approved discharge point in the public right-of-way and not result in infiltration of a large amount of rainfall that would affect groundwater hydrology, including the direction of groundwater flow. In addition, since the Project Site is predominately impervious under existing conditions and would continue to be so upon completion of the Project, the amount of rainfall infiltration that would occur on the Project Site would be nominal and would not contribute to groundwater recharge. Thus, the Project would not interfere substantially with groundwater recharge such that there would be a net deficit in the aquifer volume or lowering of the local groundwater table. As such, impacts on groundwater would be less than significant.

Construction activities associated with the Project, which would involve grading, have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. However, as discussed above, in accordance with NPDES

requirements the Project would implement a SWPPP that would specify BMPs and erosion/siltation 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 Project Site would be comprised of approximately 93 percent impervious areas. While there would be an incremental increase in the imperviousness of the Project Site, this increase would not significantly increase the amount of runoff from the Project Site. Specifically, the expected total increase in runoff within the Project Site would be 0.0236 cfs. Furthermore, while a projected increase of 0.25 cfs would be discharged onto 7th Place, a reduction of 0.23 cfs would be discharged onto Violet Street. As the increase in runoff in 7th Place represents an increase of less than 1 percent of the full-flow capacity of the downstream storm drain pipe, it is unlikely that this increase would cause flooding in 7th Place. In addition, given that the entire Project Site collects into the same storm drain network, most of this increase would be offset by the reduction in discharge onto Violet Street, which enters the network at the intersection of Violet Street and Santa Fe Avenue.

As part of LID compliance for the Project to manage post-construction stormwater runoff, the Project 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 serve to prevent on-site flooding and nuisance water on the Project Site.

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 impact would be less than significant.

The Project Site is not located within a 100-year flood plain as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles. The Safety Element of the City of Los Angeles General Plan does map the Project Site as being located within a potential inundation area.²³ The nearest levee is along the Los Angeles

²³ *Los Angeles General Plan Safety Element, November 1996, Exhibit G, Inundation & Tsunami Hazard Areas, p. 59.*

River located approximately 300 feet east of the Project Site. The U.S. Army Corps of Engineers (ACOE) operates and maintains the 22.5-mile stretch of the Los Angeles River between Lankershim Boulevard in Hollywood and Stuart and Grey Road in Downey, which includes the portion adjacent to the Project Site. Their maintenance activities include inspection and cleaning of the channel walls and removing vegetation growing in cracks and joints. In addition, the ACOE has directed repair of damaged embankments upstream to the Project Site and has installed barriers for those portions of the channel that were identified as at greatest risk of flood waters during the 2015–2016 El Nino storm season. With continued inspection, maintenance, and flood control activities, the potential for substantial adverse impacts related to inundation at the Project Site due to proximity to the Los Angeles River would be less than significant.

The Project Site is located approximately 14 miles east of the Pacific Ocean and the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami.²⁴ The Los Angeles River is located approximately 300 feet to the east but includes a sunken concrete lined channel, and there are no major water-retaining structures that are located immediately up-gradient from the Project Site. Thus, the potential for inundation as a result of seiche is considered low. As discussed above, the Project Site and surrounding area are fully developed and generally characterized by flat topography. Given the fact that the Project Site is not mapped by either the State or the City as being located in an area prone to landslides, the potential for the Project Site to be inundated by mudflows is low. Therefore, no seiche, tsunami, or mudflow events would be expected to impact the Project Site, and no related impacts would occur.

h. Land Use and Planning

The Project Site is located in a highly urbanized area characterized by a mixture of low- and mid-rise buildings occupied by a mix of uses. The Project would replace the existing surface parking lot with a new infill mixed-use project and would retain four existing buildings. All proposed development would occur within the boundaries of the Project Site as it currently exists and the Project does not propose a freeway or other large infrastructure that would divide a community. Impacts related to the physical division of an established community would be less than significant.

²⁴ *City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G, p. 59.*

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, or within a mineral producing area as classified by the California Geologic Survey. The Project Site is also not located 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 2 miles of an airport or within an area subject to an airport land use plan. The nearest airport is the Los Angeles International Airport located approximately 12 miles southwest of the Project Site. The Project Site is also not located within the vicinity of a private airstrip. The nearest private airstrip is the Los Alamitos Army Airfield, which is approximately 19.5 miles southeast of the Project Site. Therefore, 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

The Project's development of up to 347 live/work units would result in an increase of approximately 840 new residents.²⁵ The estimated 840 new residents generated by the Project would represent approximately 0.51 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2018 and 2024. The Project's new residential units would constitute up to approximately 0.44 percent of the housing growth forecasted in SCAG's 2016–2040 RTP/SCS between 2018 and 2024 for the Subregion. Therefore, the Project's residents and households would be well within SCAG's population and housing projections for the Subregion.

There are currently 10 existing live-work units on the Project Site. Six of these would be retained as part of the Project and four would be removed. Based on the City's household generation rate of 2.42 persons per household discussed above, the Project would therefore displace an estimated 10 people. However, with the development of 347 new live-work units, including 5 percent of the total units for Extremely Low Income households and 11 percent of the total units for Very Low Income households, the Project

²⁵ *Based on a rate of 2.42 persons per multi-family unit based on the 2017 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.*

would result in a net increase of housing in the City. As such, the Project would not displace substantial numbers of existing housing units or people that would require the construction or replacement of housing elsewhere. Impacts would be less than significant, and no mitigation measures are required.

Based on employee generation rates included in the 2018 LAUSD Developer Fee Justification Study, the Project's 187,374 square feet of new office space, 21,858 square feet of new retail/restaurant floor area, and 926 square feet of artist production space would generate approximately 961 net new employees.²⁶ As discussed above, the Project's 961 estimated new employees would represent approximately 0.95 percent of the employment growth forecasted (from 2018–2024) by the 2016–2040 RTP/SCS.²⁷ Therefore, the Project would not cause an exceedance of SCAG's employment projections contained in the 2016–2040 RTP/SCS.

Furthermore, as discussed previously, while construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so 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, project-related construction workers would not be expected to relocate their household's place of residence as a consequence of working on the Project and, therefore, the Project would not be considered growth-inducing from a short-term employment perspective.

In addition, as discussed previously, it is anticipated that some of the demand for the Project's 961 estimated employees during Project operations would be filled by then-existing vacancies in the housing market and others by any new residential developments that may occur in the vicinity of the Project Site. Therefore, given that the Project would not directly contribute to population growth in the Project area and as some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial.

²⁶ *The 2018 LAUSD Developer Fee Justification Study does not include an employee generation rate for artist production space. To provide a conservative estimate, the highest generation rate (i.e., Standard Commercial Office) was used.*

²⁷ *Based on a linear interpolation of 2012–2040 data.*

I. Transportation

The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. The Project does not include any proposed modifications to the street system or any dangerous design features. In addition, the Project would not result in incompatible uses as the proposed uses are consistent with the residential and commercial uses in the Project vicinity. Furthermore, the design and implementation of new driveways would comply with the City's applicable requirements, including emergency access requirements set forth by the LAFD. The Project design would also be reviewed by LADBS and the LAFD during the City's plan review process to ensure all applicable requirements are met. Therefore, no impacts would occur.

With respect to emergency access, while it is expected that the majority of construction activities for the Project would be confined to the Project Site, 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. The Project Site is also located at the termini of both 7th Place and Violet Street which would further limit impacts associated with emergency access. In addition, appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Further, 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 Project would not result in inadequate emergency access. Impacts would be less than significant.

m. Utilities and Service Systems

(1) Stormwater

The Project would implement capture and reuse or biofiltration to reduce stormwater pollution on the Project Site in accordance with the City's LID requirements. In addition, specific on-site 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.

(2) Telecommunications Facilities

The Project Site is located in an area served by existing telecommunications infrastructure. Installation of new telecommunications infrastructure would primarily take place on-site, with minor off-site work associated with connections to the existing system. 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. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers.

(3) Solid Waste

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 Senate Bill (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. Materials that could be recycled or salvaged include asphalt, glass, and concrete. 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. After accounting for mandatory recycling, the Project would result in approximately 595 tons of construction and demolition waste. Given the remaining permitted capacity the Azusa Land Reclamation facility, which is approximately 57.72 million tons, as well as the remaining 163.39 million tons of capacity at the Class III landfills serving the County, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.²⁸

As shown in Table VI-1 on page VI-36, upon full buildout, the Project would generate approximately 1,389 tons of solid waste per year when accounting for the removal of the existing land uses. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as AB 939 which requires California cities, counties, and approved regional solid

²⁸ *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2018 Annual Report, December 2019.*

**Table VI-1
Estimated Project Solid Waste Generation**

Building	Size	Employee Generation Rate per sf^a	Estimated No. of Employees	Solid Waste Generation Rate^b	Total Generation (tons/year)^c
Existing					
Retail ^d	20,684 sf	0.00271	56	0.91 tons/emp/yr	51
Restaurant ^e	5,055 sf	0.00271	14	2.98 tons/emp/yr	42
Office	6,983 sf	0.00479	33	0.37 tons/emp/yr	12
Live-Work	10 du	N/A	N/A	2.23/du/yr	22
Warehouse	2,109 sf	0.00135	3	2.72 tons/emp/yr	8
Total Existing					135
Proposed^f					
Live-Work	353 du	N/A	N/A	2.23/du/yr	787
Office	194,357 sf	0.00479	931	0.37 tons/emp/yr	344
Retail/Restaurant ^g	47,597 sf	0.00271	129	2.98 tons/emp/yr ^h	384
Warehouse	2,109 sf	0.00135	3	2.72 tons/emp/yr	8
Community Room	926 sf	0.00479	4	0.37 tons/emp/yr	1
Total Proposed					1,524
Total Net Increase (Proposed minus Existing)ⁱ					1,389
<p><i>du = dwelling unit</i> <i>emp = employee</i> <i>lb = pound</i> <i>sf = square feet</i></p> <p>^a Employee Generation Rates from Los Angeles Unified School District Developer Fee Justification Study, March 2018, Table 14.</p> <p>^b Non-residential yearly solid waste generation factors are from City of Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study, Table 4, July 2002. Residential rates are from L.A. CEQA Thresholds Guide.</p> <p>^c Numbers have been rounded.</p> <p>^d Size of retail derived by subtracting 5,055 sf of recently converted restaurant space from the 25,739 sf of total existing retail/restaurant space shown on Table A-1 in the Project Description of the Initial Study included as Appendix A of this Draft EIR.</p> <p>^e Conversion of retail and warehouse space, as approved by Los Angeles Department of Building and Safety Permit No. 16016-10000-14951 and Planning Case No. ZA-2017-1185-CUB, to allow for future restaurant use by an operator.</p> <p>^f Includes existing uses to be retained plus new construction.</p> <p>^g Includes the conversion of approximately 5,055 square feet of existing retail and warehouses uses to restaurant uses has been approved by the City (Los Angeles Department of Building and Safety Permit No. 16016-10000-14951 and Planning Case No. ZA-2017-1185-CUB), which allows for future restaurant use by an operator.</p> <p>^h Applies the higher generation rate for restaurant use in order to provide a conservative analysis.</p> <p>ⁱ The solid waste generated by the existing uses is subtracted from the solid waste generated by the proposed and the existing to remain, which results the net increase of solid waste that would be generated on the Project Site after completion.</p> <p>Source: Eyestone Environmental, 2020.</p>					

waste management agencies responsible for enacting plans and implementing programs to divert 50 percent of their solid waste away from landfills and compliance with AB 341, which requires California commercial enterprises and public entities that generate four or more cubic yards per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste LA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.²⁹ The estimated annual net increase in solid waste requires California commercial enterprises and public entities that generate 4 cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Solid waste that would be generated by the Project represents approximately 0.001 percent of the remaining capacity for the County's Class III landfills open to the City of Los Angeles.³⁰ The Project's estimated solid waste generation would therefore represent a nominal percentage of the remaining daily disposal capacity of the County's Class III landfills.

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 development projects include an on-site recycling area or room of specified size.³¹ The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, 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, impacts would be less than significant.

n. Wildfire

As discussed above, in Section 6.e, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone³² or fire buffer zone.³³ In addition, the

²⁹ *The Zero Waste LA Franchise System would divide the City into 11 zones and designate a single trash hauler for each zone. Source: LA Sanitation, Final Program Environmental Impact Report for City Ordinance: City-Wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling (SCH# 2013021052), March 2014.*

³⁰ *1,389 tons per year/149.77 million tons = 0.001 percent*

³¹ *Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.*

³² *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 2141 Violet Street, <http://zimas.lacity.org/>, accessed April 8, 2020. The address 2143 Violet Street is not listed in ZIMAS. However, the Project Site includes 2117-2147 E. Violet Street and 2118-2142 E. 7th Place. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.*

Project Site is not located near State responsibility lands. Therefore, no impacts related to the following would occur: (1) the impairment of an adopted emergency response plan or emergency evaluation plan related to wildfire; (2) the exposure of Project occupants to pollutant concentrations from a wildfire; (3) the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or (4) the exposure of people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes.

³³ *City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.*