VI. Other CEQA Considerations

VI. Other CEQA Considerations

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 and unavoidable impacts related to on-site noise and vibration (human annoyance threshold) during construction. Cumulative impacts with respect to on- and off-site construction noise would also be significant and unavoidable. All other impacts associated with the Project would be less than significant or reduced to less than significant with mitigation.

a. On-Site Construction Noise

As discussed in Section IV.F, Noise, of this Draft EIR and shown in Table IV.F-11, the estimated construction noise levels would exceed the significance thresholds by 18.5 dBA at receptor R1, 10.3 dBA at receptor R2, 6.7 dBA at receptor R3, and 4.6 dBA at receptor R5. Mitigation measure NOI-MM-1 would be implemented to reduce on-site construction noise impacts by a minimum of 15 dBA at receptor R1, 11 dBA at receptor R2, 7 dBA at receptor R3, and 5 dBA at receptor R5. The estimated construction-related noise levels at all off-site sensitive receptor locations would be reduced to below a level of significance with implementation of Mitigation Measure NOI-MM-1, with the exception of receptor location R1. With the implementation of the Mitigation Measure NOI MM-1, the construction-related noise at receptor location R1 would still exceed the significance threshold by 3.3 dBA.

In the event Project construction occurs concurrently with construction activities for Related Project Nos. 21, 42, 61, 63, 64, and 99 within 1,000 feet of the Project Site,

cumulative construction noise impacts would potentially exceed the 5-dBA significance threshold at receptor locations R3, R4, and R5. Therefore, construction noise impacts resulting from the Project would be cumulatively considerable and would be considered significant. Construction-related noise levels from the related projects would be intermittent and temporary, and it is anticipated that, as with the Project, the related projects would comply with the construction hours and other relevant provisions set forth in the Los Angeles Municipal Code (LAMC). Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual related project and compliance with locally adopted and enforced noise ordinances. Nevertheless, if nearby related projects were to be constructed concurrently with the Project, significant cumulative construction noise impacts could occur.

b. Off-Site Construction Noise

As discussed in Section IV.E, Noise, of this Draft EIR, although Project-level noise impacts from off-site construction[1] would be less than significant, cumulative noise due to construction truck traffic from the Project and other related projects would likely exceed the ambient noise levels along the haul route by 5 dBA. As such, cumulative noise impacts from off-site construction would be significant and unavoidable.

c. On-Site Construction Vibration

As discussed in Section IV.E, Noise, of this Draft EIR, after implementation of Mitigation Measure NOI-MM-2, Project-level vibration impacts from on-site construction activities would still exceed the 72 VdB significance criteria at the residential use east of the Project Site (receptor location R1). Other mitigation measures considered to reduce vibration impacts from on-site construction activities with respect to human annoyance included the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be very deep and long to be effective and are not considered cost effective for temporary applications, such as construction.[2] In addition, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate ground-borne vibration from the excavation equipment. Thus, it is concluded that there are no feasible mitigation measures that could be

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[1] *Off-site noise includes other noise sources such as materials delivery, concrete mixing, and haul trucks (construction trucks), as well as construction worker vehicles accessing the Project Site during construction.*

[2] *Caltrans, Transportation- and Construction-Induced Vibration Guidance Manual, June 2004.*

implemented to reduce the temporary vibration impacts from on-site construction associated with human annoyance to a less-than-significant level.

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) states that where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

As discussed above, the Project would result in significant and unavoidable impacts related to Project-level on-site noise and vibration (human annoyance threshold) during construction and cumulative on- and off-site construction noise impacts. The Project's significant noise and vibration impacts would occur during construction for limited durations from the operation of demolition equipment, construction equipment and haul trucks. Such impacts would be temporary and would cease upon completion of certain construction activities, specifically demolition, grading, and building construction. Nevertheless, as evaluated in Section V, Alternatives, of this Draft EIR, alternatives to the Project were considered to eliminate the Project's significant noise and vibration impacts. As discussed therein, significant construction noise and vibration impacts would be expected to occur with any development scenario because construction activities and the need to demolish the existing buildings on the Project Site are inherently disturbing. Thus, reducing temporary construction noise and vibration impacts to below a level of significance at adjacent uses is technologically infeasible. Furthermore, any reduction in the intensity of construction activities on an hourly or daily basis would increase the duration of the construction period and prolong construction noise. Additionally, among the alternatives considered, no feasible alternative was identified that would eliminate the Project's significant and unavoidable noise and vibration impacts with the exception of the No Project/No Build Alternative. Although the No Project/No Build Alternative would avoid the Project's significant and unavoidable impacts, the No Project/No Build Alternative would not meet the underlying purpose of the Project or any of the Project objectives, and is not considered a feasible alternative. As discussed in Section V, Alternatives, of this Draft EIR, the Project, as proposed, satisfies the Project objectives to a substantially greater degree than any of the proposed alternatives. This Draft EIR also includes mitigation measures that reduce the potential impacts associated with the Project to the extent feasible.

As discussed in Section II, Project Description, of this Draft EIR, the Project is a mixed-use development that provides new multi-family housing opportunities and neighborhood-serving retail and restaurant uses that serve the community and promote walkability. In addition, the Project would provide 735 new residential units consisting of

251 studio units, 336 1-bedroom units, and 148 2-bedroom units to help support the City's housing needs, and those of the Hollywood community in particular.

The Project Site is located in an area that is characterized by a high degree of pedestrian activity and is well-served by public transit. The Project's location facilitates access to public transit and encourages alternative modes of transportation. In addition, the Project would provide short- and long-term bicycle parking to promote biking as an alternative mode of transportation. Furthermore, the proposed ground-level market, retail, and restaurant uses are intended to promote pedestrian activity and further activate the streets in the surrounding area. At the ground level, development would be organized around a publicly accessible outdoor pedestrian paseo that would run north-south through the center of the Project Site. The pedestrian paseo would connect to a public plaza located along Sunset Boulevard. The pedestrian paseo and public plaza are intended to promote the goals identified in the City's Mobility Plan and Vermont/Western Station Neighborhood Area Specific Plan. These beneficial features would support the City's policies to reduce vehicle miles traveled (VMT) and mobile source greenhouse gas (GHG) emissions.

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

3. Significant Irreversible Environmental Changes

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. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."

The Project would necessarily consume a limited amount of slowly renewable and non-renewable resources that could result in irreversible environmental changes. This consumption would occur during construction of the Project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that would include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation. As demonstrated below, the Project would

consume a limited commitment of natural resources and would not result in significant irreversible environmental changes.

a. Building Materials and Solid Waste

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

The Project's impacts regarding solid waste are discussed in the Initial Study for the Project, which is included in Appendix A of this Draft EIR. As discussed therein, pursuant to Senate Bill (SB) 1374, during construction of the Project, 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. Thus, the consumption of non-renewable building materials such as lumber, aggregate materials, and plastics would be reduced. In addition, during operation, the Project would provide 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. The Project would also comply with Assembly Bill (AB) 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source sorted receptacles to facilitate recycling.

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. In addition, water use during construction would be offset by the reduction of water demand currently consumed by the existing uses, which would be removed as part of the Project. During operation, the estimated water demand for the Project would not exceed the available supplies projected by the Los Angeles Department of Water and Power (LADWP), which has approved the Water Supply Assessment for the Project. Thus, LADWP would be able to meet the water demand of the Project, as well as the existing and planned future water demands of its service area. In addition, pursuant to Project Design Feature WAT-PDF-1, the Project would implement a variety of water conservation features to reduce indoor and outdoor water use. Furthermore, the Project would be required to reduce indoor water use by at least 20 percent in accordance with the City of Los Angeles Green Building Code. Thus, as evaluated in Section IV.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 162,744 gallons of gasoline and approximately 447,607 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.003 percent of the 2017 annual on-road gasoline-related energy consumption and 0.04 percent of the 2017 annual diesel fuel-related energy consumption in Los Angeles County. With respect to electricity, Project construction is expected to consume 40,835 kWh of electricity. The estimated construction electricity usage represents approximately 1.3 percent of the estimated annual operational demand for the Project which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP. Moreover, construction electricity usage would replace the existing electricity usage at the Project Site during construction. Therefore, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Therefore, impacts related to the consumption of fossil fuels during construction of the Project would be less than significant.

During operation, the Project's increase in electricity and natural gas demand would be within the anticipated service capabilities of LADWP and the Southern California Gas Company, respectively. As discussed in Section IV.C, Energy, of this Draft EIR, the Project would comply with 2019 Title 24 standards and applicable 2019 CALGreen requirements. In addition, the Project would use Energy Star–labeled products and light-emitting diode (LED) lighting where appropriate, to reduce electricity use. Therefore, 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

As discussed in the Project's Initial Study included as Appendix A of this Draft EIR, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used for residential and commercial developments. Specifically, operation of the Project would be expected to involve the use and storage of 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 irretrievable commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources and the Project Site for future generations or for other uses. However, the consumption of such resources would not be considered substantial and would be consistent with regional and local growth forecasts and development goals for the area. The loss of such resources would not be highly accelerated when compared to existing conditions and such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result from the Project, such changes are concluded to be less than significant, and the limited use of nonrenewable resources that would be required by Project construction and operation is justified.

4. Growth-Inducing Impacts

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 735 multi-family residential units. According to the Department of City Planning, the most recent estimated household size for multi-family housing units in the City of Los Angeles area is 2.41 persons per unit.[3] Applying this factor, development of 735 multi-family residential units would result in a net increase of approximately 1,771 residents. According to the Southern California Association of Governments (SCAG) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), the forecasted population for the City of Los Angeles in 2017 was approximately 3,981,911 persons.[4] In 2026, the projected occupancy year of the Project, the City of Los Angeles is anticipated to have a population of approximately 4,227,450 persons.[5] Thus, the 1,771 estimated net new residents generated by the Project would represent approximately 0.14 percent of the population growth fin the SCAG region between 2017 and 2026, and approximately 0.72 percent of the projected population growth in the City during the same time period. Based on SCAG's 2020–2045 RTP/SCS, the population of 1,771 persons generated by the Project would represent approximately 0.14 percent of the projected growth in the SCAG region between 2017 and 2026 (i.e., the Project's baseline and buildout years), and 0.68 percent of the projected growth in the City of Los Angeles during the same period. Therefore, the Project's residents would be well within SCAG's population projections in both the 2016-2040 and 2020-2045 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.

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[3] *Based on a rate of 2.41 persons per multi-family unit based on 2018 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.*

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

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

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 vicinity of the Project Site 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.

With regard to employment during operation of the Project, the Project's 95,000 square feet of neighborhood serving commercial uses would generate approximately 375 employees, based on employee generation rates published by LADOT.[6] When existing uses are removed, this results in a net increase of 35 on-site employees. According to the 2016-2040 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2017 was approximately 1,780,811 employees.[7] In 2026, the projected occupancy year of the Project, the Subregion is anticipated to have approximately 1,932,750 employees.[8] Based on SCAG's 2020–2045 RTP/SCS projections, there would be approximately 8,753,067 employees in the SCAG Region and 1,947,472 employees in the City of Los Angeles in 2026. The net increase would represent 0.02% of the employment growth projected in the City of Los Angeles by both the 2016-2040 and 2020-2045 RTP/SCS. Therefore, the Project would not cause an exceedance of SCAG's employment projections contained in the 2016-2040 and 2020-2045 RTP/SCS. In addition, the proposed neighborhood-serving commercial uses would include a range of full-time and part-time positions that are typically filled by persons already residing in the vicinity of the workplace, and who generally do not relocate their households due to such employment opportunities. Therefore, given 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 market, retail, and restaurant uses would be unlikely to create an indirect demand for additional housing or households in the area.

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[6] *Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020, Table 1.*

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

[8] *Based on a linear interpolation of 2012–2040 data.*

c. Utility Infrastructure Improvements

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

d. Conclusion

Overall, the Project would be consistent with SCAG's 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 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. Air Quality

Mitigation Measures AIR-MM-1 through AIR-MM-6 pertain to air quality impacts during construction. Specifically, AIR-MM-1 requires all off-road diesel-powered equipment greater than 50 hp to meet USEPA Tier 4 Final emission standards and AIR-MM-2 requires all haul trucks used during the grading phase to be model year 2007 or newer. AIR-MM-3

requires all construction equipment to be properly tuned and maintained in accordance with the manufacturer's specifications. The contractor is required to keep documentation on-site demonstrating compliance. AIR-MM-4 requires contractors to maintain and operate construction equipment so as to minimize exhaust emissions and to turn off vehicles in loading and unloading queues after five minutes. AIR-MM-5 requires that petroleum-powered construction activity use electricity from power poles rather than diesel- or gasoline-powered generators. If diesel- or gasoline-powered generators must be used, they are to be located at least 100 feet from sensitive land uses whenever possible. AIR-MM-6 requires the use of solar-powered generators to the extent they are commercially available and feasible if generators are required during construction. These mitigation measures would reduce air quality impacts during construction by requiring newer and properly tuned construction equipment which results in lower emissions and would not otherwise affect the physical environment. As such, implementation of these mitigation measures would not result in adverse secondary impacts.

b. Cultural Resources

Mitigation Measure CUL-MM-1 requires preparation of a cultural resources monitoring and treatment plan (CRMTP) for buried prehistoric and historic-period archaeological deposits that may exist within the Project Site. Mitigation Measures CUL-MM-2 and CUL-MM-3 require implementation of the CRMTP to reduce potential Project effects on unanticipated archaeological resources unearthed during construction. These mitigation measures represent procedural actions that would not affect the physical environment and would be beneficial in protecting cultural resources that could potentially be encountered on-site. As such, implementation of these mitigation measures would not result in adverse secondary impacts.

c. Geology and Soils

Mitigation Measure GEO-MM-1[9] requires the retention of an independent Construction Monitor who shall be responsible for coordinating with a certified paleontologist in the event paleontological materials are uncovered during construction. The Construction Monitor is also required to prepare and submit documentation of the Applicant's compliance. If paleontological materials are encountered, the paleontologist shall then assess the discovered material(s) and prepare a survey, study, or report containing recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource. This mitigation measure represents procedural actions that

[9] *At the time the Initial Study was published, the Appendix G thresholds addressed paleontological resources under the Cultural Resources section and the paleontological mitigation measure was numbered "CUL-MM-1." Paleontological resources are now evaluated as part of Geology and Soils and the mitigation measure has been renamed accordingly.*

would not affect the physical environment and would be beneficial in protecting paleontological resources that could potentially be encountered on-site. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

d. Noise

Mitigation Measure NOI-MM-1 requires the use of temporary and impermeable sound barrier along the Project's eastern, northern, and southern property lines between the Project construction area and affected receptors to reduce construction-related noise levels. The temporary sound barrier shall be designed to provide a 15-dBA noise reduction at ground level of the noise-sensitive receptor R1 (i.e., the residential uses on the east side of Serrano Avenue; an 11-dBA noise reduction at ground level of noise sensitive receptor R2 (i.e., the residential use on Serrano Avenue north of the Project Site); a 7-dBA noise reduction at ground level of noise sensitive receptor R3 (i.e., the hotel on the north side of Sunset Boulevard); and a 5-dBA noise reduction at ground level of noise sensitive receptor R5 (i.e., the residential use on Fernwood Avenue south of the Project Site). The proposed temporary sound barriers would also serve to minimize views of the construction area from adjacent uses. 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. In addition, upon completion of construction, the temporary sound barrier would be removed. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

Mitigation Measure NOI-MM-2 requires the Applicant to retain the services of a structural engineer to develop and implement a vibration monitoring program capable of documenting the construction-related ground vibration levels at the property line of the multi-story office building immediately south of the Project Site during demolition and grading/excavation phases. In the event the warning level is triggered, the contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level, including but not limited to halting/staggering concurrent activities and utilizing lower vibratory techniques which could include smaller equipment, micropiles, or saw cut instead of breaking. In the event the regulatory level of 0.50 inch/second (PPV) is triggered, the contractor shall halt the construction activities in the vicinity and visually inspect the affected building for any damage. Results of the inspection must be logged. The contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level. Construction activities may then restart. This mitigation measure would be beneficial in addressing the Project's potential construction vibration impacts on the multi-story office building to the south. In addition, this mitigation measure would not result in physical changes to the environment. As such, implementation of this mitigation measure 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 aesthetics; air quality—odors; agricultural and forestry resources; biological resources; geology and soils; hazards and hazardous materials; hydrology and water quality; land use—division of an established community; mineral resources; noise—airport noise and private airstrip noise; transportation—air traffic and hazardous design features; stormwater drainage facilities; and solid waste.[10] A summary of the analysis provided in Appendix A for these issue areas is provided below.

a. Aesthetics

The Project is a mixed-use residential and commercial development which is entirely within 0.5 mile of a major transit stop (i.e., the Hollywood and Western Metro Station 0.25 mile north of the Project Site), and meets PRC Section 21099's definition of an infill site as a lot located within an urban area that has been previously developed. Therefore, pursuant to SB 743 and ZI 2452, the Project's aesthetic impacts shall not be considered a significant impact on the environment as a matter of law.[11] Notwithstanding the mandate imposed by SB 743, the Initial Study included a discussion of aesthetics for informational purposes only.

As discussed in the Initial Study, due to surrounding development the Project would not block any scenic vistas. The Project is not located along a state scenic highway and contains no protected trees or rock outcroppings. There are no historic buildings on or adjacent to the Project Site. With respect to visual character and quality, the Project would become part of the urban fabric and the Project massing, height, and aesthetic character would be consistent with many of the existing and proposed commercial and residential structures in the vicinity of the Project Site. Lighting and glare associated with Project

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[10] *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.*

[11] *ZI 2452 states that "A project shall be considered to be within a TPA if all parcels within the project have no more than 25 percent of their area farther than 0.5 mile from the major transit stop and if not more than 10 percent of the residential units or 100 units, whichever is less, in the project are farther than 0.5 mile from the major transit stop."*

operation would not result in a new source of substantial light or glare which would adversely affect day or nighttime views in the area. In accordance with SB 743 and ZI 2452, impacts would not be considered significant.

b. Agricultural and Forest Resources

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

c. Air Quality

No objectionable odors are anticipated as a result of either construction or operation of the Project. Construction of the Project would use conventional building materials typical 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 or result in a nuisance as defined by SCAQMD Rule 402. The Project would not include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, fiberglass molding, or other land uses associated with odor complaints. On-site trash receptacles which have the potential to create odors, would be contained, located, and maintained in a manner that promotes odor control such that no substantially adverse odor impacts would be anticipated. Thus, the Initial Study concluded that odor impacts would be less than significant.

d. Biological Resources

The Project Site is located in an urbanized area and is developed with low-rise commercial uses and their associated parking areas. 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 (CDFW) 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 significantly 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. There are no Habitat Conservation Plans, Natural Community Conservation Plans, or other approved habitat conservation plans applicable to the Project Site.

There are no protected trees on the Project Site. The existing 51 on-site trees and 14 street trees that would be removed during construction. Although unlikely, these trees could potentially provide nesting sites for migratory birds. Removal of these trees would comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. Compliance with the MBTA would ensure that impacts would be less than significant. In addition, new trees would be planted within the Project Site in accordance with LAMC requirements.

All on-site trees would be replaced at a 1:1 ratio and off-site trees would be replaced at a 2:1 ratio, or as required by the City's Urban Forestry Division, subject to the approval of the Board of Public Works. 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. Therefore, the Initial Study concluded that impacts to biological resources would be less than significant.

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

e. Cultural Resources

The existing buildings on the Project Site were constructed between 1971 and 1986. Given their age (less than 50 years old), their undistinguished design (i.e., franchise architecture, common design…), and their lack of association with an architect or master builder or any important event in history or activity, the existing on-site buildings are not considered historical resources. The nearest historic resource is the Hollywood Bungalow Court located approximately 0.1 mile from the Project Site. This resource is not adjacent to the Project Site. Project construction would be confined to the boundaries of the Project Site and would not require removal of that resource or provide for improvements which would otherwise affect the integrity of the building. Additionally, the resource is separated from the Project Site by Sunset Boulevard and commercial development fronting Sunset Boulevard. Due to the distance between the Project Site and the nearest historic resource, as well as intervening development, impacts to historic resources would be less than significant, and no mitigation measures are required.

With respect to human remains, there is the possibility that unknown resources could be encountered during construction of the Project, particularly during ground-disturbing activities such as excavation and grading. While the uncovering of human remains is not anticipated, if human remains are discovered during construction, such resources would be treated in accordance with State law, including CEQA Guidelines Section 15064.5(e), PRC Section 5097.98, and California Health and Safety Code Section 7050.5. Specifically, if human remains are encountered, work on the portion of the Project Site where remains have been uncovered would be suspended and the City of Los Angeles Public Works Department and the County Coroner would be immediately notified. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission would be notified within 24 hours, and the guidelines of the Native American Heritage Commission would be adhered to in the treatment and disposition of the remains. Compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities. Therefore, the Initial Study concluded that the Project's impact on human remains would be less than significant and no mitigation measures would be required.

f. Geology and Soils

The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone or a City-designated Fault Rupture Study Area. The closest active fault to the Project Site is the Elysian Park blind thrust fault, located approximately 0.8 mile northeast of the Project Site. However, the risk for surface rupture associated with blind thrust faults is inferred to be low. The closest fault likely to cause surface rupture is the Hollywood Fault, located approximately 4.5 miles northwest of the Project Site. Furthermore, given that no active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site, the Project would not exacerbate existing fault rupture conditions. Therefore, the Project would not expose people or structures to substantial adverse effects associated with fault rupture and would not cause or exacerbate seismic conditions on the Project Site, and impacts would be less than significant.

The Project would increase the amount of development on-site, thereby increasing the number of persons on-site. However, as with any new development, building design and construction for the Project would be required to conform to the current seismic design provisions of the California Building Code and Los Angeles Building Code, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards. Furthermore, the Project would not exacerbate existing environmental conditions with regard to seismic ground shaking. Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California

region and would minimize the potential to expose people or structures to substantial risk, loss, or injury. Thus, with compliance with regulatory requirements, impacts associated with seismic ground shaking would be less than significant.

The City's General Plan maps identify the Project Site as being prone to liquefaction. However, as discussed in the Geotechnical Investigation included as Appendix IS-4 of the Initial Study, samples from borings taken on-site were evaluated for liquefaction potential. As discussed in further detail in the Geotechnical Investigation, testing results show the soils on the Project Site have a plasticity index higher than those considered to be liquefiable. Therefore, based on the testing results, the potential for liquefaction at the Project Site is considered remote. Thus, the Project would not expose people or structures to substantial adverse effects associated with liquefaction, and the Project would not exacerbate existing conditions with regard to liquefaction. As such, potential impacts associated with liquefaction would be less than significant.

The Project Site and surrounding area are fully developed and characterized by relatively flat topography with minimally sloping terrain. The Project Site is not located in a landslide area as mapped by the State nor is the Project Site mapped as a landslide area by the City of Los Angeles. Further, the development of the Project does not propose substantial alteration to the existing topography. As such, the Initial Study concluded that no impacts from landslides would occur.

Project construction activities including grading, excavation, and other construction activities that 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, soil erosion impacts would be less than significant.

As noted above, the Project Site is not prone to landslides and based on the depth to groundwater and soil conditions, subsidence and liquefaction are unlikely at the Project Site. Impacts would be less than significant.

As discussed in the Geotechnical Investigation, upper site soils were found to be expansive while the deeper soils which would support the proposed foundations were found to be in the low expansion range. Since the upper layer would be removed as part of the Project, the Geotechnical Investigation concluded reinforcement beyond that required by the Department of Building and Safety would not be required. Thus, the Project would not exacerbate existing environmental conditions with regard to expansive soil. Impacts associated with 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.

g. Hazards and Hazardous Materials

The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction 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. However, all potentially hazardous materials to be used during construction and operation of the Project would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations. Additionally, the use of such materials would not create a significant hazard to nearby schools, including Grant Elementary School located approximately 0.25 mile northwest of the Project Site. Therefore, with proper handling and storage, the impact with regard to the release of hazardous materials, including within 0.25 mile of a school, would be less than significant.

With regard to the existing uses on the Project Site, potential environmental concerns at the Project Site noted in the Phase I Environmental Site Assessment (ESA) included as Appendix IS-5 of the Initial Study, include asbestos-containing materials (ACM), polychlorinated biphenyls (PCBs), and lead based paint (LBP). All suspect materials were observed to be in good condition with a low potential for damage except select areas of fireproofing and wall material. Mold was also identified within the existing buildings. With compliance with relevant regulations and requirements, Project construction activities, including demolition, would not expose people to a substantial risk resulting from the release of these materials in the environment. Impacts associated with ACM, PCBs, LBP, and mold would be less than significant.

No evidence for the presence of on-site underground storage tanks (USTs), such as fuel dispensers, fill ports, aboveground vents or piping was observed on the Project Site and according to the State Water Resources Control Board, USTs are not present on the Project Site. In the unlikely event any previously unknown USTs are uncovered during construction, these tanks would be removed in accordance with all applicable federal, state, and local regulations. Impacts would be less than significant.

The existing grocery store on the Project Site is listed on the HAZNET database in 2011 for reportedly disposing 0.003 ton of off-specification, aged, or surplus inorganic waste, 0.019 ton of unspecified solvent mixture via storage, bulking, and/or transfer off-site. Other waste was reported to have been disposed of off-site in 2012, 2013, and 2014 using the same disposal methods. No violations were reported at the Project Site. The grocery store would be removed as part of the Project and would no longer generate wastes. Furthermore, 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. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations.

The Project Site is not located within two 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, the Project Site is not located along a designated disaster route. The nearest disaster routes are the Hollywood Freeway, located approximately 0.2 mile southwest of the Project Site, and Santa Monica Boulevard, located approximately 0.4 mile miles south of the Project Site. While it is expected that the majority of construction activities for the Project would be confined to the Project Site, 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, both directions of travel would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Additionally, the Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan. As such, the Initial Study concluded that 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. In addition, the City's Zoning Information and Map Access System indicates that the Project Site is not located in a Very High Fire Hazard Severity Zone. Furthermore, the Project would be developed 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. Therefore, the Project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. As such, the Initial Study concluded that no impacts related to wildland fires would occur.

h. 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 one acre of soil, the Project would be required to obtain coverage under the National Pollutant Discharge Elimination System (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 Best Management Practices (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 (LAMC Chapter IX, Division 70) 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. With compliance with these existing regulatory requirements, impacts to water quality during construction would be less than significant.

Operation of the Project would introduce sources of potential stormwater pollution that are typical of residential, market, retail, and restaurant 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, which is infiltration systems, stormwater capture and use, high efficiency biofiltration/bioretention systems, and any combination of any of these measures. Based on depth to groundwater beneath the site, infiltration could potentially occur under

the building.[12] If infiltration is not feasible, stormwater capture and reuse would be required. If neither of these methods is feasible, a high efficiency biofiltration/bioretention system would be implemented. Through one or a combination of these methods, the Project would meet City requirements with respect to stormwater management. With compliance with these existing regulatory requirements, impacts on water quality during operation would be less than significant.

Based on the Geotechnical Investigation included as part of the Initial Study, groundwater was encountered at a depth of approximately 52.5 feet below ambient site grade. In addition, based on a review of the California Geological Survey Seismic Hazard Evaluation Report 026 Plate 1.2 entitled "Historically Highest Ground Water Contours," the historic high groundwater level within the Project Site is on the order of 42 feet below ground. The Project would include excavation to depths of up to 25 feet below ground surface for the proposed subterranean parking garage. Therefore, no groundwater would be expected to be encountered during construction of the Project which could require withdrawal of groundwater. Similarly, the Project would not require a permanent withdrawal of groundwater during operation of the Project. Therefore, the Project would not substantially deplete groundwater supplies.

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. As discussed in the Updated Water Resources Report included as Appendix U of this Draft EIR, approximately 95 percent of the Project Site currently consists of impervious surface area. Therefore, the degree to which surface water infiltration and groundwater recharge occurs on-site is negligible. With implementation of the Project, the amount of impervious surfaces would continue to be approximately 95 percent of the Project Site. As such, operation of the Project would not alter the existing limited groundwater recharge that occurs within the Project Site. Furthermore, as discussed above, in accordance with the City's LID Ordinance, the Project would include BMPs to treat stormwater. Therefore, the Project would not substantially interfere with groundwater recharge.

Construction activities associated with the Project, which would involve removal of the existing structures and grading, have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. However, as discussed above, the Project includes the implementation of a SWPPP that would specify BMPs and erosion control measures to be used during construction to manage runoff flows

[12] *At the time the Initial Study was published in June 2017, it was assumed that infiltration was infeasible at the Project Site. However, further investigation reveals infiltration may be feasible within a 17.5-foot zone under the building. Please refer to the updated Water Resources Report included as Appendix U of this Draft EIR.*

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.

With implementation of the Project, drainage from the Project Site would be conveyed similar to, or better than, the existing condition, which conveys stormwater in southwest and southeast directions. In addition, as the amount of impervious surfaces on the Project Site would be no greater than 95 percent, the Project would not increase the percentage of impervious surface area on the Project Site. Therefore, stormwater flows from the Project Site would not increase with implementation of the Project and, as such, the Project would not affect the capacity of the existing stormwater infrastructure during a 50-year storm event, as required by the City.

The Project Site is not located within a 100-year flood plain as mapped by the Federal Emergency Management Agency or by the City of Los Angeles. Thus, the Project would not place housing within a 100-year flood plain or place structures that would impede or redirect flood flows within a 100-year flood plain. In addition, the Project Site is not located within a flood control basin or dam inundation area. Therefore, no impacts associated with flooding would occur.

The Project Site is approximately 12.5 miles northeast of the Pacific Ocean. In addition, the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami. Additionally, there are no standing bodies of water near the Project Site that may experience a seiche. The Project Site is also not positioned downslope from an area of potential mudflow. Therefore, no seiche, tsunami, or mudflow events would be expected to impact the Project Site. No impacts would occur.

i. Land Use and Planning

The Project Site is located in an urbanized area characterized primarily by low- to mid-rise buildings that are occupied primarily by commercial and residential uses. Specific uses surrounding the Project Site include a small retail center, the Upright Citizens Brigade Theatre, an inn, and a five-story multi-family residential building with retail to the north, along Sunset Boulevard; retail, single-, and multi-family residential uses to the east, along Serrano Avenue; the former site of Deluxe Laboratories, a motion picture film processing laboratory which is now a commercial office building, to the south; and a recently constructed Target store to the west, along Western Avenue. In the vicinity of the Project Site, the major arterials such as Sunset Boulevard are generally developed with dense residential and commercial development, while lower density mixed-use and residential areas are located along the adjacent collector streets, including Serrano Avenue. Against

this background, the Project would not divide an established community. Specifically, there is no existing residential use on the Project Site or a residential area that would be physically separated or otherwise disrupted by the Project as development of the Project would occur within the boundaries of the existing Project Site. Moreover, the proposed uses would be compatible with the variety of existing land uses and low- to mid-rise buildings in the surrounding area. Impacts would be less than significant.

j. 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. Therefore, the Initial Study concluded that no impacts related to mineral resources would occur.

k. Noise

The Project Site is not located within two miles of an airport or within an area subject to an airport land use plan. The Project Site is also not located within the vicinity of a private airstrip. Therefore, the Project would not expose people working in the project area to excessive noise levels from airports and no impacts would occur.

l. Population and Housing

No housing currently exists on the Project Site, and as such, the Project would not displace any people or housing. No impact would occur.

m. 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 other mixed-use development including residential, commercial, and entertainment uses in the Project vicinity. Therefore, no impacts would occur.

n. Utilities and Service Systems

(1) Stormwater

The Project would not increase the percentage of impervious surface area on the Project Site. Therefore, stormwater flows from the Project Site would not increase with implementation of the Project. In addition, the Project would provide appropriate on-site drainage improvements to control runoff. Thus, 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 would require construction of new on-site telecommunications infrastructure to serve new buildings and potential upgrades and/or relocation of existing telecommunications infrastructure. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. However, the Project would prepare a Construction Traffic Management Plan pursuant to Project Design Feature TR-PDF-2, which would ensure safe pedestrian access, as well as emergency vehicle access and safe vehicle travel in general, to reduce any temporary pedestrian and traffic impacts occurring as a result of construction activities. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration (i.e., months) and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would primarily take place on-site, with minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing energy and telecommunications lines would be coordinated with service providers.

(3) Solid Waste

The Project Site is currently developed with a grocery store, vacant commercial space, fast food, and their associated parking areas, all of which would be removed as part of the Project. Pursuant to the requirements of SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. 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 serving Los Angeles County. Given the remaining permitted capacity at 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 Los

Angeles County, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

The Project would generate a net increase of approximately 9,096 net pounds of solid waste more per day. Projected out annually, this would result in approximately 1,660 tons per year of solid waste. However, it is noted that the estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures, such as compliance with AB 341, which requires California commercial enterprises and public entities that generate 4 or more cubic yards per week of waste, and multi-family housing with five or more units, to adopt recycling practices, or implementation of the City's upcoming 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. The estimated annual net increase in solid waste that would be generated by the Project represents approximately 0.04 percent of the 4,151,768 tons of solid waste disposed of by the City of Los Angeles in 2018 (the most recent year for which data is available) and approximately 0.002 percent of the remaining capacity at the Class III landfills serving the County. As discussed below, in accordance with the City's Space Allocation Ordinance (Ordinance No. 171,687), the Project would also provide a designated recycling area for Project residents to facilitate recycling, which would further reduce the Project's waste stream.

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 a recycling area or room of specified size on the Project Site.[13] 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.

o. Wildfire

As discussed above in Section 6.g, there are no wildlands located in the vicinity of the Project Site. In addition, ZIMAS indicates that the Project Site is not located in a Very High Fire Hazard Severity Zone. As with all projects, the Project would be developed 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 cause or exacerbate wildfires. Therefore, the Project would not result in impacts related to wildfires.

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