

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 respect to on-site construction noise (Project-level and cumulative); on-site construction vibration pursuant to the threshold for human annoyance (Project-level only); off-site construction vibration pursuant to the threshold for human annoyance (Project-level and cumulative); and off-site operational noise (Project-level and cumulative—Office Option). 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.H, Noise, of this Draft EIR and shown in Table IV.H-11, the estimated construction noise levels would exceed the significance thresholds by up to 23.2 dBA at receptor R1, up to 37.3 dBA at receptor R2, and up to 19.0 dBA at receptor R3. Mitigation measure NOI-MM-1 would be implemented to reduce on-site construction noise impacts by a minimum of 15 dBA at receptor locations R1, R2, and R3. However, the estimated construction-related noise levels would still exceed the significance thresholds at the sensitive uses represented by receptor locations R1, R2, and R3.

In the event Project construction occurs concurrently with construction activities for Related Project No. 59 within 1,000 feet of the Project Site, cumulative construction noise impacts could potentially exceed the 5-dBA significance threshold by up to 3.1 dBA. Specifically, concurrent construction with Related Project No. 59 could exceed the

significance threshold at receptor locations R3. 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 extent feasible through proposed mitigation measures for each individual related project and compliance with locally adopted and enforced noise ordinances.

Nevertheless, if Related Project No. 59 were to be constructed concurrently with the Project, significant cumulative construction noise impacts could occur

b. On-Site Construction Vibration

As discussed in Section IV.H, Noise, of this Draft EIR, Project-level vibration impacts from on-site construction activities would exceed the 72 VdB human annoyance significance criteria at the residential uses north, south, and east of the Project Site. 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 it is cost prohibited for temporary applications, such as construction, which is considered infeasible. 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. As such, there are no feasible mitigation measures to reduce the potential vibration human annoyance impacts

c. Off-Site Construction Vibration

As discussed in Section IV.H, Noise, of this Draft EIR, Project vibration levels from construction trucks would exceed the significance criteria for human annoyance at sensitive receptors (e.g., residential and hotel uses) along Vine Street and Sunset Boulevard. It would not be feasible to install a wave barrier, as described above, along the public roadways for the off-site construction vibration impacts. There are no other feasible mitigation measures that would reduce the potential vibration human annoyance impacts associated with the off-site construction trucks. Cumulative impacts would also be significant and unavoidable.

d. Operational Noise (Office Option)

As discussed in Section IV.H, Noise, of this Draft EIR, under the Office Option, the Project would result in a 5.2 dBA increase along the roadway segment of Afton Place (between Vine Street and El Centro Avenue) under Driveway Scenario 3, which would exceed the 5 dBA significance threshold. There are no feasible mitigation measures to reduce the significant noise impacts associated with the off-site traffic. Cumulative impacts would also 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) 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. 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 and are further described below.

As discussed above, the Project would result in significant and unavoidable impacts related to Project-level on-site noise and on- and off-site vibration (human annoyance threshold) during construction and cumulative on-site construction noise and cumulative off-site vibration impacts. The Project's significant noise and vibration impacts would occur during construction for limited durations from the operation of demolition equipment and construction equipment. 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 all of 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. The 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 includes two options referred to as the Residential Option and the Office Option. The Residential Option would develop up to 429 new residential units, including 36 units designated for Very Low Income households, an approximately 55,000-square-foot grocery store, approximately 5,000 square feet of neighborhood-serving commercial retail uses, and 8,988 square feet of uses in the bungalows. The bungalows would be rehabilitated and adapted for reuse as either restaurants or 12 residential units, in which case the development would still propose a total of 429 residential units. The Office Option would develop approximately 463,521 square feet of office uses and 11,914 square feet of restaurant uses, as well as 8,988 square feet of uses in the bungalows. The bungalows would be rehabilitated and adapted for reuse as either restaurants or nine residential units. The new building would be 303 feet in height when accounting for rooftop mechanical equipment.

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, including the Metro B Line (Red) subway, making it well suited for a mixed-use development. 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 retail, supermarket, and/or restaurant uses are intended to promote pedestrian activity and further activate the streets in the surrounding area. Specifically, under both options, the new building would activate Vine Street, De Longpre Avenue, and Afton Place, as the proposed ground-level neighborhood-serving commercial retail and restaurant uses would promote pedestrian activity and further activate the streets in the surrounding area. These beneficial features would support the City's policies to reduce vehicle miles traveled (VMT) and mobile source greenhouse gas (GHG) emissions.

Additionally, as discussed in Section IV.G, Land Use, of the Draft EIR, the Project would be consistent with the Hollywood Community Plan, Hollywood Redevelopment Plan, General Plan Framework Element, and the 2020-2045 RTP/SCS. Specifically, the Project would protect the environment and health of the region's residents by improving air quality, and encouraging active transportation (e.g., bicycling and walking). The Project would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby mass transit options, including a number of rail and bus lines. The availability and accessibility of public transit in the

vicinity of the Project Site is documented by the Project Site's location within a designated SCAG HQTAs and TPA, as defined by PRC Section 21099. In addition, the Project would provide bicycle parking spaces and would enhance pedestrian activity in the area by providing landscaped sidewalks and human-scale commercial/retail/restaurant frontages on the ground floor. The Residential Option would feature a paseo with access from De Longpre Avenue and Afton Place. The Project would also be designed to meet the standards of LEED Silver® or equivalent green building standards and would feature vehicle parking spaces equipped with EV charging stations as well as additional facilities capable of supporting future EVSE. As such, the Project would support the reduction in greenhouse gas emissions, encourage the use of alternative modes of transportation (i.e., walking, biking, and public transit), and reduce dependency on single-occupancy vehicles. As such, with design based on smart growth principles, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and opportunities for walking and biking.

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.L.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. Thus, as evaluated in Section IV.L.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 114,417 gallons of gasoline and approximately 165,396 gallons of diesel fuel throughout construction of the Residential Option or an estimated 89,328 gallons of gasoline and approximately 202,099 gallons of diesel fuel throughout construction of the Office Option. For comparison purposes, the fuel usage during Project construction under both the Residential and Office Option would represent approximately 0.002 percent of the 2021 annual on-road gasoline-related energy consumption and 0.02 percent of the 2021 annual diesel fuel-related energy consumption in Los Angeles County. With respect to electricity, a total of approximately 35,265 kWh of electricity is anticipated to be consumed during Project construction under the Residential Option and 26,444 kWh of electricity under the Office Option. The estimated construction electricity usage represents approximately 0.66 percent of the estimated net annual operational demand under the Residential Option and 0.28 percent under the Office Option which 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. To present the most conservative analysis, the highest operational demand for both the Residential and Office Options are discussed below.

As discussed in Section IV.C, buildout of the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 5,141,611 kWh per year under the Residential Option with restaurant bungalows and 9,616,111 kWh under the Office Option with restaurant bungalows. As such, the Project-related net increase in annual electricity consumption under the Residential Option and the Office Option would represent approximately 0.02 percent and 0.04 percent of LADWP's projected sales in

2025 respectively.¹ With respect to natural gas, buildout of the Project is projected to generate a net increase in the on-site demand for natural gas totaling approximately 6,367,572 cf under the Residential Option with restaurant bungalows and 8,391,482 cf under the Office Option with restaurant bungalows. The Project would account for 0.0007 percent of the SoCalGas planning area under the Residential Option with restaurant bungalows and 0.009 percent of the SoCalGas planning area, respectively. Regarding transportation energy, under the Residential Option with restaurant bungalows, the Project's estimated petroleum-based fuel usage would be approximately 451,287 gallons of petroleum-based fuels annually and under the Office Option with restaurant bungalows, the Project's estimated petroleum-based fuel usage would be approximately 326,835 gallons of petroleum-based fuels annually. For comparison purposes, the transportation-related fuel usage for the Project's Residential Option with restaurant bungalows would represent approximately 0.007 percent of the 2025 (buildout year) annual on-road gasoline- and diesel-related energy consumption in Los Angeles County and the Office Option with restaurant bungalows would represent 0.005 percent.

As also discussed in Section IV.C, Energy, of this Draft EIR, the Project would comply with 2019 Title 24 standards, applicable 2019 CALGreen requirements, the City of Los Angeles Green Building Code, City of Los Angeles Green New Deal and the 2020–2045 RTP/SCS. Such requirements of the Title 24, CALGreen Code, and Green Building Code include specific lighting requirements to conserve energy, window glazing to reflect heat, enhanced insulation to reduce heating and ventilation energy usage, and enhanced air filtration. The Project would implement these measures as required by the applicable code. The 2019 Title 24 Standards ensure that builders use the most energy efficient and energy conserving technologies and construction practices. In addition, the Project would implement measures to comply with Title 24 energy efficiency requirements, including Project Design Features GHG-PDF-1 and WAT-PDF-1, as included in Section IV.E, Greenhouse Gas Emissions, and Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, respectively.

In addition, the Project would use Energy Star-labeled products and light-emitting diode (LED) lighting where appropriate, to reduce electricity use. Lastly, the Project is located in an HQTAs and includes a number of features that would reduce the number of VMT such as increase density, a mixed-use development, and increased destination and transit accessibility. 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

¹ *While the Project is anticipated to be complete by 2027, for purposes of providing a more conservative analysis, Project operation is assumed to be in 2025.*

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, paints, 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. Additionally, any soil contamination, asbestos containing materials, or lead based paint encountered during demolition and construction would be handled and disposed of 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. Growth can be induced or fostered as follows:

- Direct growth associated with a project;
- Indirect growth created by either the demand not satisfied by a project or the creation of surplus infrastructure not utilized by a project.
- To provide the most conservative scenario, the following analysis considers the Project's Residential Option for population growth and the Office Option for employment growth.

a. Population

As discussed in Section II, Project Description, of this Draft EIR, the Project's Residential Option would include up to 429 units. Based on generation rates provided by the City of Los Angeles VMT Calculator Documentation, development of 429 multi-family residential units would result in a net increase of approximately 966 residents.² According to the Southern California Association of Governments (SCAG) 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS), the population of the City of Los Angeles in 2017 was approximately 3,962,679 persons. In 2027, the projected occupancy year of the Project, the City of Los Angeles is anticipated to have a population of approximately 4,251,472 persons. Thus, the 966 estimated net new residents generated by the Project would represent approximately 0.35 percent of the population growth the City between 2017 and 2027. Therefore, the Project's residents would be well within SCAG's population projections in 2020–2045 RTP/SCS for the City and would not result in a significant direct growth-inducing impact.

² *Based on City of Los Angeles VMT Calculator Documentation (Version 1.3), May 2020, Table 1: Land Use and Trip Generation Base Assumptions. The residential generation rate of approximately 2.25 residents per dwelling unit for "Multi-Family Residential" land use is applied to the 429 dwelling units. As documented in Appendix D, VMT Analysis LADOT Calculator Worksheets, of the Project's Transportation Assessment (Appendix R of this Draft EIR), the Residential Option would generate approximately 966 residents.*

b. Employment

As discussed in Section II, Project Description, the Project's Office Option would include 463,521 square feet of office uses and up to 20,902 square feet of restaurant uses.

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, the Project's Office Option would result in a net increase of 1,818 employees, based on employee generation rates published by LADOT.³ According to the 2020–2045 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2017 was approximately 1,858,217 employees. In 2027, the projected occupancy year of the Project, the Subregion is anticipated to have approximately 1,957,390 employees. The net increase would represent 1.83 percent of the employment growth projected in the City of Los Angeles by the 2020–2045 RTP/SCS. Therefore, the Project would not cause an exceedance of SCAG's employment projections contained in the 2020–2045 RTP/SCS. In addition, the proposed commercial uses would include a range of full-time and part-time positions that are typically filled by persons already residing in the vicinity of the workplace, and who generally do not relocate their households due to such employment opportunities. Therefore, given 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 commercial uses would be unlikely to create an indirect demand for additional housing or households in the area.

³ *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.*

c. Utility Infrastructure Improvements

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

d. Conclusion

Overall, the Project would be consistent with 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. 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 barriers 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 Afton Place south of the Project Site); a 15-dBA noise reduction at ground level of noise sensitive receptor R2 (i.e., the residential use east of the Project Site); and a 15-dBA noise reduction at ground level of noise sensitive receptor R3 (i.e., the residential use and the Southern California Hospital on De Longpre Avenue northeast 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 cease when construction is complete. 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 inspect and document the apparent physical condition of the readily-visible features of the two existing historic single-family residential buildings east of the Project Site. This measure also requires the Applicant to retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a vibration monitoring program capable of documenting the construction-related ground vibration levels at the buildings during demolition and grading/excavation phases. The system shall also be programmed for two preset velocity levels: a warning level of 0.1 inch/second (PPV) and a regulatory level of 0.12 PPV. The system shall also provide real-time alert when the vibration levels exceed the warning level. In the event the warning level of 0.1 PPV 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. In the event the regulatory level of 0.12 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.

b. Transportation

Mitigation Measure TR-MM-1 requires the addition of a protected/permitted left-turn phase with reoptimized signal timing for westbound Sunset Boulevard at Van Ness Avenue. The improvements at the referenced intersection consist of lane restriping and changes to signal timing only and 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; agricultural and forestry resources; air quality—odors; biological resources; hazards and hazardous materials; land use and planning (habitat conservation plan or natural community conservation plan)⁴; mineral resources; noise—airport noise and private airstrip noise; population and housing; transportation—air traffic and hazardous design features; stormwater drainage facilities; and solid waste.^{5,6,7} Although the Initial Study did not include an Office Option, the conclusions in the Initial Study are still applicable given that 1) both options would be developed on the same Project Site and 2) both options would include a similar amount of development. Any issue where the conclusions may differ based on the option pursued are analyzed below. A summary of the analysis provided in Appendix A for these issue areas is provided below. For purposes of this discussion, “Project” includes both options unless otherwise stated.

a. Aesthetics

The Residential Option is a mixed-use residential and commercial development and the Office Option is an employment center project on a Project Site which is entirely within 0.5 mile of a major transit stop (i.e., the Hollywood/Vine Metro Station 0.4 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

⁴ *At the time the NOP was issued, the Appendix G checklist included a threshold related to habitat conservation plans and natural community conservation plans. This threshold was deleted as part of the December 2018 updates to Appendix G and these issues are now addressed solely under Biological Resources.*

⁵ *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.*

⁶ *Impacts related to Geology and Soils and Hydrology and Water Quality were determined to be less than significant in the Initial Study. However, due to subsequent changes to the Project, these issues are now evaluated in Sections IV.D and IV.F, respectively, of this Draft EIR.*

⁷ *The Initial Study determined Land Use and Planning impacts related to habitat conservation plans or natural community conservation plans to be less than significant. However, this threshold was deleted as part of the December 2018 updates to Appendix G and these issues are now addressed solely under Biological Resources.*

and ZI 2452, the Project's aesthetic impacts shall not be considered a significant impact on the environment as a matter of law.⁸ 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, and the historic buildings would be relocated within the Project Site and adapted for reuse pursuant to a Preservation Plan. 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 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 and residential uses. 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. Under the Hollywood Community Plan, the Project Site is designated for Regional Center Commercial land uses for the eight western parcels nearest to Vine Street and Medium Residential for the remainder of the site. The Project Site consists of several lots of various zones and height designations including: C4-2D-SN, (T)(Q)C2-2D, R4-2D, and R3-1XL. 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

⁸ 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."

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 commercial and residential uses. Landscaping is limited, consisting of ornamental landscaping including seven on-site trees within portions of the Project Site. Due to the improved nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. There are no riparian or other sensitive natural communities, or federally protected wetlands as defined by Section 404 of the Clean Water Act on the Project Site or in the surrounding area. 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. Six on-site trees and one street tree 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.

The on-site trees would be replaced with 146 trees of various species. The street tree would be replaced on a minimum 2:1 basis with a minimum of 24-inch box trees or as determined by the Department of Public Works. The new tree species would be drought-tolerant and/or of a climate-adapted nature and would primarily require moist to dry soil conditions. 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. Hazards and Hazardous Materials

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

Based on the Phase I ESA, historic data indicates that the Project Site has been developed with various residential and commercial uses since at least the 1920s. Such uses consisted of dry-cleaning operations between 1933 and the 1950s and a gasoline service station in the 1920s and 1930s. Based on these historic uses, a Phase II ESA was completed to determine if a vapor encroachment condition exists on the Project Site. The Phase II ESA did not identify detectable concentrations of volatile organic compounds in any of the five samples taken. Similarly, the Phase II ESA did not identify any release of chlorinated organic solvents associated with dry cleaning operations (e.g., tetrachloroethylene and trichloroethylene). Based on these results, no significant risk to human health or the environment was identified, and the Phase II ESA did not recommend any further action regarding this issue.

In addition, the current uses of the Project Site and adjoining properties are not ones that are indicative of the use, treatment, storage, disposal, or generation of significant quantities of hazardous substances or petroleum products. However, based on the age of the buildings on-site, there is the potential for asbestos-containing materials (ACM), lead based paint (LBP), and polychlorinated biphenyls (PCBs) to be present.

The Phase I ESA did not include an ACM survey or an LBP survey. However, as noted above, given the age of the buildings to be removed, there is the potential for ACMs and/or LBP to be present on-site. Thus, prior to demolition activities related to the Project, the Applicant will conduct surveys of all buildings to verify the presence or absence of any ACMs (in accordance with SCAQMD Rule 1403, Asbestos Emissions from Demolition/Renovation Activities) and LBP and conduct remediation or abatement before any disturbance occurs. Any ACMs and LBP would be removed by a licensed abatement contractor in accordance with all federal, State and local regulations prior to renovation or

demolition. Mandatory compliance with applicable federal and State standards and procedures would reduce risks associated with ACMs and LBP to less-than-significant levels.

As identified in the Phase I ESA, one pole mounted electrical transformer is located on the Project Site. This transformer is owned by LADWP and was not labeled with respect to potential PCB content. Fluorescent light ballasts present on the Project Site also have the potential to contain PCBs. In the event that PCBs are found, suspect materials would be removed in accordance with all applicable federal, State and local regulations prior to demolition activities. Specifically, the disposal of PCB wastes is regulated by the Electronic Code of Federal Regulations (CFR), Title 40, Part 761 (40 CFR 761) to ensure the safe handling of these materials. With compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of PCBs in the environment. Therefore, impacts related to PCBs would be less than significant.

As described in the Phase I ESA, no evidence or record of underground storage tanks or aboveground storage tanks was found. The Project Site is not within a Methane Zone or Methane Buffer Zone identified by the City. Therefore, there is a negligible risk of subsurface methane release. No other recognized environmental concerns (RECs) or historic recognized environmental concerns (HRECs) were identified on the Project Site.

Based on the above, and 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 accidental conditions involving the release of hazardous materials into the environment. Therefore, as concluded in the Initial Study, impacts related to the release of hazardous materials into the environment would be less than significant.

The Los Angeles Film School is located within 0.25 mile of the Project Site. The Le Conte Middle School is located approximately 0.4 mile east of the Project Site. As discussed above, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction and operation of residential and commercial developments. Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used in the vicinity of the Project Site. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste, and all materials during both construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable federal, state, and local regulations. As such, the Initial Study concluded that the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of a school, and impacts would be less than significant.

The Project Site is not listed in any of the standard federal, state, or local databases searched as part of the Phase I ESA. Various listings within 0.25 mile include small and large quantity generators of hazardous materials (e.g., photo labs, cleaners, etc.), underground storage tanks, and leaking underground storage tank sites. However, none of these listings are considered to be environmental concerns for the Project Site. Furthermore, as discussed above, all potentially hazardous material used during both construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable federal, state, and local regulations. Therefore, the Initial Study concluded that the Project would not create a significant hazard to the public or the environment associated with identification of the Project Site on a hazardous materials list, and the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard. Impacts would be less than significant.

The Project Site is not located within the vicinity of an airport, a private airstrip, or an airport planning area and would not result in a safety hazard for people residing or working in the area. Therefore, the Initial Study concluded that the Project would not result in a safety hazard for people residing or working in the Project area, and no impact would occur.

The Project Site is not located along a designated disaster route. The closest disaster routes include the Hollywood Freeway, approximately 0.6 mile east of the Project Site, and Santa Monica Boulevard, approximately 0.4 mile south of the Project Site. While it is expected that the majority of construction activities for the Project would be confined to the Project Site, temporary and limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially affect emergency access adjacent to the Project Site. However, access to the Project Site and surrounding area during construction of the Project would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. During operation, access to the Project Site would continue to be provided from Vine Street, De Longpre Avenue, and/or Afton Place, depending on the driveway configuration. In addition, the Project would not install barriers that would impede emergency response within and in the vicinity of the Project Site. The Project would also be expected to provide adequate emergency access and comply with Los Angeles Fire Department (LAFD) access requirements during operation. Therefore, the Initial Study concluded that the Project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan, and impacts would be less than significant.

There are no wildlands located in the vicinity of the Project Site. In addition, the Project Site is not located within a Very High Fire Hazard Severity Zone or a City-designated fire buffer zone. However, the Project Site would be developed with new

structures that would comply with LAMC and LAFD requirements pertaining to fire safety. Therefore, the Project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. As such, the Initial Study concluded that impacts related to wildland fires would be less than significant.

f. 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.

g. 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.

h. Population and Housing

As discussed in Section II, Project Description, of this Draft EIR, the Project includes two options. The Project's Residential Option would develop up to 429 new residential units, including 36 units designated for Very Low-Income households, an approximately 55,000-square-foot grocery store, approximately 5,000 square feet of neighborhood-serving commercial retail uses, and 8,988 square feet of uses in the bungalows. The Project's Office Option would develop approximately 463,521 square feet of office uses and 11,914 square feet of restaurant uses, as well as 8,988 square feet of restaurant uses or nine residential units in the bungalows. To present the most conservative analysis, the Residential Option is used for an analysis of population growth and the Office Option is used for employment growth.

As noted above, the Residential Option would develop up to 429 residential units which would increase the residential population within the Project vicinity. Based on generation rates provided by the City of Los Angeles VMT Calculator Documentation, the Project would generate approximately 966 residents.⁹ According to SCAG's 2016–2040

⁹ *Based on City of Los Angeles VMT Calculator Documentation (Version 1.3), May 2020, Table 1: Land Use and Trip Generation Base Assumptions. The residential generation rate of approximately 2.25 (Footnote continued on next page)*

RTP/SCS, the population for the City of Los Angeles Subregion in 2017 was approximately 3,962,679 persons. In 2027, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,251,472 persons. Thus, the estimated 966 residents generated by the Project would represent approximately 0.35 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2017 and 2027. Therefore, the Project's maximum residential population would be well within SCAG's population projection for the City of Los Angeles Subregion.

As noted above, the Project's Office Option would include 463,521 square feet of office uses and up to 20,902 square feet of restaurant uses. This scenario would generate approximately 1,938 employees, resulting in a net increase of 1,818 employees.¹⁰ According to the 2020–2045 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2017 is approximately 1,858,217 employees. In 2027, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,957,390 employees. Thus, the Project's maximum net increase of 1,818 employees would constitute approximately 1.83 percent of the employment growth forecasted between 2017 and 2027. Therefore, the maximum number of employees generated by the Project would not exceed SCAG's employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities.

As analyzed above, the new population and employees that would be generated by the Project would be within SCAG's population and employment projections for the City of Los Angeles Subregion. Therefore, the Project would not induce substantial population or housing growth. Impacts related to population and housing would be less than significant.

As described in the Initial Study, the Project Site currently includes an eight-unit multi-family residential building that would be removed as part of the Project; however, this building is now vacant. Additionally, while six residential bungalows are located on the Project Site, three of these are occupied by commercial uses and the other three are vacant. Therefore, the Project would not displace any people. Additionally, with the development of up to 429 housing units, the Project would result in a net increase of housing in the City. Thus, impacts related to the displacement of people or housing would be less than significant.

residents per dwelling unit for "Multi-Family Residential" land use is applied to the 429 dwelling units. As documented in Appendix D, VMT Analysis LADOT Calculator Worksheets, of the Project's Transportation Assessment (Appendix R of this Draft EIR), the Residential Option would generate approximately 966 residents.

i. Transportation

The Project Site is not located within the vicinity of any private or public airport or planning boundary of any airport land use plan. Since the publication of the Initial Study, the height of the Residential Option's new building, which is taller than the Office Option, has been updated to 360 feet and 4 inches when accounting for mechanical equipment, and the Project no longer proposes a helipad. The Project would be required to comply with applicable Federal Aviation Administration (FAA) requirements regarding rooftop lighting for high-rise structures. Furthermore, the Project would be required to comply with the notice requirements imposed by the FAA for all new buildings taller than 200 feet and would complete Form 7460-1 (Notice of Proposed Construction or Alteration), which must be submitted to the FAA at least 45 days before the start date of the proposed construction or alteration or the date an application for a construction permit is filed, whichever is earliest. Adherence to all regulatory requirements and review and approval by all applicable agencies would ensure design and construction of the new building would not pose a threat to the public. Therefore, impacts related to changes in air traffic patterns would be less than significant.

The Project's design does not include hazardous geometric design features. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. In addition, the development of the Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. Furthermore, the design and implementation of new driveways would comply with the City's applicable requirements, including emergency access requirements set 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. Moreover, the proposed uses would be consistent with the surrounding uses. Therefore, the Initial Study concluded that no impacts related to hazards from a design feature would occur.

j. Utilities and Service Systems

(1) Stormwater

The Project would decrease the percentage of impervious surface area on the Project Site from 96 percent to 79 percent. As determined in the Water Resources Technical Report included as Appendix J of this Draft EIR, capture and reuse BMPs (cisterns) would be implemented to control stormwater runoff such that no increase in

¹⁰ *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.*

runoff would result from the Project. In addition, the LID requirements for the Project Site would outline the stormwater treatment post-construction BMPs required to control pollutants associated with either the first 0.75 inch of stormwater runoff from a storm event or the 85th percentile, 24-hour storm event, whichever is greater, per the City's Stormwater Program. 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-1, which would ensure safe pedestrian access, as well as emergency vehicle access and safe vehicle travel in general, to reduce any temporary pedestrian and traffic impacts occurring as a result of construction activities. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration (i.e., months) and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would primarily take place on-site, with minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing energy and telecommunications lines would be coordinated with service providers.

(3) Solid Waste

The Project Site is currently developed with commercial and vacant single- and multi-family uses 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 58.84 million tons, as well as the remaining 148.40 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.¹¹

The Project's Office Option would generate the most solid waste, resulting in a net increase of approximately 19,354 pounds per day.¹² Projected out annually, this would result in approximately 3,532 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. Solid waste that would be generated by the Project represents approximately 0.002 percent of the remaining capacity for the County's Class III landfills open to the City of Los Angeles.¹³ 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 a recycling area or room of specified size on the Project Site.¹⁴ 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 in accordance with AB 939, and providing for the recycling of organic waste in accordance with AB 1826. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant.

k. Wildfire

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

¹¹ *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.*

¹² *The Project's Residential Option would result in a net increase of 6,616 pounds of solid waste per day.*

¹³ *3,532 tons per year/148.40 million tons) x 100 = 0.002 percent*

¹⁴ *Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.*

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.