

## **VI. Other CEQA Considerations**

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## 1. Significant Unavoidable Impacts

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

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

As evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, and summarized below, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with regard to Project and cumulative construction noise impacts from on-site noise sources; cumulative noise impacts from off-site construction traffic; and Project and cumulative vibration impacts associated with human annoyance from off-site construction traffic.

### a. Construction Noise

As discussed in Section IV.E, Noise, of this Draft EIR, implementation of Mitigation Measure NOI-MM-1 provided therein would reduce the Project's and cumulative construction noise levels to the extent feasible. Specifically, implementation of Mitigation Measure NOI-MM-1 (installation of temporary sound barriers) would reduce the noise generated by on-site construction activities at the off-site sensitive uses, by a minimum 11 dBA at the residential uses on east side of Grand Avenue (receptor location R1) and on the south side of 8th Street (receptor location R5), and by 6 dBA at the residential uses at the southwest corner of 8th Street and Hope Street (receptor location R6). The specified sound barriers along the Project eastern and southern boundaries would also reduce the construction-related noise levels at the residential use at the southwest corner of 8th Street and Olive Street (receptor location R2) and at the residential use on Grand Avenue (receptor location R4) by minimum 5 dBA. The estimated construction-related noise levels at off-site sensitive receptor locations R1, R2, R4, R5, and R6 would be reduced to below a level of significance with implementation of Mitigation Measure NOI-MM-1 at the ground

level. However, the temporary sound barriers would not be effective in reducing the construction-related noise levels for the upper levels of these residential buildings, including the seven-story apartment building at receptor location R1, the 33-story apartment building at receptor location R2, the 9-story apartment building at receptor location R4, the 24-story apartment building at receptor location R5, and the 22-story apartment building at receptor location R6. In order to be effective, the temporary noise barrier would need to be as high as the building (i.e., up to 33 stories), which would not be feasible (i.e., cost prohibitive and impractical). Other mitigation measures such as moveable noise barriers and modification to the construction equipment mix were considered. However, these were found to be infeasible. Specifically, moveable noise barriers are generally limited in height, typically 6- to 8-feet high and are not practical in reducing associated with moveable construction equipment (e.g., an excavator or bulldozer). With respect to the construction mix, as discussed in detail in Section V, Alternatives, of this Draft EIR, reducing the number of construction equipment by 43 percent would reduce construction noise levels by up to approximately 2.8 dBA, which would not reduce the impacts at the upper levels of the sensitive receptors to a less than significant level. In addition, reducing the construction equipment would increase the overall construction duration and the number of days that sensitive receptors would be impacted by construction activities. Furthermore, due to the close proximity of the off-site noise sensitive receptors (e.g., receptor locations R1 and R5 that are located across the street from the Project Site), it would not be feasible to reduce the on-site construction noise levels to below the significance threshold as a single piece of equipment would result in noise levels above the significance threshold. There are no other feasible mitigation measures to further reduce the construction noise at the upper levels of receptor locations R1, R2, R4, R5, and R6 to below the significance threshold. Therefore, Project construction noise impacts associated with on-site noise sources would remain significant and unavoidable.

In the event of concurrent construction activities by the Project and Related Project Nos. 10 and 30, there would be potential cumulative noise impacts at the nearby sensitive uses (e.g., residential uses). Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures (e.g., providing temporary noise barriers) for each individual related project. The Project's proposed mitigation measures would reduce the Project's contribution to on-site cumulative noise to the extent feasible. However, even with these mitigation measures cumulative noise impacts would continue to occur and there are no other physical mitigation measures that would be feasible. As such, cumulative noise impacts from on-site construction activities would be significant and unavoidable.

Based on the related projects in the vicinity of the Project Site and their truck routes, cumulative noise due to construction truck traffic from the Project and other related projects has the potential to increase the ambient noise levels along the truck route by 5 dBA.

Specifically, if the total number of trucks from the Project and related projects were to add up to 52 truck trips per hour along Pico Boulevard, 35 truck trips along James M. Wood Boulevard/9th Street, and 45 truck trips along Olive Street, the estimated noise level the truck trips plus the ambient would be would increase the ambient noise levels by 5 dBA and exceed the significance criteria.<sup>1</sup> Conventional mitigation measures, such as providing temporary noise barrier walls to reduce the off-site construction truck traffic noise impacts, would not be feasible as the barriers would obstruct the access and visibility to the properties along the anticipated truck routes. There are no other feasible mitigation measures to reduce the temporary significant noise impacts associated with the cumulative off-site construction trucks. As such, cumulative noise impacts from off-site construction traffic would be significant and unavoidable.

## **b. Construction Vibration (Human Annoyance)**

As discussed in Section IV.E, Noise, of this Draft EIR, on-site construction activities would result in short-term vibration impacts associated with human annoyance. In addition, based on the estimated ground-borne vibration levels from construction delivery/haul trucks traveling the anticipated haul route(s), Project vibration impacts associated with human annoyance would be significant without mitigation. It would not be feasible to install a wave barrier along the public roadways.<sup>2</sup> 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 Project's potential vibration human impacts associated with human annoyance from on- and off-site construction activities, and impacts would be significant and unavoidable.

To the extent that other related projects use the same haul route as the Project, potential cumulative vibration impacts associated with human annoyance associated with temporary and intermittent vibration off-site from construction haul trucks traveling along the designated haul route(s) would be significant and unavoidable.

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<sup>1</sup> *It is estimated that the noise level along 8th Street (with 52 truck trips per hour), James M. Wood Boulevard/9th Street (with 35 truck trips per hour), and Olive Street (with 45 truck trips) would be 70.6, 69.6 and 70.0 dBA, respectively. When added to the existing noise levels, the cumulative noise levels would equal to 72.3 (along 8th Street), 71.4 (along James M. Wood Boulevard/9th Street) and 71.7 dBA (along Olive Street), which would exceed the ambient noise levels of 67.3, 66.4, and 66.7 dBA by 5.0 dBA, respectively.*

<sup>2</sup> *A wave barrier is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise).*

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

In addition to identification of a project's significant unavoidable impacts, CEQA Guidelines Section 15126.2(b) requires that an EIR describe the reasons why a project is being proposed, notwithstanding the effects of the identified significant and unavoidable impacts. The reasons why the Project has been proposed are grounded in a comprehensive list of project objectives included in Section II, Project Description, of this Draft EIR.

As discussed in Section II, Project Description, of this Draft EIR, underlying purpose of the Project is to develop a parcel with a high-quality mixed-use development that provides new multi-family housing and neighborhood-serving commercial/retail/restaurant uses that serves the community and promotes walkability. The underlying purpose and objectives of the Project are closely tied to the goals and objectives of the Central City Community Plan, which supports the objectives and policies of applicable larger-scale regional and local land use plans, including Southern California Association of Governments (SCAG) 2020–2045 Regional Transportation Plan/Sustainability Communities Strategy (2020–2045 RTP/SCS) and the City's General Plan.

As discussed in Section IV.D, Land Use, of this Draft EIR, the Project would increase the range of housing choices available to Downtown employees and residents by replacing a parking structure and surface parking lot with 580 multi-family residential units and neighborhood serving commercial, retail, and restaurant uses. These uses would contribute to the employment base of the Central City Community Plan area, add to the housing stock available to local residents, and continue building on the strengths of the existing labor force and businesses in Downtown Los Angeles. The Project's close proximity to the 7th Street/Metro Center Station and numerous bus lines would also encourage use of public transit, and the provision of bicycle parking areas would promote bicycle use. Ground level uses would also include extensive windows and continuous balconies would be situated 25 feet above grade to activate the street and sidewalk and introduce a human-scale element and visual interest to pedestrians. As such, the Project would provide opportunities to improve Downtown's pedestrian environment and circulation and reduce parking demand and vehicle miles traveled (VMT) by encouraging use of alternative modes of transportation available in the immediate vicinity of the Project Site.

The Project would also include features to support the goals of the 2020–2045 RTP/SCS that address improving the productivity of the region's transportation system, and supporting an integrated regional development pattern and transportation network, reducing greenhouse gas emissions and improving air quality. Specifically, 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 the Metro 7th Street/Metro Center Station, six Rapid bus lines, three Express lines and 28 Local lines in the Project Area. Additional transit lines include nine LADOT Commuter Express lines, five LADOT Downtown Area Short Hop (DASH) bus lines, eight Foothill Transit bus lines, two Orange County Transportation Authority bus lines, one Santa Monica Big Blue Bus line, and one Torrance Bus line. 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 High-Quality Transit Area (HQTA) and City of Los Angeles Transit Priority Area (TPA), as defined in the City's Zoning Information File No. 2452 and Public Resources Code Section 21099. In addition, the Project would provide 251 bicycle parking spaces and would enhance pedestrian activity in the area by providing improved sidewalks and human-scale commercial/retail/restaurant frontages on the ground floor, and planting additional street trees. The Project would be designed with LEED certified or equivalent green building standards and would feature vehicle parking spaces equipped with electric vehicle (EV) charging stations as well as additional facilities capable of supporting future electric vehicle supply equipment (EVSE). As such, consistent with SCAG's goals and objectives, 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.

With regard to the General Plan Housing Element, the Project would support the City's objective to provide an equitable distribution of housing opportunities by type and costs by providing a mixed-use development that would include a variety of new multi-family residential units. The Project would therefore also support and not conflict with the City's objective to plan the capacity for and encourage production of housing units of various types to meet the projected housing needs of the future population by introducing a range of new multi-family residential units to a site that currently provides parking uses. The Project would also support the City's objective to encourage the location of new multi-family housing in proximity to transit by locating a mix of multi-family housing types in an area well-served by public transit. The Project Site is located approximately two blocks from the Metro 7th Street/Metro Center Station and is currently served by a total of seven local and inter-city transit operators. Metro also operates four rail lines, six Rapid bus lines, three Express lines and 28 Local lines in the area. Additional transit lines within the Project vicinity include nine LADOT Commuter Express lines, five LADOT Downtown Area Short Hop (DASH) bus lines, eight Foothill Transit bus lines, two Orange County Transportation Authority bus lines, one Santa Monica Big Blue Bus line, and one Torrance Bus line.

The Project would also support objectives and policies of the General Plan Framework Element (Framework Element) Land Use Chapter. The Project would contribute to the needs of the City's existing and future residents, businesses, and visitors by replacing a parking structure and surface parking lot with a contemporary high-rise

development with 580 residential units and up to 7,499 square feet of ground floor, neighborhood-serving commercial/retail/restaurant uses. The Project would support the City's policy to provide for the siting and design of new development that enhances the character of commercial districts by introducing a mixed-use development within the Project Site that would feature a similar mix of land uses to the existing uses surrounding the Project Site. As such, the Project would create additional housing to meet a growing demand in the Downtown Center, provide short- and long-term employment opportunities, and would be consistent with the type of development that is envisioned for the Downtown Center. In addition, the Project's mix of uses, sidewalk design and landscaping improvements in an area with convenient access to public transit and opportunities for walking and biking would promote a safe and improved pedestrian environment and facilitate a reduction of vehicle trips and vehicle miles traveled.

The Project would promote the City's goals, objectives, and policies of the Framework Element's Urban Form and Neighborhood Design Chapter by introducing a new mixed-use development that would activate the existing site. Specifically, the Project would redevelop an existing parking structure and surface parking lot by providing a modern residential building with ground floor commercial, retail and restaurant uses that are in close proximity to transit stations and lines. The Project would also incorporate elements that promote individual and community safety such as security cameras; proper lighting of building entries and walkways to provide for pedestrian orientation and clearly identify secure pedestrian travel and reduce areas of concealment; and designing entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites.

Based on the above, the Project reflects a development that is consistent with the overall vision of the Central City Community Plan as well as with other primary land use plans such as SCAG's 2020–2045 RTP/SCS, the City's General Plan Housing Element, and Framework Element. As such, the benefits of the Project, including housing, employment, and opportunities for people to live, work, and recreate within one site, would outweigh the effects of the significant and unavoidable impacts of the Project, all of which are temporary construction impacts.

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

CEQA Guidelines Section 15126.2(c) indicates that an EIR should evaluate significant irreversible environmental changes that would be caused by implementation of a proposed project. As stated in CEQA Guidelines Section 15126.2(c), "[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit

future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. 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 not consume a large commitment of natural resources or result in significant irreversible environmental changes.

### **a. Building Materials and Solid Waste**

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

The Project’s potential impacts related to solid waste are addressed in the Initial Study prepared for the Project, which is included as Appendix A to this Draft EIR. As discussed therein, pursuant to the requirements of Senate Bill (SB) 1374, during construction of the Project, a minimum of 75 percent of construction and demolition debris would be diverted from landfills. In addition, during operation, the Project would provide on-site recycling containers within a designated recycling area for Project residents to facilitate recycling in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687) and the Los Angeles Green Building Code. In accordance with Assembly Bill (AB) 1826, the Project would also provide for the recycling of organic waste. The Project would adhere to State and local solid waste policies and objectives that further goals to divert waste. Thus, the consumption of non-renewable building materials such as aggregate materials and plastics would be reduced.

### **b. Water**

Consumption of water during construction and operation of the Project is addressed in Section IV.I.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. As evaluated therein, given the temporary nature of construction activities, the short-term and intermittent water use during construction of the Project would be less than the net new water consumption estimated for the Project at buildout. During operation, the

estimated water demand for the Project would not exceed the available supplies projected by the City of Los Angeles Department of Water and Power (LADWP), as confirmed by the Water Supply Assessment (WSA) prepared for the Project and included as Appendix I of this Draft EIR. Thus, LADWP concluded that it would be able to meet the water demand of the Project, as well as the existing and planned future water demands of its service area. In addition, the Project would implement a variety of sustainable features related to water conservation to reduce water use in accordance with the City of Los Angeles Green Building Code and as set forth in Section IV.I.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, in which water conservation measures in excess of code requirements are proposed pursuant to by Project Design Feature WAT-PDF-1. Thus, as evaluated in Section IV.I.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, while Project construction and operation would result in some irreversible consumption of water, the Project would not result in a significant impact related to water supply.

### **c. Energy Consumption**

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.B, 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 123,758 gallons of gasoline and approximately 199,955 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.002 percent of the 2022 (start year of Project construction) annual on-road gasoline-related energy consumption and 0.02 percent of the 2022 annual diesel fuel-related energy consumption in Los Angeles County.<sup>3</sup> Furthermore, as detailed in Section IV.B, Energy, of this Draft EIR, a total of approximately 39,547 kWh of electricity is anticipated to be consumed during Project construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. In addition, trucks and equipment used during construction activities would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Further, on-road vehicles (i.e., haul trucks, worker vehicles) would be subject to federal fuel efficiency requirements.

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<sup>3</sup> Refer to Appendix C of this Draft EIR for detailed energy calculations.

Therefore, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Thus, impacts related to the consumption of fossil fuels during construction of the Project would be less than significant.

During operation, the Project's increase in electricity and natural gas demand would be within the anticipated service capabilities of LADWP and the Southern California Gas Company (SoCalGas), respectively. Specifically, the Project's electricity and natural gas demand would represent 0.02 and 0.0005 percent, respectively, of LADWP and SoCalGas' projected sales in 2025. In addition, as discussed in Section IV.B, Energy, of this Draft EIR, the Project would comply with 2019 Title 24 standards and applicable 2019 CALGreen requirements. At buildout, the Project would result in an increase of 102,531 gallons of gasoline and 20,179 gallons of diesel per year, or a total of 122,710 gallons of petroleum-based fuels consumed per year. Transportation fuel usage during Project operational activities would represent approximately 0.002 percent of gasoline and diesel usage within Los Angeles County. In addition, as noted above, the Project is located in an HQTAs and TPA and includes a number of features that would reduce the VMT such as increase density, a mixed-use development, and transit accessibility.

Therefore, based on the above, the Project would not cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F to the CEQA Guidelines. In addition, Project operations would not conflict with adopted energy conservation plans. Refer to Section IV.B, Energy, of this Draft EIR, for further analysis regarding the Project's consumption of energy resources.

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

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

## e. Conclusion

Based on the above, Project construction and operation would require the irreversible commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources 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 would be less than significant, and the limited use of nonrenewable resources that would be required by Project construction and operation is justified to meet the City's and State's housing, transportation, and GHG policies.

## 4. Growth-Inducing Impacts

CEQA Guidelines Section 15126.2(e) 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 580 new residential units. According to the Department of City Planning, the estimated household size for multi-family housing units in the City of Los Angeles is 2.41 persons per unit.<sup>4,5</sup> Applying this factor, development of 580 residential units would result in an

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<sup>4</sup> *Based on a rate of 2.41 persons per multi-family unit based on the 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.*

increase of approximately 1,398 new residents.<sup>6</sup> According to the 2020–2045 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2019 is approximately 4,020,438 persons.<sup>7</sup> In 2025, the projected buildout year of the Project, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,193,714 persons.<sup>8</sup> Thus, the estimated 1,398 new residents generated by the Project would represent approximately 0.81 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2019 and 2025. Therefore, the Project’s residents would be well within SCAG’s population projections in the 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.

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

Based on employee generation rates developed by the City of Los Angeles VMT Calculator Documentation, the Project’s 7,499 square feet of new commercial/retail/restaurant uses would generate approximately 30 new employees.<sup>9</sup> According to the 2020–2045 RTP/SCS, the employment forecast for the City of Los Angeles Subregion is

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<sup>5</sup> As a note, the Initial Study for the 8th, Grand and Hope Project (Appendix A of this Draft EIR) applied an estimated rate of 2.43 persons per multi-family unit, which was the available rate provided by the City of Los Angeles at the time of publication of the Initial Study. This Draft EIR now utilizes the updated rate of 2.41 persons per multi-family unit provided by the City of Los Angeles.

<sup>6</sup> 580 residential units  $\times$  2.41 persons per unit = 1,398 persons.

<sup>7</sup> Based on a linear interpolation of 2016–2045 data.

<sup>8</sup> Based on a linear interpolation of 2016–2045 data.

<sup>9</sup> Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the employee generation rate 0.004 employee per square foot for “High-Turnover Sit-Down Restaurant” land use is applied to the 7,499 square feet.

approximately 1,878,052 employees in 2019 and approximately 1,937,555 employees in 2025.<sup>10</sup> As such, the Project's 30 estimated new employees would represent approximately 0.05 percent of the employment growth forecasted by SCAG in the City of Los Angeles Subregion between 2019 and 2025. 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/restaurant/retail 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, retail, and restaurant uses would be unlikely to create an indirect demand for additional housing or households in the area.

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

The area surrounding the Project Site is an urbanized area dominated by high rise buildings. Surrounding uses in the vicinity of the Project Site are developed with commercial, residential, office, retail, restaurant, multi-family, and parking uses, and the Project would not be a project that would remove obstacles to population growth as discussed in CEQA Guidelines Section 15126.2(e) (e.g., a major expansion of a waste water treatment plant). The Project Site is located within an urban area that is currently served by existing utilities and infrastructure. While the Project would require local infrastructure upgrades to maintain and improve water, sewer, electricity, and natural gas lines on-site and in the immediate vicinity of the Project Site, such improvements would be limited to serving Project-related demand, and would not necessitate major local or regional utility infrastructure improvements that have not otherwise been accounted and planned for on a regional level.

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<sup>10</sup> Based on a linear interpolation of 2016–2045 data.

## d. Conclusion

Overall, the Project would be consistent with the SCAG 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. Cultural Resources (Archaeological Resources)

As provided in the Archaeological Resources Assessment prepared for the Project and included as Appendix L of this Draft EIR, no archaeological resources were identified within the Project Site or immediate vicinity as a result of the California Historical Resources Information System (CHRIS) records search conducted at the South Central Coastal Information Center, archival review, or Native American coordination. Segments of the zanja network, specifically Zanja Nos. 8 and 8-R, have been mapped in the vicinity of the Project Site, though no documentation was found depicting these zanja segments within or immediately adjacent to the Project Site.<sup>11</sup> Based on these results, and in consideration of the severity of past impacts to subsurface soils that would have occurred during construction of the buildings occupying the Project Site, it appears there is little potential that any intact archaeological resources are present that could be impacted as a result of Project implementation. However, it is always possible that intact archaeological

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<sup>11</sup> *The closest segment of the Zanja Madre as mapped by Cogstone is more than a block from the Project Site.*

deposits and/or features are present at subsurface levels. As such, the Project would incorporate Mitigation Measure CUL-MM-1 to ensure that impacts to unanticipated archaeological resources during construction activities would be less than significant. Mitigation Measure CUL-MM-1 included in the Initial Study provided in Appendix A of this Draft EIR states prior to the start of ground-disturbing activities, the Applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology to carry out the following measure. A qualified archaeologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the archaeologist and the City of Los Angeles Department of City Planning and shall depend on the rate of excavation and grading activities and the materials being excavated. If archaeological materials are encountered, the archaeologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist. This mitigation measure represents procedural actions and would be beneficial in protecting archaeological resources that could potentially be encountered on-site. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

## **b. Geology and Soils (Paleontological Resources)**

Mitigation Measure GEO-MM-1 included in the Initial Study provided in Appendix A of this Draft EIR states that a qualified paleontologist would be retained to perform periodic inspections of excavation and grading activities. In the event that paleontological materials are encountered, the qualified paleontologist would temporarily halt development activity to assess and evaluate the discovered material(s). The certified paleontologist would provide recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource. Therefore, with implementation of this mitigation measure, potential impacts to any previously undiscovered paleontological resources would be reduced to less than significant. This mitigation measure represents procedural actions 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.

## **c. Noise and Vibration**

As discussed in detail in Section IV.E, Noise, of this Draft EIR, Mitigation Measure NOI-MM-1 requires temporary and impermeable sound barriers to be installed during

construction along: the eastern property line of the Project Site between the construction areas and the residential uses on the east side of Grand Avenue; the southern property line of the Project Site between the construction areas and residential uses across the Project Site to the south; and the western property line of the Project Site between the construction areas and residential uses at the southwest corner of 8th Street and Hope Street. The noise and vibration from installation of the temporary sound barrier would be short-term (i.e., would require one to two days) and would occur within the specified construction hours and days permitted by the City's noise regulations. Installation of the noise barriers would require limited digging or trenching. Thus, installation of the noise barriers would not require a large amount of construction equipment. In addition, noise levels associated with the sound barrier installation activities would be substantially less than the noise levels associated with other phases of construction. Upon completion of construction, the temporary sound barrier would be removed. As such, implementation of this mitigation measure would not result in additional adverse impacts not already accounted for in Section IV.E, Noise of the Draft EIR.

Mitigation Measure NOI-MM-2 requires that prior to the start of construction, the Applicant shall retain the services of a structural engineer or qualified professional to visit the multi-story parking structures adjacent to the Project Site to the north to inspect and document the apparent physical condition of the structures' readily-visible features. The inspection survey shall be made to the extent feasible from the public right-of-way and within the Project Site's property line. The Applicant shall also 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 property line of the parking structure adjacent to the Project Site to the north 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. In the event the regulatory level is triggered, the contractor shall halt the construction activities in the vicinity of the parking structure and visually inspect the building for any damage. The inspection would occur from the public right of way or within the Project Site's property line to the extent feasible. Results of the inspection must be logged, and repairs will be provided in the event any damage occurred. The contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level. Construction activities may then restart once the vibration level is measured and below the warning level. Vibration impacts (pursuant to the significance criteria for building damage) at the adjacent parking structures associated with on-site construction activities would be reduced to a less-than-significant level with implementation of Mitigation Measure NOI-MM-2 and compliance with LAMC Section 91.3307. This measure involves supervisory, inspection and monitoring activities along with use of light monitoring equipment. 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; agricultural and forest resources; objectionable odors; biological resources; cultural resources; geology and soils; hazards and hazardous materials; hydrology and water quality; physical division of an established community; mineral resources; airport and airstrip noise; population and housing; schools; parks and recreation; wastewater; stormwater drainage facilities; telecommunications; solid waste; and wildfire. A summary of the analysis provided in Appendix A for these issue areas is provided below.<sup>12</sup>

### a. Aesthetics

As detailed in the Initial Study, Senate Bill (SB) 743 [Public Resources Code (PRC) Section 21099(d)] sets forth guidelines for evaluating project aesthetics and parking impacts under CEQA, as follows: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” As previously discussed, the Project would represent a mixed-use residential project on an infill site within a TPA, as defined in the City’s Zoning Information File No. 2452 and Public Resources Code Section 21099. As such, the aesthetic and parking impacts of the Project shall not be considered significant impacts on the environment. Nonetheless, an analysis is provided in the Initial Study (Appendix A of this Draft EIR) for informational purposes only.

### b. Agricultural and Forest Resources

The Project Site is located in an urbanized area of the City of Los Angeles and is developed with a four-story parking structure and surface parking. The Project Site and

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<sup>12</sup> *The 8th, Grand and Hope Initial Study (May 2019), included as Appendix A of this Draft EIR, had proposed two development options for the Project: (1) a school, 547 residential units, and up to 7,499 square feet of commercial/retail/restaurant uses; or (2) 580 residential units and up to 7,499 square feet of commercial/retail/restaurant uses. Following the publication of the Initial Study, the option with development of a school was removed. As such, this Draft EIR refers to the Project as including 580 residential units and up to 7,499 square feet of commercial/retail/restaurant uses.*

surrounding area are not zoned for agricultural or forest uses, and no agricultural or forest lands occur on-site or in the Project area. Therefore, as determined in the Initial Study, no impacts on agricultural or forest resources would occur.

### **c. Air Quality**

No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402. With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses. In addition, on-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and therefore would not result in substantially adverse odor impacts. 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 currently occupied by a four-story parking structure and a surface parking lot. The Project is relatively flat with limited ornamental landscaping. Due to the urbanized and developed nature of the Project Site and 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. Thus, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (USFWS). There are no riparian or other sensitive natural communities, or federally protected wetlands as defined by Section 404 of the Clean Water Act on the Project Site or in the surrounding area. In addition, there are no established native resident or migratory wildlife corridors on the Project Site or in the vicinity. Accordingly, development of the Project would not impact any regional wildlife corridors or native wildlife nursery sites. Furthermore, no water bodies that could serve as habitat for fish exist on the Project Site or in the vicinity. As the USFWS database of conservation plans and agreements does not show any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans applicable to the Project Site, as determined in the Initial Study, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans.

As discussed above, landscaping within the Project Site is limited. One street tree is situated along Hope Street, and six street trees line the sidewalk along 8th Street. No other trees are present within the Project Site. According to the Native Tree Protection Report prepared for the Project and included as Appendix IS-2 of the Initial Study, none of the trees along Hope Street and 8th Street are native or protected species. During construction, the 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. To the extent that vegetation removal activities must occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If any active nests are detected, the area would be flagged with a buffer (ranging between 50 and 300 feet, as determined by the monitoring biologist), and the area would be avoided until the nesting cycle has been completed or the monitoring biologist has determined that the nest has failed. As determined in the Initial Study, with compliance with this existing regulatory requirement, impacts to nesting and migratory birds would be less than significant.

### **e. Cultural Resources**

The Project Site is currently developed with a low-rise four-level parking structure and a surface parking lot and does not contain any historic resources. In addition, a review of the City's Historical Cultural Monuments List was conducted, which did not identify any historical cultural monuments adjacent to the Project Site. However, in the northern portion of the block containing the Project Site, fronting along 7th Street, is the Boston Store—J.W. Robinson's Building, which is a designated City Historic-Cultural Monument (HCM #357). However, this building is located approximately 250 feet north of the Project Site and is physically separated from the Project Site by a parking structure along Grand Avenue and a parking structure and a small church (Christian Science Church—Third Church of Christ, Scientist) along Hope Street. Due to the distance from HCM #357 to the Project Site and the intervening structures, the Project would not impact the building's designation as a City HCM. Therefore, as determined in the Initial Study, the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5, and potential impacts to historical resources would be less than significant.

In the event archaeological materials are encountered during construction, Mitigation Measure CUL-MM-1, discussed above, would ensure that a qualified archaeologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. Therefore, as concluded in the Initial Study, the implementation of Mitigation Measure CUL-MM-1 would ensure that any potential impacts related to archaeological resources would be less than significant.

With regard to human remains, while the uncovering of human remains is not anticipated, if discovered during construction, such resources would be treated in accordance with state law, including Section 15064.5 of the CEQA Guidelines, Section 5097.98 of the PRC, and Section 7050.5 of the California Health and Safety Code (HSC). 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 (NAHC) would be notified within 24 hours, and the guidelines of the NAHC 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, as determined in the Initial Study, the Project's impact on human remains would be less than significant.

## **f. Geology and Soils**

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

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

The Project Site is not located in an area that has been identified by the State or the City of Los Angeles as being potentially susceptible to liquefaction. The Geotechnical Report included as Appendix IS-4 of the Initial Study found that due to the depth of the historical highest groundwater level, the type of soils underlying the Project Site, and the liquefaction mapping by the City and State, the Project Site would not be susceptible to liquefaction during an earthquake event. As such, the Initial Study concluded that impacts associated with liquefaction would be less than significant.

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

Project construction activities, including grading, excavation, and other construction activities, have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. As discussed in the Initial Study, with compliance with regulatory requirements that include the implementation of Best Management Practices (BMPs), impacts related to soil erosion would be less than significant.

The Project Site consists of 3 to 6 feet of existing fill material with alluvium soils found below. The fill primarily is comprised of silty sand and sandy silt. The deeper alluvium below is comprised of sand, occasional gravel, and some clayey to sandy silt, and are dense to very dense. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. The Geotechnical Report prepared for the Project identified the on-site geologic materials near surface soils to be in the moderate expansion range and the deeper materials in the infiltration zone to be in the low expansion range. As the Project would require excavation to a depth of 63 feet below ground surface to accommodate the proposed subterranean levels, the Project would remove soils in the moderate expansion range. Furthermore, construction of the Project would be required to comply with the California Building Code and supplemental requirements of the LAMC, as enforced by the City of Los Angeles. These requirements would include building foundation and other requirements appropriate to site-specific conditions that would be provided in accordance with the design level geotechnical investigation required by the City. Therefore, the Initial Study concluded that impacts related to 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.

With regard to paleontological resources, as discussed above, in the event that paleontological materials are encountered, pursuant to Mitigation Measure GEO-MM-1, a qualified paleontologist would temporarily halt development activity to assess and evaluate the discovered material(s). The certified paleontologist would provide recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource. Therefore, as concluded in the Initial Study, with implementation of this mitigation measure, potential impacts to any previously undiscovered paleontological resources would be reduced to less than significant.

## **g. Hazards and Hazardous Materials**

The Phase I and II Report (Appendix IS-6 of the Initial Study) included a review of environmental records for the Project Site and a site reconnaissance to identify potential on-site hazards. As discussed therein, the Project Site consists of a parking structure constructed in 1970 and an asphalt paved parking lot. The Project Site is not identified on the standard environmental government lists researched as part of the Phase I and II Report, including those compiled pursuant to Government Code Section 65962.5. As discussed in the Phase I and II Report, the nearest listed contaminated site to the Project Site is greater than 450 feet northeast of the Project Site at 600 W. 7th Street and is a case that has been closed in 1995 regarding a leaking underground storage tank (UST) site. A release of diesel fuel at this off-site property affected soil only. It is unlikely the soil or groundwater beneath the Project Site is impacted by this off-site property. As part of the Phase I and II Report, soil gas and soil samplings were completed at the Project Site. There was no evidence of an on-site release of total petroleum hydrocarbons (TPH) and/or volatile organic compounds (VOCs). All Title 22 metals in the soil were found to be at natural background concentrations. The sporadic detections of VOCs in soil gas do not pose a vapor intrusion hazard for the proposed structure with subterranean parking using the current CalEPA accepted risk analysis. The soil test data indicate that unrestricted reuse and off-site transfer of excavated soil is acceptable.

Due to the age of the parking structure currently located on the Project Site, the Phase I and II Report recommended that an asbestos survey be conducted by a certified asbestos consultant prior to demolition. It is also possible that lead-based paint was utilized on-site. In the event any suspect asbestos-containing materials or lead-based paint coatings are found, the Project would adhere to all federal, state, and local regulations prior to their removal. As concluded in the Initial Study, mandatory compliance with applicable federal and State standards and procedures would reduce associated risks to less-than-significant levels.

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. The Phase I and II Report stated there was no evidence or record of aboveground storage tanks (ASTs) or USTs. In the event an undocumented UST is identified on-site, it would be appropriately documented and removed according to LAFD regulations. The Project Site is located within a Methane Buffer Zone identified by City ZIMAS. Prior to construction, methane testing would be conducted adhering to LADBS regulations. In the event methane levels exceed acceptable levels, appropriate design measures will be identified in accordance with the methane seepage regulations contained in the LAMC (Chapter 9, Article 1, Division 71, Section

91.7104) and included in the Project's design.<sup>13</sup> Therefore, there would be a negligible risk of subsurface methane release. No other recognized environmental concerns or historic recognized environmental concerns were identified on the Project Site.

The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used in 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. Specifically, operation of the proposed uses would be expected to involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and petroleum products. 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. As concluded in the Initial Study, any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations.

There are no schools located within 0.25 mile of the Project Site. The Miguel Contreras Learning Complex is located approximately 0.75 mile northwest of the Project Site at 322 Lucas Avenue. John H. Liechty Middle School is located approximately 0.8 mile northwest of the Project Site at 650 South Union Avenue. Ninth Street Elementary School is located approximately 0.87 mile southeast of the Project Site at 835 Stanford Avenue. In addition, as discussed above, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of residential, educational, and commercial developments, including vehicle fuels, paints, oils, and transmission fluids, and impacts to schools would be less than significant.

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

According to the Safety Element of the City of Los Angeles General Plan and County of Los Angeles Department of Public Works, the nearest designated disaster route to the Project Site is Figueroa Street, approximately 870 feet to the west.<sup>14,15</sup> While it is

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<sup>13</sup> *Methane seepage regulations adopted by Ordinance No. 175,790, February 2004.*

<sup>14</sup> *Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.*

expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with the Project's Construction Traffic Management plan prepared pursuant to Project Design Feature TR-PDF-1 that would be implemented to ensure adequate circulation and emergency access. In addition, while the Project would generate traffic in the vicinity and result in some modifications to site access, the Project would comply with LAFD access requirements and would not impede emergency access within the vicinity. Thus, as discussed in the Initial Study, impacts related to implementation of an adopted emergency response plan would be less than significant.

There are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone<sup>16</sup> or within a City-designated fire buffer zone.<sup>17</sup> Furthermore, the Project would be developed and rehabilitated in accordance with LAMC requirements pertaining to fire safety. Additionally, the proposed residential and commercial uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Impacts would be less than significant. Therefore, the Project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. As such, the Initial Study concluded that impacts related to wildland fires would be less than significant.

## **h. Hydrology and Water Quality**

During Project construction, stormwater runoff could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems; on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff; and the storage, handling and use of chemicals could result in pollutant discharges. However, during construction, the Project would be required to implement standard erosion controls in accordance with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit that outlines BMPs to control stormwater runoff from the construction site and sediment and pollutants in this runoff. Project excavation and grading

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<sup>15</sup> *County of Los Angeles Department of Public Works, Disaster Route Maps, City of Los Angeles Central Area, August 2008.*

<sup>16</sup> *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 754 S. Hope St., 609 W. 8th St., and 625 W. 8th St, accessed June 7, 2021. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.*

<sup>17</sup> *City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.*

activities would be required to obtain a City grading permit that includes required erosion and sediment control requirements. In addition, as previously discussed, there was no evidence of ASTs, USTs, any containers of hazardous or unidentified substances, on-site disposal or landfill of solid waste, polychlorinated biphenyls (PCBs), heating and cooling equipment, or wastewater treatment or disposal systems; and the soil test data indicate that unrestricted reuse and off-site transfer of excavated soil is acceptable. Furthermore, the historically highest groundwater level for the Project Site was found to be approximately 70 feet below ground surface. As the maximum depth of excavation for the Project Site would be 63 feet, Project construction would not be anticipated to require dewatering or other groundwater withdrawals. As such, Project construction would not decrease groundwater supplies or interfere with groundwater recharge. Therefore, as concluded in the Initial Study, with compliance with NPDES requirements and City of Los Angeles grading permit regulations, Project construction would not violate any surface water or groundwater quality standards or waste discharge requirements, and impacts during construction would be less than significant.

During operation, the Project would introduce sources of potential stormwater pollution that are typical of residential and commercial developments (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with parking and circulation areas). However, during operation, the Project would be required under the City's LID Ordinance to implement BMPs on-site to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system. As mentioned above, the Project Site is located in an urbanized area and is developed with a low-rise four-level parking structure and a surface parking lot. The Project Site is devoid of landscaping and is entirely impervious, and the degree to which surface water infiltration and groundwater recharge currently occur on-site is negligible or non-existent. As the Project would include the addition of landscaped areas on the podium level and within the sidewalks (public right of way), the amount of impervious surfaces would be minimally reduced during Project operation and the proposed landscaping would slightly reduce the quantity and improve the quality of stormwater runoff generated on the Project Site. This system would include infiltration drywells that would be strategically placed so as not to significantly impact the environment or existing infrastructure. A combination of BMPs for stormwater treatment may also be used to meet the LID stormwater treatment requirements. As such, operation of the Project would not interfere with groundwater recharge.

With adherence with applicable regulations, Project operation would not violate surface water or groundwater quality standards or groundwater recharge, result in substantial erosion or siltation, and the impacts would be less than significant. Moreover, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Therefore, as concluded in the Initial

Study, Project impacts related to groundwater and water quality would be less than significant.

The Project Site is not located within a designated 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or City. The Project Site is located within an area designated as FEMA Zone X, which denotes an area where potential for flooding is minimal. The Project Site is located in an urbanized area of downtown Los Angeles and there are no rivers, streams, or other water bodies (natural or urban) that could flood flow on or through the Project Site. Therefore, as concluded in the Initial Study, the Project would not impede or redirect flood flows, and no impact would occur.

In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a flood control basin or within a dam inundation area or within an area potentially affected by a tsunami. There are no surface water bodies in the immediate vicinity. The nearest body of water to the Project Site is MacArthur Park Lake, approximately 1.3 miles northwest of the Project Site. The nearest reservoir is the concrete-lined, off-stream Silver Lake Reservoir, which is not held by a dam, located approximately 3.2 miles north of the Project Site. The Project Site is approximately 15 miles east of the Pacific Ocean. As discussed above, the Project Site and surrounding area are fully developed and generally characterized by flat topography. Thus, as concluded in the Initial Study, the Project would not be subject to the potential for the release of pollutants due to Project inundation by floodwaters, tsunamis or seiches, and the impact would be less than significant.

## **i. Land Use and Planning**

The Project Site is located in an urbanized area. Surrounding uses in the vicinity of the Project Site include commercial, residential, retail, restaurant, and parking uses as well as a church. The Project would replace the existing four-level parking structure and surface parking lot on-site with a new mixed-use project comprised of 580 residential units and up to 7,499 square feet of commercial/retail/restaurant uses. The proposed uses are consistent with types of land uses already present or under construction in the surrounding area. The proposed development would occur within the boundaries of the Project Site, and the sidewalks would be improved and include new landscaping. Therefore, as determined in the Initial Study, the Project would not physically divide an established community.

## **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. The Project Site is also not located within a City-designated oil field or oil drilling area. Therefore, the Initial Study concluded that no impacts related to mineral resources would occur.

## k. Noise

The Project Site is not located within 2 miles of an airport or within an area subject to an airport land use plan. The closest airport is LAX located approximately 10.5 miles southwest of the Project Site. Therefore, as concluded in the Initial Study, the Project would not expose people working in the Project area to excessive noise levels from airports or airstrips, and no impacts would occur.

## l. Population and Housing

The Project would result in the development of 580 residential units and up to 7,499 square feet of ground floor commercial/retail/restaurant space on a site currently occupied by a four-story parking structure and a surface parking lot. As such, the Project would increase the residential population within the Project Site.

According to the 2020–2045 RTP/SCS,<sup>18</sup> the forecasted population for the City of Los Angeles Subregion in 2019 is approximately 4,020,438 persons.<sup>19</sup> In 2025, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,193,714 persons.<sup>20</sup> Therefore, the projected population growth between 2019 and 2025 is approximately 173,276 persons. The estimated household size for the City of Los Angeles is 2.41 persons per unit.<sup>21</sup> Using this factor, the Project would generate an on-site population of up to approximately 1,398 persons and would represent approximately 0.81 percent of the anticipated population growth between 2019 and 2025.

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<sup>18</sup> *The Initial Study for the Project (Appendix A of this Draft EIR) referenced SCAG 2016–2040 RTP/SCS as it was the most recently available report at the time of the Initial Study publication. The 2020-2045 RTP/SCS is now utilized herein as the most recently available report for analysis. Nonetheless, as described below, consistent with the conclusion of the Initial Study, Project impacts related to population and housing would remain less than significant*

<sup>19</sup> *Based on a linear interpolation of 2016–2045 data.*

<sup>20</sup> *Based on a linear interpolation of 2016–2045 data.*

<sup>21</sup> *Based on a 2.41 persons per household rate for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates (2018) per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.*

According to the 2020–2045 RTP/SCS, the forecasted number of households for the City of Los Angeles Subregion in 2019 is approximately 1,411,069 households.<sup>22</sup> In 2025, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,499,207 households.<sup>23</sup> Therefore, the projected household growth in the City between 2019 and 2025 is approximately 88,138 households. Thus, the Project’s 580 residential units would constitute up to approximately 0.66 percent of the housing growth forecasted between 2019 and 2025. Therefore, the Project’s housing units would be well within SCAG’s housing projection for the Subregion.

The Project would generate approximately 30 new employees based on employee generation rates developed by the City of Los Angeles VMT Calculator Documentation. According to the 2020–2045 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2019 is approximately 1,878,052 employees.<sup>24</sup> In 2025, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,937,555 employees.<sup>25</sup> Therefore, the projected employment growth in the City between 2019 and 2025 is approximately 59,503 employees. Thus, the Project’s estimated 30 new employees would constitute approximately 0.05 percent of the employment growth forecasted between 2019 and 2025. Therefore, the Project would not cause an exceedance of SCAG’s employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities.

As analyzed above, the net new population and housing that would be generated by the Project would be within SCAG’s population and housing projections for the City of Los Angeles Subregion. Therefore, as concluded in the Initial Study, the Project would not induce substantial unplanned population or housing growth. Impacts related to population and housing would be less than significant.

Furthermore, while construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, project-related construction workers would not be expected to relocate their household’s place of residence as a consequence of working on the Project. Therefore, as concluded

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<sup>22</sup> Based on a linear interpolation of 2016–2045 data. SCAG forecasts “households,” not housing units. As defined by the U.S. Census Bureau, “households” are equivalent to occupied housing units.

<sup>23</sup> Based on a linear interpolation of 2016–2045 data.

<sup>24</sup> Based on a linear interpolation of 2016–2045 data.

<sup>25</sup> Based on a linear interpolation of 2016–2045 data.

in the Initial Study, the Project would not be growth-inducing from a short-term employment perspective.

In addition, it is anticipated that some of the employment opportunities provided by the Project (30 estimated employees) would be filled by then-existing vacancies in the housing market and others by any new residential developments that may occur in the vicinity of the Project Site. Therefore, as concluded in the Initial Study, 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.

### **m. Public Services (Schools and Parks)**

Public educational services for the Project Site and vicinity are provided by the Los Angeles Unified School District (LAUSD). The public schools that serve students in the Project Site vicinity include 9th Street Elementary School, John H. Liechty Middle School, and high schools in the Belmont Zone of Choice.<sup>26,27</sup> The Project includes the development of new residential land uses, which directly generate school-aged children and a demand for public educational services. Based on student generation factors provided by the LAUSD 2020 Developer Fee Justification Study, the Project may generate up to approximately 250 students, including 135 elementary school students, 37 middle school students, and 78 high school students.<sup>28,29</sup> As such, implementation of the Project

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<sup>26</sup> LAUSD, *Resident School Identifier*, <http://rsi.lausd.net/ResidentSchoolIdentifier/>, accessed June 9, 2021.

<sup>27</sup> *Belmont Zone of Choice high schools include: Ramon C. Cortines School of Visual & Performing Arts, Edward R. Roybal Learning Center, Belmont Senior High, Miguel Contreras Learning Complex—Academic Leadership Community, Miguel Contreras Learning Complex—Business and Tourism, Miguel Contreras Learning Complex—School of Social Justice, and Miguel Contreras Learning Complex—Los Angeles School of Global Studies.*

<sup>28</sup> *The 2020 LAUSD Developer Fee Justification Study provides student generation rates for Grades K–6, 7–8, and 9–12. For residential uses, the following student generation rates were applied: 0.2269 student per household for Grades K–6, 0.0611 student per household for Grades 7–8, and 0.1296 student per household for Grades 9–12. For the proposed commercial/retail/restaurant use, the “Neighborhood Shopping Center” rate of 0.000610 student per square foot was applied. Since the LAUSD Developer Fee Justification Study does not specify the grade levels of students that are generated from non-residential land uses, such students are assumed to be divided among the elementary, middle, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 54.3 percent for elementary school, 14.6 percent for middle school, and 31.0 percent for high school).*

<sup>29</sup> *The 8th, Grand and Hope Initial Study (May 2019), included as Appendix A of this Draft EIR, had proposed two development options for the Project: (1) a school, 547 residential units, and up to 7,499 square feet of commercial/retail/restaurant uses; or (2) 580 residential units and up to 7,499 square feet of commercial/retail/restaurant uses. Following the publication of the Initial Study, the school option was removed. As such, this Draft EIR refers to the Project as including 580 residential units and up to 7,499 square feet of commercial/retail/restaurant uses.*

would result in an increase in the number of students within the service area of the LAUSD. However, the Project would be required to pay school fees in accordance with Section 65995 of the Government Code. Per these provisions, the payment of these fees constitutes full and complete mitigation of a project's impacts on school facilities. Therefore, as concluded in the Initial Study, with compliance with Section 65995 of the Government Code, which requires payment of the school fees, impacts related to public educational services would be less than significant.

Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. There are over 30 parks and recreational facilities within a 2-mile radius of the Project Site.<sup>30</sup> Based on the number of units proposed, the Project is required to provide 63,600 square feet of open space. Due to the design used as a way of protecting the residents within the open space area from exposure to sun and rain elements, the Applicant is requesting a Zoning Administrator's Interpretation ("ZAI") to determine that building cut-outs (covered open space) functioning as outdoor open space for the Project would: (1) not create floor area as defined in LAMC Section 12.03; and (2) shall count as open space as defined in LAMC Section 12.21-G,2(a). With approval of the ZAI, the Project would provide 65,193 square feet of total open space.<sup>31</sup> Furthermore, while the Project's residents, visitors, and some of the new employees would be expected to use off-site public parks and recreational facilities to some degree, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. In addition, pursuant to LAMC Section 12.33, subdivision projects consisting of more than 50 residential units are subject to a Quimby in-lieu fee. All other residential projects are subject to a park mitigation fee. LAMC Section 12.33 requires all new subdivisions containing residential dwelling units or joint living and work quarters to dedicate land, pay a fee, or provide a combination of land dedication and fee payment for the purpose of developing park and recreational facilities for new residents. Although the Project would not include dedicated parkland, LAMC Section 17.12 provides that common open space may be partially credited against a project's land dedication requirement if approved by the City. However, there is the potential that some or all of the Project's recreational amenities may not be credited toward the Project's land dedication requirement, in which case the Project would be required to pay in-lieu fees as determined by the City. Through one or a combination of these methods, as determined by the City, the Project would comply with LAMC Sections

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<sup>30</sup> *City of Los Angeles Department of Recreation and Parks, Facility Map Locator, [www.laparks.org/maplocator](http://www.laparks.org/maplocator), accessed July 9, 2021.*

<sup>31</sup> *The 8th, Grand and Hope Initial Study (May 2019), included as Appendix A of this Draft EIR, had proposed up to 63,544 square feet of total open space. Following the publication of the Initial Study, the Project modified the provided open space and included the request for a Zoning Administrator's Interpretation.*

12.33 and 17.12. Therefore, as concluded in the Initial Study, new or expanded public parks would not be required to serve the Project, and impacts would be less than significant.

## **n. Recreation**

As described above, many public parks and recreational facilities are located in the vicinity of the Project Site. While the population increase associated with the Project could generate additional demand for parks and recreational facilities in the vicinity of the Project Site, due to the amount, variety, and availability of the proposed open space to be provided within the Project Site, it is anticipated that Project residents would often utilize on-site open space to meet their recreational needs. As described above, the Project would provide a number of indoor and outdoor common open space areas and recreational amenities throughout the Project Site in a tiered terrace arrangement, including: a pool, gym, spa, yoga and fitness areas, juice bar, barbeque and dining areas, seating, event lawn, and lounge on Level 10; an indoor fitness/recreation area on Level 11; common indoor and outdoor open space featuring a board room, co-working spaces, kitchen, barbeque and dining areas, and fire pit and seating on Level 21; indoor amenities on Level 22; common indoor and outdoor open space featuring a spa, fire pit and seating, dining areas, bar, and lounges on Level 35; and indoor fitness and wellness amenities on Level 36. Therefore, while Project residents would be expected to use off-site public parks and recreational facilities to some degree, that use would be spread among the many parks and recreational facilities in the vicinity of the Project Site, and the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities.

In addition, while it is possible that some new employees may utilize local parks and recreational facilities, it is anticipated that the majority of Project employees would be more likely to use parks and recreational facilities near their homes during non-work hours. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, while the Project's employment opportunities could have the potential to indirectly increase the population of the Central City Community Plan area, new demand for public parks and recreational facilities associated with Project development would be limited.

Based on the above, the Project would not substantially increase the demand for off-site public parks and recreational facilities, such that substantial physical deterioration of those facilities would occur or be accelerated. As concluded in the Initial Study, the impact on parks and recreational facilities would be less than significant.

## o. Utilities and Service Systems

### (1) Wastewater

Wastewater generated by the Project would be collected and discharged into existing sewer mains and conveyed to the Hyperion Water Reclamation Plant (HWRP). The HWRP is a part of the Hyperion Service Area, which has an existing design capacity of approximately 550 million gallons per day (mgd) (consisting of 450 mgd at the Hyperion Water Reclamation Plant, 80 mgd at the Donald C. Tillman Water Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant).<sup>32,33,34</sup> The HWRP is designed to treat 450 mgd and currently processes an average of 275 mgd. As such, the HWRP has an available treatment capacity of approximately 175 mgd. According to LASAN's conservative assumptions of the Project as provided in the Wastewater Service Information Report (WWSI), which is included as Appendix K of this Draft EIR, the sewer system may be able to accommodate flow of up to 129,902 gallons per day (gpd) to the existing 8-inch sewer main on Hope Street.<sup>35</sup> Per LASAN, further detailed gauging and evaluation will be needed as part of the standard required building permit process to identify a specific sewer connection point; however, ultimately, as noted in the WWSI, sewage flow will be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for up to 129,902 gpd.<sup>36</sup> Furthermore, LASAN conservatively did not account for required water savings and additional water conservation commitments committed to by the Applicant (refer to the WSA included as Appendix I of this Draft EIR, and Project Design Feature WAT-PDF-1 in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR). As provided in Table VI-1 on page VI-32, after accounting for the implementation of required water savings and water conservation commitments and the Project's updated unit mix, the Project would generate

<sup>32</sup> City of Los Angeles Bureau of Sanitation (LASAN), Hyperion Water Reclamation Plant, [www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?\\_adf.ctrl-state=s4vffrigl\\_86&\\_afLoop=9148703519520976#!](http://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=s4vffrigl_86&_afLoop=9148703519520976#!), accessed July 9, 2021.

<sup>33</sup> LASAN, Donald C. Tillman Water Reclamation Plant, [www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-dctwrp?\\_adf.ctrl-state=s4vffrigl\\_86&\\_afLoop=9148800438155154#!](http://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-dctwrp?_adf.ctrl-state=s4vffrigl_86&_afLoop=9148800438155154#!), accessed July 9, 2021.

<sup>34</sup> LASAN, Los Angeles-Glendale Water Reclamation Plant, [www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-lagwrp?\\_adf.ctrl-state=s4vffrigl\\_86&\\_afLoop=9148852583300197#!](http://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-lagwrp?_adf.ctrl-state=s4vffrigl_86&_afLoop=9148852583300197#!), accessed July 9, 2021.

<sup>35</sup> City of Los Angeles Inter-Departmental Correspondence from LASAN to Department of City Planning, September 5, 2019. Refer to Appendix K of this Draft EIR.

<sup>36</sup> City of Los Angeles Inter-Departmental Correspondence from LASAN to Department of City Planning, September 5, 2019. Refer to Appendix K of this Draft EIR.

**Table VI-1  
Estimated Project Wastewater Generation**

Land Use	Units	Water Demand Rate (gpd/unit) <sup>a</sup>	Water Demand (gpd)
<b>Existing</b>			
Surface Parking Lot and Structure <sup>b</sup>	36,178 sf	—	0
<i>Total Existing</i>			0
<b>Proposed<sup>c</sup></b>			
Residential Apartment: Studio	108 du	75 gpd/du	8,100
Residential Apartment: 1-bedroom	258 du	110 gpd/du	28,380
Residential Apartment: 1-bedroom	66 du	150 gpd/du	9,900
Residential Apartment: 2-bedroom	143 du	150 gpd/du	21,450
Residential Apartment: 3-bedroom	5 du	190 gpd/du	950
Base Demand Adjustment (Residential) <sup>d</sup>	—	—	7,698
Commercial/Retail/Restaurant <sup>e</sup>	300 seats	30 gpd/seat	9,000
Pool	1,625 sf	—	153
Spa 1	150 sf	—	14
Spa 2	150 sf	—	14
Dog Run and Amenities	2,300 sf	0.10 gpd/sf	230
Pool and Fitness Deck <sup>f</sup>	16,685 sf	0.20 gpd/sf	3,337
Fitness and Amenities <sup>f</sup>	1,208 sf	0.20 gpd/sf	242
Co-work Amenities <sup>g</sup>	10,450 sf	0.12 gpd/sf	1,254
Meeting Room/Maker Space <sup>g</sup>	731 sf	0.12 gpd/sf	88
Amenity Deck <sup>g</sup>	6,766 sf	0.12 gpd/sf	812
Wellness Suite/Fitness <sup>f</sup>	1,253 sf	0.20 gpd/sf	251
Covered Parking <sup>h</sup>	251,962 sf	—	166
Cooling Tower <sup>i</sup>	1,400 tons	36 gpd/tons	49,896
<i>Total Proposed by Project</i>			141,935
<b>Required Savings<sup>j</sup></b>			
Residential Units	—	—	(17,000)
Other Uses	—	—	(981)
Cooling Tower	—	—	(30,851)
<i>Total Savings</i>			(48,832)
<b>Additional Conservation<sup>k</sup></b>			
<i>Total Conservation Commitments</i>	—	—	(3,836)
<b>Project Wastewater Generation Demand (Proposed – Required Savings – Additional Conservation – Existing to be Removed)</b>			<b>89,267</b>
<i>du = dwelling units</i>			

**Table VI-1 (Continued)  
Estimated Project Wastewater Generation**

Land Use	Units	Water Demand Rate (gpd/unit) <sup>a</sup>	Water Demand (gpd)
<p><i>gpd = gallons per day</i>  <i>sf = square feet</i>  <i>— = Information is not applicable.</i>  <i>All totals have been rounded and may not sum due to rounding.</i></p> <p><sup>a</sup> <i>Based on 100 percent of sewage generation rates provided by LASAN (effective April 6, 2012).</i></p> <p><sup>b</sup> <i>Based on LADWP billing data.</i></p> <p><sup>c</sup> <i>As a note, the Project’s WSA analyzed two development options. The School Option proposed 547 residential dwelling units, up to 7,499 square feet of commercial/retail/restaurant space, and 37,216 square feet dedicated to a charter school. The No School Option proposed 580 residential dwelling units and up to 7,499 square feet of commercial/retail/restaurant space. Following the LADWP Board’s approval of the WSA on November 19, 2019, the Project now only proposes the latter option with minor changes to parking and open space. LADWP recalculated the Project’s water demand based on the updated scope and concluded that no additional water supply assessment is required for the project because the project’s revisions do not meet one or more of the following conditions of the California Water Code Section 10910(h). Refer to emailed correspondence from Andrei Tcharssov of LADWP to Polonia Majas of Department of City Planning, December 30, 2020, and January 15, 2021 (Appendix I of the Draft EIR).</i></p> <p><sup>d</sup> <i>Based Demand Adjustment is the estimated savings due to Ordinance No. 180822 accounted for in the current version of LASAN sewage generation rates.</i></p> <p><sup>e</sup> <i>Conservatively assumes only restaurant uses and that 1 seat = 25 square feet.</i></p> <p><sup>f</sup> <i>The LASAN rate for “Gymnasium” is applied.</i></p> <p><sup>g</sup> <i>The LASAN rate for “Conference Room” is applied.</i></p> <p><sup>h</sup> <i>The LASAN rate for “Auto Parking” is applied and based on the assumption that cleaning occurs 12 times per year.</i></p> <p><sup>i</sup> <i>Based on the assumption that operation would be 24 hours per day, 7 days per week, and at a 55 percent chiller capacity.</i></p> <p><sup>j</sup> <i>The proposed development land uses will conform to City of Los Angeles Ordinance No. 184248, 2013 California Plumbing Code, 2013 California Green Building Code, 2014 Los Angeles Plumbing Code, and 2015 Los Angeles Green Building Code.</i></p> <p><sup>k</sup> <i>Water conservation due to additional conservation commitments as agreed to by the Applicant. See Table II of the WSA.</i></p> <p><sup>l</sup> <i>Note that this total is different than the total water demand in Table IV.I.1-5 in Section IV,I,1 Utilities and Service Systems—Water Supply and Infrastructure as landscaping water demand and required landscaping water savings are appropriately not included in the wastewater calculations.</i></p> <p><i>Source: LADWP, Water Supply Assessment for the 8th, Grand and Hope Project, November 19, 2019 (Appendix I of the Draft EIR); Emailed correspondence from Andrei Tcharssov of LADWP to Polonia Majas of Department of City Planning, December 30, 2020, and January 15, 2021 (Appendix I of the Draft EIR); Eyestone Environmental, 2021.</i></p>			

an average of approximately 89,267 gpd of wastewater, which would be a lower flow than that estimated by LASAN's conservative assumptions.<sup>37</sup>

Based on the above, the existing wastewater infrastructure is anticipated to have adequate capacity to serve the Project. Therefore, as concluded in the Initial Study, impacts to wastewater treatment facilities would be less than significant.

## (2) Stormwater Drainage

As discussed above, stormwater flows from the Project Site would not increase with implementation of the Project. Additionally, the Project would provide appropriate on-site drainage improvements to better control runoff. The Project would be required to comply with the City's LID Ordinance (Ordinance No. 181,899), which promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. To this end, BMPs would be implemented to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system. The proposed landscaping would reduce the quantity and improve the quality of stormwater runoff generated on the Project Site. This system would include infiltration drywells that would be strategically placed so as not to significantly impact the environment or existing infrastructure. A combination of BMPs for stormwater treatment may also be used to meet the LID stormwater treatment requirements. With implementation of these requirements, the on-site stormwater system would be designed to provide an overflow discharge that would flow into existing Los Angeles County Flood Control District facilities that would have adequate capacity to accommodate the Project Site flows. Therefore, the Project would not require the construction of new stormwater drainage facilities or expansion of existing facilities. Thus, as concluded in the Initial Study, impacts would be less than significant.

## (3) Telecommunications

The Project would require construction of new on-site telecommunications infrastructure to serve the new building 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. When considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site

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<sup>37</sup> Following the publication of the Initial Study (Appendix A of this Draft EIR), more detailed analysis of the wastewater generation was prepared, as provided in Table VI-1. Nonetheless, as described below, consistent with the conclusion of the Initial Study, Project impacts related to wastewater would remain less than significant.

work associated with connections to the public system. As concluded in the Initial Study, no upgrades to off-site telecommunications systems are anticipated, and any work that may affect services to the existing telecommunications lines would be coordinated with service providers.

#### (4) Solid Waste

The construction activities necessary to build the Project would generate debris, some of which may be recycled to the extent feasible. Pursuant to the requirements of Senate Bill (SB) 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, are disposed of in inert waste landfills. The County's inert landfill is the Azusa Land Reclamation landfill. The 2019 Countywide Integrated Waste Management Plan Annual Report estimates that the remaining permitted capacity of the Azusa Land Reclamation facility is 58.84 tons, as of December 31, 2019.<sup>38,39</sup> As shown in Table VI-2 on page VI-36, based on construction and debris rates provided by the U.S. Environmental Protection Agency (USEPA), the Project would generate a total of approximately 18,000 tons of demolition debris and 1,218 tons of construction debris, for a combined total of 19,218 tons of construction-related waste generation.<sup>40</sup> Applying the 75 percent diversion rate, the Project would dispose of approximately 4,805 tons of construction-related waste in Azusa Land Reclamation Landfill throughout the construction period. This amount of construction and debris waste would represent approximately 0.008 percent of the Azusa Land Reclamation Landfill's remaining disposal capacity of 58.84 million tons.<sup>41</sup> Thus, consistent with the conclusion in the Initial Study, the County's inert waste landfill would be able to accommodate Project-generated waste, and construction of the Project would not result in the need for an additional disposal facility to adequately handle Project construction-related waste.

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<sup>38</sup> County of Los Angeles, Department of Public Works, *Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020, Appendix E-2 Table 4.*

<sup>39</sup> *The Initial Study for the Project (Appendix A of this Draft EIR) referenced the Los Angeles County Integrated Waste Management Plan 2017 Annual Report published April 2019 as it was the most recently available report at the time of the Initial Study publication. The 2019 Annual Report is now utilized herein as the most recently available report for analysis. Nonetheless, as described below, consistent with the conclusion of the Initial Study, Project impacts related to solid waste would remain less than significant.*

<sup>40</sup> *Following the publication of the Initial Study, the demolition estimates were updated in the Draft EIR based on CalEEMod estimates as provided in Appendix B of this Draft EIR.*

<sup>41</sup> *4,805 tons ÷ 58.84 million tons = 0.008 percent.*

**Table VI-2  
Project Demolition and Construction Waste Generation**

Land Use	Size (sf)	Generation Rate <sup>a</sup> (lbs/sf)	Total (tons)
<b>Existing Uses to be Demolished</b>			
Parking	—	—	18,000 <sup>b</sup>
<i>Subtotal for Demolition</i>			<i>18,000</i>
<b>Proposed Uses to be Constructed</b>			
Residential Uses	547,428 sf	4.39	1,202
Commercial/Retail/Restaurant	7,499 sf	4.34	16
<i>Subtotal for Construction</i>			<i>1,218</i>
<b>Total (prior to recycling)</b>			<b>19,218</b>
<b>Total (after 75 percent recycling)<sup>c</sup></b>			<b>4,805</b>
<hr/> <i>lbs = pounds</i> <i>sf = square feet</i> <i>1 ton = 2,000 pounds</i> <sup>a</sup> USEPA, <i>Estimating 2003 Building-Related Construction and Demolition Materials Amounts</i> , Report No. EPA530-R-09-002, March 2009, Tables 2-1, 2-2, and 2-4. <sup>b</sup> Following the publication of the Initial Study, the demolition estimates were updated in the Draft EIR based on estimates from CalEEMod in Appendix B of this Draft EIR. Based on the conversion rate of 2,400 pounds per cubic yard for "Construction Debris, Asphalt or Concrete" as provided by CalRecycle, <i>Calculations, Solid Waste Cleanup Project Weights and Volumes for Project Estimates</i> , <a href="http://www.calrecycle.ca.gov/swfacilities/cdi/tools/calculations">www.calrecycle.ca.gov/swfacilities/cdi/tools/calculations</a> , accessed July 15, 2021. <sup>c</sup> Pursuant to requirements of SB 1374. Source: Eyestone Environmental, 2021.			

During operation, Project-generated solid waste would be collected by a private waste hauler and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. The estimated remaining capacity for the County's Class III landfills open to the City of Los Angeles is approximately 133.07 million tons as of December 31, 2019.<sup>42,43</sup> As shown in Table VI-3 on page VI-37, upon full buildout, the Project would

<sup>42</sup> County of Los Angeles, Department of Public Works, *Los Angeles County Integrated Waste Management Plan 2019 Annual Report*, September 2020, Appendix E-2 Table 4. This total excludes Class III landfills not open to the City of Los Angeles for disposal (i.e., Scholl Canyon, Whittier, Burbank, Pebbly Beach, and San Clemente). In addition, total excludes the Calabasas Landfill, as its watershed does not include the Project Site.

<sup>43</sup> The Initial Study for the Project (Appendix A of this Draft EIR) referenced the Los Angeles County Integrated Waste Management Plan 2017 Annual Report published April 2019 as it was the most recently available report at the time of the Initial Study publication. The 2019 Annual Report is now utilized herein as the most recently available report for analysis. Nonetheless, as described below, consistent with the conclusion of the Initial Study, Project impacts related to solid waste would remain less than significant.

**Table VI-3  
Estimated Project Solid Waste Generation<sup>a</sup>**

<b>Proposed Land Use</b>	<b>Size</b>	<b>Employee Generation Rate per sf<sup>b</sup></b>	<b>Estimated No. of Employees</b>	<b>Solid Waste Generation Rate<sup>c,d</sup></b>	<b>Total Generation (tons/year)</b>
Residential	580 du	N/A	N/A	2.23 tons/du/yr	1,293.4
Commercial/Retail/Restaurant	7,499 sf	0.004	30	2.98 tons/emp/yr	89.4
<b>Total</b>					<b>1,383</b>

*du = dwelling unit*  
*emp = employee*  
*sf = square feet*  
*yr = year*

<sup>a</sup> The 8th, Grand and Hope Initial Study (May 2019), included as Appendix A of this Draft EIR, had proposed two development options for the Project: (1) a school, 547 residential units, and up to 7,499 square feet of commercial/retail/restaurant uses; or (2) 580 residential units and up to 7,499 square feet of commercial/retail/restaurant uses. Following the publication of the Initial Study, the school option was removed. As such, this Draft EIR refers to the Project as including 580 residential units and up to 7,499 square feet of commercial/retail/restaurant uses, and this table provides the Project's updated solid waste calculations during operation.

<sup>b</sup> Employee Generation Rate from the City of Los Angeles VMT Calculator Documentation, May 2020, Table 1.

<sup>c</sup> Residential solid waste generation factor based on a rate of 12.23 pounds per household per day (or 2.23 tons per household per year), pursuant to the 2006 L.A. CEQA Thresholds Guide, p. M.3-2.

<sup>d</sup> Non-residential yearly solid waste generation factors from LASAN City Waste Characterization and Quantification Study, Table 4, July 2002. Assumes rate of 2.98 ton per employee per year for Retail—Restaurants use.

Source: Eyestone Environmental, 2021.

generate approximately 1,383 tons of solid waste per year.<sup>44</sup> The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as AB 939 which requires California cities, counties, and approved regional solid waste management agencies responsible for enacting plans and implementing programs to divert 50 percent of their solid waste away from landfills and compliance with AB 341, which requires California commercial enterprises and public

<sup>44</sup> The 8th, Grand and Hope Initial Study (May 2019), included as Appendix A of this Draft EIR, had proposed two development options for the Project: (1) a school, 547 residential units, and up to 7,499 square feet of commercial/retail/restaurant uses; or (2) 580 residential units and up to 7,499 square feet of commercial/retail/restaurant uses. Following the publication of the Initial Study, the school option was removed. As such, this Draft EIR refers to the Project as including 580 residential units and up to 7,499 square feet of commercial/retail/restaurant uses, and Table VI-3 provides the Project's updated solid waste calculations during operation.

entities that generate four or more cubic yards per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's recycLA 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.<sup>45</sup> The estimated annual net increase in solid requires California commercial enterprises and public entities that generate 4 cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Solid waste that would be generated by the Project represents approximately 0.001 percent of the remaining capacity for the County's Class III landfills open to the City of Los Angeles.<sup>46</sup> 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 open to the City of Los Angeles. Therefore, as concluded in the Initial Study, Project operation would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

The Project would also be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size. 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. As concluded in the Initial Study, as the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts related to regulatory compliance would be less than significant.

## p. Wildfire

The Project Site is located in an urbanized area, and there are no wildlands in the vicinity. As discussed above, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone<sup>47</sup> or fire buffer zone.<sup>48</sup> In addition, the Project Site is not

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<sup>45</sup> *L.A.'s Green New Deal, Sustainable City pLAn, 2019, Chapter 9.*

<sup>46</sup>  $1,383 \text{ tons per year} \div 133.07 \text{ million tons} = 0.001 \text{ percent.}$

<sup>47</sup> *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 754 S. Hope St., 609 W. 8th St., and 625 W. 8th St, accessed June 7, 2021. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.*

<sup>48</sup> *City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.*

located near State responsibility lands. Therefore, as concluded in the Initial Study, no impacts related to the wildfire risks would occur.