VI. Other CEQA Considerations

VI. Other CEQA Considerations

1. Significant Unavoidable Impacts

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

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

As evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, and summarized below, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with regard to on-site noise during construction and on- and off-site vibration during construction (pursuant to the threshold for human annoyance). Implementation of the Project would result in significant cumulative impacts that cannot be feasibly mitigated with regard to on- and off-site noise during construction and vibration impacts associated with off-site construction (pursuant to the significance threshold for human annoyance).

a. On-Site Construction Noise

As discussed in Section IV.F, Noise, of this Draft EIR, implementation of Mitigation Measure NOI-MM-1 provided therein would reduce the Project's construction noise levels to the extent feasible. Specifically, implementation of Mitigation Measure NOI-MM-1 (installation of temporary sound barrier) would reduce the noise generated by on-site construction activities at the off-site sensitive uses at the ground level by a minimum 15 dBA at the residential uses along Keswick Avenue and Orton Avenue (receptor location R1), 15 dBA at the Courtyard by Marriott and Century Park hotels adjacent to the Project Site to the east and north, respectively (receptor location R2), by a minimum 9 dBA at the residential uses on Lauriston Avenue (receptor location R3), 5 dBA at the residential uses at the northwest corner of Olympic Boulevard and Kerwood Avenue (receptor location R4), by a minimum 7 dBA at the residential uses on Kerwood Avenue (receptor location R5), and 15 dBA at the ground level of the residential uses on Kerwood Avenue (receptor

location R6).[1] The estimated construction-related noise levels at off-site sensitive receptor locations R3, R4, and R5 would be reduced to below a level of significance with implementation of Mitigation Measure NOI-MM-1. However, the estimated construction-related noise levels would still exceed the significance thresholds at receptor locations R1, R2 and R6. There are no other feasible mitigation measures that could be implemented to reduce the temporary noise impacts from on-site construction at receptor locations R1, R2, and R6. Therefore, construction noise impacts associated with on-site noise sources would remain significant and unavoidable and the Project's contribution would be cumulatively considerable.

b. Off-Site Construction Noise

As discussed in Section IV.F, Noise, of this Draft EIR, Project-level off-site construction noise impacts would be less than significant; however, cumulative noise impacts from off-site construction could be significant if construction haul trucks for the related projects and the Project were to utilize the same haul routes. As discussed in Section IV.F, Noise, of this Draft EIR, it is estimated that up to 37 truck trips per hour could occur along Pico Boulevard without exceeding the significance criteria of 5 dBA increase over the ambient noise levels. Therefore, if the total number of trucks from the Project and related projects were to add up to 38 truck trips per hour along Pico Boulevard, the estimated noise level from 38 truck trips per hour plus the ambient would be 70.8 dBA, which would increase the ambient noise levels by 5 dBA and exceed the significance criteria.[2] Since the Project would generate up to 13 truck trips per hour, an additional 25 truck trips from the Related Project No. 6 would increase the ambient noise level by 5 dBA or more along Pico Boulevard and Olympic Boulevard. Similarly, it is estimated that if the Project and related projects were to add up to 29 and 44 construction-related truck trips per hour along La Cienega Boulevard and Olympic Boulevard, respectively, the estimated cumulative noise would increase the ambient by 5 dBA and significance criteria. Therefore, 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, if construction haul trucks for the related projects and the Project were to utilize the same haul routes at the same time and generate the number of trips identified above. Given these uncertainties, it is not known whether these impacts would actually occur. Conventional mitigation measures, such as providing noise barrier walls to reduce the off-site traffic noise impacts, would not be feasible as the barriers would obstruct the access and visibility to the properties along the affected roadways. There are no other

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[1] *15 dBA is the typical maximum noise reduction provided by temporary construction noise barrier.*

[2] *It is estimated that with 38 truck trips, the noise level along Pico Boulevard would be 69.1 dBA, when added to the existing ambient of 65.8 dBA the cumulative noise levels would be 70.8 dBA, which would exceed the ambient by 5.0 dBA.*

feasible mitigation measures to reduce the potential significant impacts associated with the cumulative off-site construction noise. Therefore, potential impacts associated with the cumulative off-site construction noise would remain significant and unavoidable and the Project's contribution would be cumulatively considerable.

c. On-Site Construction Vibration (Human Annoyance)

As discussed in Section IV.F, Noise, of this Draft EIR, the estimated ground-borne vibration levels at receptor locations R1, R2 and R6 without mitigation would exceed the 72-VdB significance criteria during the demolition and grading/excavation phases with large construction equipment (i.e., large bulldozer, caisson drilling and loaded trucks) operating within 80 feet of receptor locations R1, R2, and R6. As discussed in Section IV.F, Noise, of this Draft EIR, conventional mitigation measures, such as providing a wave barrier, were considered. However, as wave barriers must be very deep and long to be effective, they are cost prohibitive for temporary applications such as construction, and therefore are 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 that could be implemented to reduce the temporary vibration impacts from on-site construction associated with human annoyance to a less-than-significant level. Therefore, Project-level vibration impacts from on-site construction activities with respect to human annoyance would be significant and unavoidable.

d. Off-Site Construction Vibration (Human Annoyance)

As discussed in Section IV.F, Noise, of this Draft EIR, the temporary vibration levels could reach approximately 75 VdB and 61 VdB periodically as trucks pass sensitive receptors along Olympic Boulevard at 20 feet and 60 feet, respectively. The residential and hotel uses along Olympic Boulevard would be exposed to ground-borne vibration levels up to 75 VdB, which would exceed the 72-VdB significance criteria from the construction trucks. The estimated ground-borne vibration at the Fox Studios (studios facing Olympic Boulevard) of 61 VdB would be below the 65-VdB significance threshold for studio uses. Vibration sensitive uses along Century Park East include residential uses, which are located approximately 30 feet from the roadway, which would be exposed to ground-borne vibration of 70 VdB and would be below the 72-VdB significance threshold. Vibration sensitive uses along Pico Boulevard include school and studio (Fox Studios) uses, which are located approximately 25 feet and 80 feet, respectively. The estimated ground-borne vibration from construction trucks would be 72 VdB (at the school use) and 57 VdB (at the studio uses), which would be below the 75-VdB and 65-VdB significance thresholds, respectively. There are residential and motel uses located approximately 25 feet along Overland Avenue and La Cienega Boulevard, respectively. The estimated ground-borne vibration at these sensitive uses would 72 VdB, which would be at the

72-VdB significance criteria. In addition, as discussed above, the temporary vibration levels from construction trucks passing residential and hotel uses along Olympic Boulevard could exceed the significance criteria. As discussed above, mitigation measures considered to reduce vibration impacts from off-site construction activities with respect to human annoyance included the installation of a wave barrier. However, as discussed above, wave barriers must be very deep and long to be effective and are not considered cost effective for temporary applications, such as construction. Further, construction of the wave barriers themselves would generate ground borne vibrations. In addition, it would not be feasible to install a wave barrier along the public roadways for the off-site construction vibration impacts. Therefore, potential impacts associated with the cumulative off-site traffic noise would remain significant and unavoidable and the Project's contribution would be cumulatively considerable.

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 provide a senior residential housing community that meets the needs of an increasingly aging population in the City by providing variety in housing together with integrated services. The underlying purpose and objectives of the Project are closely tied to the goals and objectives of the West Los Angeles Community Plan, which supports the objectives and policies of applicable larger-scale regional and local land use plans, including SCAG's Regional Transportation Plan/Sustainability Communities Strategy (RTP/SCS), and the City's General Plan.

As discussed in Section IV.E, Land Use and Planning, of this Draft EIR, the Project would not conflict with these applicable goals set forth in the RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would increase density on an already developed urban infill site in a City-designated TPA and SCAG-designated High-Quality Transit Area in close proximity to shopping, services and transit, and served by an established network of roads and freeways. Furthermore, the Project would provide: (1) bicycle parking spaces meeting LAMC requirements that would serve to promote use of bicycles; (2) enhanced sidewalks with new street trees and other improvements along the Project Site's Bellwood Avenue frontage; (3) electric vehicle

charging stations; (4) shuttle service for the Project's residents; and (5) a range of senior housing unit types to assist in addressing the demand for senior housing in the City, with a variety of on-site amenities on-site and connectivity to local services.

The Project would also develop a sustainable building which minimizes adverse effects on the environment and minimizes the use of non-renewable resources by complying with Title 24 energy conservation requirements and incorporating the environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. Furthermore, the Project would represent smart growth and sustainable development by intensifying density on an urban infill site in proximity to transit, providing shuttle service for the Project's residents, and providing charging stations for electric vehicles. Overall, as evaluated in Section IV.C, Energy, of this Draft EIR, the Project would not result in the wasteful or inefficient use of energy, and impacts would be less than significant.

With regard to the City's General Plan, the Project would be consistent with the policies set forth in the City's General Plan Framework Element. In particular, the Project would: (1) provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled (VMT) and air pollution through development of on an urban infill site served by existing infrastructure in a TPA within close proximity to shopping, services and transit, and providing pedestrian improvements such as pedestrian pathways and courtyards throughout the Project Site; (2) provide for the development of streetscape improvements by providing widened sidewalks, new street trees and other streetscape improvements along portions of Bellwood Avenue, and providing a pedestrian path within the Project Site; and (3) design multi-family residential development to minimize traffic and noise and that incorporates recreational and open space amenities for Project residents by proposing development that would result in less than significant transportation impacts and reduced VMT; locating parking, service, trash, laundry and kitchen facilities within the proposed building to minimize operational noise; and includes 14,630 square feet of open space (e.g., courtyards, outdoor bistros, landscaped terraces, walkways, etc.), which is in excess of 7,800 square feet of open space required by the LAMC.

Also, in support of the Framework Element, the Project would support the City's objective to plan the capacity for and develop incentives to encourage production of housing units of various types to meet the projected housing needs by income level of the future population by providing a project that would include 192 much needed senior housing residential units. Additionally, the Project would encourage proper design and effective use of the built environment to help increase personal safety and utilize development standards to promote development of open space that is as safe as possible by incorporating a range of security features including, but not limited to, private on-site security personnel, a closed circuit security camera system, restricted access, security

lighting, and maximizing visibility and minimizing areas of concealment. Furthermore, The Project would implement Best Management Practices (BMPs) and erosion control measures under the required Stormwater Pollution Prevention Plan (SWPPP) to minimize the potential for pollutants and sediment in stormwater runoff from the Project Site during the construction period and would implement the required Standard Urban Stormwater Mitigation Plan to do the same during operation. With implementation of the proposed infrastructure upgrades, including the upsizing of the water line along Bellwood Avenue, water supply, storage facilities and delivery systems would be adequate to serve the Project. In addition, the Project would comply with the City's Low Impact Development (LID) requirements and would thus improve water quality and provide adequate drainage throughout the Project Site.

Furthermore, the Project would be consistent with the applicable goals, objectives, and policies set forth in the West Los Angeles Community Plan. Specifically, by providing 192 senior housing residential units, the Project would provide for the development of new housing, promote housing accessible to more segments of the population including seniors, provide for adequate multi-family housing, promote greater individual choice in housing, and promote neighborhood preservation and preserve and enhance residential character. There is a growing need for eldercare facilities in Los Angeles because approximately 10 percent of the City's population is aged 65 years and older,[3] and the age distribution is expected to shift, and almost triple by 2035 in the greater Los Angeles area.[4] The Project would help meet this need and would result in a net increase in residential units on the Project Site. As discussed above, the Project would also reduce vehicle trips and congestion by developing new housing in proximity to adequate services and facilities and locating higher residential densities near commercial centers and major bus routes by increasing urban density on an urban infill site in a TPA within proximity to major commercial corridors, services and transit, reducing VMT. Although the Project would displace 112 multi-family housing units on the Project Site and the associated residents of those units, the Project would replace this housing with 192 eldercare housing units and would result in a net increase of 80 residential units (192 proposed units—112 existing units to be removed). In addition, the Applicant would comply with applicable requirements of the RSO and Ellis Act related to relocation.

Based on the above, the Project reflects a development that is consistent with the overall vision of the City and SCAG to locate supporting and synergistic uses within one site to create sustainable communities and enhance quality of life throughout the City and the region. As such, the benefits of the Project, as outlined above, would outweigh the

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[3] *According to United States Census 2010 data presented in the General Plan Housing Element.*

[4] *Chart 1.2 "Change in Age Distribution: Past and Projected, 2000-2010 &2010-2035" from Housing Element, page 1-5.*

effects of the significant and unavoidable impacts of the Project, which are all associated with short-term construction activities. Furthermore, as detailed in Section V, Alternatives, of this Draft EIR, no feasible alternative was identified that would eliminate all of the Project's significant and unavoidable impacts.

3. Significant Irreversible Environmental Changes

CEQA Guidelines Section 15126.2(c) indicates that an EIR should evaluate significant irreversible environmental changes that would be caused by implementation of a proposed project. As stated in CEQA Guidelines Section 15126.2(c), "[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. 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, during construction of the Project, a minimum of 75 percent of construction and demolition debris would be diverted from landfills. In addition, during operation, the Project would provide on-site recycling containers within a designated

recycling area for Project residents to facilitate recycling in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687) and the Los Angeles Green Building Code. In accordance with Assembly Bill (AB) 1826, the Project would also provide for the recycling of organic waste. The Project would adhere to State and local solid waste policies and objectives that further goals to divert waste. Thus, the consumption of non-renewable building materials such as aggregate materials and plastics would be reduced.

b. Water

Consumption of water during construction and operation of the Project is addressed in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. As evaluated therein, given the temporary nature of construction activities, the short-term and intermittent water use during construction of the Project would be less than the net new water consumption estimated for the Project at buildout. As discussed in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project would require the existing 4-inch line in Bellwood Avenue to be decommissioned, removed, and replaced with two new distinct water main extensions, including approximately 250 feet of new 8-inch line to be installed in the easterly half of Bellwood Avenue and approximately 213 feet of new 8-inch line to be installed in the westerly drive aisle of Bellwood Avenue. These two new 8-inch main lines would tie into the existing 12-inch main in Olympic Boulevard. These upgrades identified by LADWP would ensure adequate water capacity is provided for the Project. In addition, LADWP would be able to meet the water demand of the Project, as well as the existing and planned future water demands of its service area. Thus, as evaluated in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, while Project construction and operation would result in some irreversible consumption of water, the Project would not result in a significant impact related to water supply.

c. Energy Consumption

During ongoing operation of the Project, non-renewable fossil fuels would represent the primary energy source, and thus the existing finite supplies of these resources would be incrementally reduced. Fossil fuels, such as diesel, gasoline, and oil, would also be consumed in the use of construction vehicles and equipment. Project consumption of non-renewable fossil fuels for energy use during construction and operation of the Project is addressed in Section IV.C, Energy, of this Draft EIR. As discussed therein, construction activities for the Project would not require the consumption of natural gas but would require the use of fossil fuels and electricity. On- and off-road vehicles would consume an estimated 33,541 gallons of gasoline and approximately 153,345 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.001 percent of the 2021 annual

on-road gasoline-related energy consumption and 0.01 percent of the 2021 annual diesel fuel–related energy consumption in Los Angeles County.[5] Furthermore, as detailed in Section IV.C, Energy, of this Draft EIR, a total of approximately 17,268 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, long-term building construction lighting (longer than 120 days) is subject to Title 24 requirements which includes limits on the lighting wattage, which would result in the conservation of energy.[6] Furthermore, 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. Additionally, on-road vehicles (i.e., haul trucks, worker vehicles) would be subject to federal fuel efficiency requirements. Therefore, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Thus, impacts related to the consumption of fossil fuels during construction of the Project would be less than significant.

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 demand would represent less than 0.004 percent of LADWP projected sales in 2023. Additionally, the Project's natural gas demand would represent 0.00006 percent of the 2023 forecasted consumption in SoCalGas' planning area. As discussed in Section IV.C, Energy, of this Draft EIR, the Project would comply with 2019 Title 24 standards and applicable 2019 CALGreen requirements. In addition, the Applicant would also implement GHG-PDF-1 in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, which states that the design of new buildings would incorporate sustainability features (e.g., Energy Star–labeled products) and incorporate water conservation features, such as drip/subsurface irrigation. Also, under GHG-PDF-1, the Project would use LED lighting, which would reduce electricity used for lighting purposes compared to non-LED lighting. These measures would reduce the Project's energy demand in comparison to the Project without reduction features. Gasoline and diesel fuel consumption during operation are estimated to result in a net increase of 229 gallons of gasoline and 42 gallons of diesel per year, or a total of 271 gallons of petroleum-based fuels annually, respectively, which would represent a small percentage of gasoline and diesel fuel consumption in Los Angeles County. In addition, as noted in Section IV.E, Land Use and Planning, of this Draft EIR, VMT would be reduced by intensifying urban density on an urban infill site in close proximity to shopping, services, and transit; providing on-site pedestrian facilities and sidewalk improvements along its

[5] *Refer to Appendix D of this Draft EIR for detailed energy calculations.*

[6] *California Building Energy Efficiency Standards, Title 24, Part 6, §110.9, §130.0, and §130.2.*

Bellwood Avenue frontage; providing on-site bicycle parking; and providing shuttle service for the Project's senior residents.

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

d. Environmental Hazards

The Project's potential use of hazardous materials is addressed in the Initial Study for the Project, included as Appendix A to this Draft EIR. As evaluated therein, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used in an eldercare facility. Specifically, operation of the Project would be expected to involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, paints, and those used in maintenance landscaping. Operation of the Project could also involve the routine use of biohazards waste and cleaning agents. Construction of the Project would also involve the temporary use of potentially hazardous materials, including fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners. 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 requirements. Any associated risk would be reduced to a less than significant level through compliance with these standards and regulations. As such, compliance with regulations and standards would serve to protect against significant and irreversible environmental change that could result from the accidental release of hazardous materials.

e. Conclusion

Based on the above, Project construction and operation would require the irreversible commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources and the Project Site for future generations or for other uses. However, the consumption of such resources would not be considered substantial and would be consistent with regional and local growth forecasts and development goals for the area. The loss of such resources would not be highly accelerated when compared to existing conditions and such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result from the Project, such changes are concluded to be less than significant, and the limited use of nonrenewable resources that would be required by Project construction and operation is justified.

4. Growth-Inducing Impacts

CEQA Guidelines Section 15126.2(d) requires that growth-inducing impacts of a project be considered in a Draft EIR. Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant that, for example, may allow for more construction in service areas). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, thus requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also require a discussion of the characteristics of projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Finally, the CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.

a. Population

The Project proposes 192 senior housing residential units, consisting of 46 studio memory care guest rooms, 51 one-bedroom assisted living guest rooms, 24 two-bedroom assisted living guest rooms, 43 one-bedroom independent living dwelling units, and 28 two-bedroom independent living dwelling units in an eldercare facility for persons aged 62 and older. Based on the generation rates used in the City of Los Angeles VMT Calculator, the Project would generate approximately 231 residents.[7] As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with three multi-family residential developments, consisting of 112 units, and associated structures and parking. To accommodate the Project's proposed uses, all existing structures would be removed. Assuming the 112 units were each occupied by one person, the Project would result in a net increase of 119 on-site residents.[8]

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[7] *Refer to the VMT calculation worksheets included in the Transportation Study provided in Appendix H. The VMT Calculator assumption of 231 Project residents is more conservative in evaluating VMT per capita; however, if full occupancy of the Project is assumed with one person per bedroom, the Project could generate up to 244 residents, which would result in a net increase of 132 residents as compared to 119 residents.*

[8] *As noted above, the VMT Calculator assumption of 231 Project residents is more conservative in evaluating VMT per capita; however, if full occupancy of the Project is assumed with one person per bedroom, the Project could generate up to 244 residents, which would result in a net increase of 132 residents as compared to 119 residents.*

According to SCAG's 2016-2040 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2019 was approximately 4,036,475 persons.[9] In 2023, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,145,604 persons.[10] Per the 2016–2040 RTP/SCS, the estimated 231 new residents generated by the Project would represent approximately 0.21 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2019 and 2023.[11]

According to SCAG's 2020–2045 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2019 was approximately 4,020,438 persons.[12] In 2023, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,135,955 persons.[13] Per the 2020–2045 RTP/SCS, the estimated 231 new residents generated by the Project would represent approximately 0.20 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2019 and 2023.[14]

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

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

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

11 *As noted above the VMT Calculator assumption of 231 Project residents is more conservative in evaluating VMT per capita; however, if full occupancy of the Project is assumed with one person per bedroom, the Project could generate up to 244 residents, which would represent approximately 0.22 percent of SCAG's projected population growth for the City of Los Angeles Subregion between 2019 and 2023 as compared to approximately 0.21 percent. As such, it would be well within SCAG's projections for the City of Los Angeles Subregion, and the conclusions of the analysis would remain the same.*

12 *Based on a linear interpolation of 2016–2045 data.*

13 *Based on a linear interpolation of 2016–2045 data.*

14 *As noted above the VMT Calculator assumption of 231 Project residents is more conservative in evaluating VMT per capita; however, if full occupancy of the Project is assumed with one person per bedroom, the Project could generate up to 244 residents, which would represent approximately 0.21 percent of SCAG's projected population growth for the City of Los Angeles Subregion between 2019 and 2023 as compared to approximately 0.20 percent. As such, it would be well within SCAG's projections for the City of Los Angeles Subregion, and the conclusions of the analysis would remain the same.*

that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, construction workers would not be expected to relocate to the Project vicinity as a direct consequence of working on the Project. Therefore, given the availability of construction workers, the Project would not be considered growth-inducing from a short-term employment perspective. Rather, the Project would provide a public benefit by providing new employment opportunities during the construction period.

Based on the generation rates used in the City of Los Angeles VMT Calculator, the Project would generate approximately 88 employees.[15] According to SCAG's 2016-2040 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2019 was approximately 1,814,575 employees.[16] In 2023, the City of Los Angeles Subregion is anticipated to have approximately 1,882,104 employees.[17] Per the 2016–2040 RTP/SCS, the estimated 88 employees would constitute approximately 0.13 percent of the employment growth forecasted between 2019 and 2023.

According to SCAG's 2020–2045 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2019 was approximately 1,878,052 employees.[18] In 2023, the City of Los Angeles Subregion is anticipated to have approximately 1,917,721 employees.[19] Per the 2020–2045 RTP/SCS, the estimated 88 employees would constitute approximately 0.22 percent of the employment growth forecasted between 2019 and 2023.

Accordingly, the Project's generation of residents and employees would be consistent with the population employment projections contained in the 2016–2040 and 2020–2045 RTP/SCS.

In addition, the proposed eldercare facility use 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

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[15] *Refer to the VMT calculation worksheets included in the Transportation Study provided in Appendix H.*

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

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

[18] *Based on a linear interpolation of 2016–2045 data.*

[19] *Based on a linear interpolation of 2016–2045 data.*

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 uses would be unlikely to create an indirect demand for additional housing or households in the area.

c. Utility Infrastructure Improvements

The area surrounding the Project Site is already developed with a mix of residential and commercial uses, and the Project would not remove impediments to growth. The Project does not propose any roadway improvements that would introduce new roads or expand roadway capacity. The proposed realignment of the portion of Bellwood Avenue that bisects the Project Site would replace a segment of the existing street through the Project Site to facilitate efficient development of the Project Site. With regard to water infrastructure improvements, the Project would require an existing 4-inch line to be decommissioned, removed, and replaced with two new distinct water main extensions, including approximately 250 feet of a new 8-inch line to be installed in the easterly half of Bellwood Avenue and approximately 213 feet of a new 8-inch line to be installed in the westerly drive aisle of Bellwood Avenue. These two new 8-inch main lines would tie into the existing 12-inch main in Olympic Boulevard. These upgrades identified by LADWP would ensure adequate water capacity is provided for the Project. The Project would also require the abandonment and removal of the existing 325 feet of 8-inch sewer line within Bellwood Avenue on the Project Site and adjacent on-site lateral lines as well as construction of on-site wastewater infrastructure to serve the new building, and potential limited extension/upgrade and/or relocation of existing adjacent public wastewater infrastructure. Furthermore, the Project would require local infrastructure upgrades to maintain and improve electricity and natural gas lines on-site and in the immediate vicinity of the Project Site. However, such improvements would be intended primarily to meet Project-related demand and would not necessitate regional utility infrastructure improvements that have not otherwise been accounted for and planned for on a regional level.

d. Conclusion

Overall, the Project would be consistent with the growth forecast for the City of Los Angeles Subregion and would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of VMT. In addition, the Project would not require any major roadway improvements nor would the Project open any large undeveloped areas for new use. Any access improvements would be limited to the realignment of the portion of Bellwood Avenue that bisects the Project Site and 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. Geology and Soils

Mitigation Measure CUL-MM-1 states that a qualified paleontologist would be retained in the event paleontological materials are encountered, and grading and excavation activities in the area of the exposed material would be temporarily diverted or redirected to facilitate evaluation and, if necessary, salvage. This mitigation measure represents procedural actions and would be beneficial in protecting cultural resources that could potentially be encountered on-site. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

b. Noise

Mitigation Measure NOI-MM-1 requires that prior to the start of earthmoving activities, a temporary and impermeable sound barrier shall be erected and maintained along portions of the Project Site to reduce noise levels at off-site sensitive receptors. The installation of this sound barrier would include limited construction activities associated with its installation. Any noise or other short-term impacts associated with this installation would not result in additional impacts beyond what has already been disclosed in the environmental analyses included in Chapter IV of this Draft EIR. As such, implementation of this mitigation measure would not result in adverse secondary impacts

Mitigation Measure NOI-MM-2 requires the use of large construction equipment (i.e., large bulldozer, caisson drill rig, and/or loaded trucks) be located a minimum of 13 feet away from the residences abutting the Project Site on the east side of Kerwood Avenue, 13 feet away from the commercial buildings (located at 10390 Bellwood Avenue and 10344 Olympic Boulevard) adjacent to the Project Site, and 6 feet away from the Century

Park hotel. This mitigation would not generate physical impacts on the environment, would be beneficial in reducing Project construction-related vibration impacts to the buildings adjacent to the Project Site, and would not result in adverse secondary impacts.

Mitigation Measure NOI-MM-3 requires the use of jackhammers be located a minimum of 6 feet away from the residences abutting the Project Site on the east side of Kerwood Avenue and the commercial buildings located at 10390 Bellwood Avenue and 10344 Olympic Boulevard. This mitigation would not include physical impacts on the environment, would be beneficial in reducing Project construction-related vibration impacts to the buildings adjacent to the Project Site, and would not result in adverse secondary impacts.

6. Effects Not Found to Be Significant

CEQA Guidelines Section 15128 states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the EIR. An Initial Study was prepared for the Project and is included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City of Los Angeles determined through the Initial Study that the Project would not have the potential to cause significant impacts related to aesthetics (scenic vistas, scenic resources, and light/glare); agriculture and forestry resources; air quality (odors); biological resources; cultural resources; geology and soils; hazards and hazardous materials; hydrology and water quality; land use and planning (division of an established community); mineral resources; noise (airport or airstrip-related noise); population and housing (induced population growth); public services (schools, parks, and libraries); recreation; stormwater drainage facilities; solid waste; and wildfire. A summary of the analysis provided in Appendix A for these issue areas is provided below.

a. Aesthetics

(1) Scenic Vistas

Due to the highly urbanized and built out surroundings, publicly available scenic vistas of any valued visual resources that may exist in the vicinity of the Project Site are not available. Therefore, development of the Project would not have the potential to substantially or adversely affect a scenic vista since none currently exist and no impacts would occur.

(2) Scenic Resources Within a State Scenic Highway

The Project Site is not located along a scenic highway as designated by the State. Therefore, the Project would not substantially damage scenic resources, including trees, rock outcroppings, and historic buildings or other locally recognized desirable aesthetic natural feature within a scenic highway and no impacts would occur.

(3) Light and Glare

New sources of light that would be introduced by the Project would include exterior lighting along the public areas that would include pedestrian-scale (i.e., lower to the ground, spaced closer together) fixtures. Exterior lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the Project Site. Project lighting would be designed to minimize light trespass from the Project Site and would comply with all LAMC requirements. Night lighting at the Project Site would be low profile and at the necessary intensity to provide a safe walkable environment along walking paths. Roof terrace lighting would be of similar light levels, directed downward towards walkable surfaces, and shielded from view of the adjacent residential neighbors. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would require approval from the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on sidewalks and roadways while minimizing light and glare on adjacent properties.

The proposed lighting sources would be similar to other lighting sources on the Project Site and in the Project Site vicinity and would not generate artificial light levels that are out of character with the surrounding area. Any new outdoor lighting provided by the Project would be low-level and would not result in a substantive change in ambient illumination levels over existing conditions. In addition, outdoor security and architectural lighting would be shielded and directed onto building surfaces and towards the interior of the Project Site to avoid light spillover onto sensitive uses. Project lighting would also meet all applicable LAMC lighting standards.

With regard to glare, building materials would include smooth troweled stucco, composite metal wall panels with wood finish, limestone panels and glass. In addition, all parking would be provided in a subterranean parking garage. As such, there would be limited potential from glare associated with parked vehicles. Glass used in building façades would also be low-reflective or treated with an anti-reflective coating to minimize glare. It is also noted that there is a grade difference ranging between approximately 14 feet to 42 feet from the adjacent single-family residential uses along the southern and eastern boundaries of the Project Site, such that the Project Site is situated below the

adjacent single-family residential uses. In addition, the backyards of these residential uses face the Project Site and include extensive existing landscaping. Further, the Project would incorporate additional perimeter landscaping to minimize views of the Project Site and any associated glare.

Based on the above, the Project would not create a new source of light or glare, which would adversely affect day or nighttime views in the area, and impacts would be less than significant.

b. Agricultural and Forest Resources

The Project Site is zoned as R3-1-O (Multiple Residential, Height District 1, Oil Drilling) and C2-1VL-O (Commercial, Height District 1VL, Oil Drilling) which permit a variety of residential and commercial uses. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site also does not include any forest or timberland. In addition, the Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation. The Project Site and surrounding area are also not enrolled under a Williamson Act Contract. As such, the Project would not convert farmland to a non-agricultural use, conflict with any zoning for agricultural uses or a Williamson Act Contract, conflict with existing zoning for, or cause rezoning of, forest land or timberland, result in the loss or conversion of forest land, or result in the conversion of farmland to non-agricultural use or in the conversion of forest land to non-forest use. No impacts to agriculture and forestry resources would occur.

c. Air Quality (Odors)

No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people.

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

In addition, the construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.[20] In particular, Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.[21] Therefore, with compliance with existing regulatory requirements, the Project would not create odors that would adversely affect a substantial number of people.

Based on the above, the Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant.

d. Biological Resources

The Project Site is located in an urbanized area and is currently developed with three multi-family residential developments and associated parking. Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings. Thus, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (USFWS). There are no riparian or other sensitive natural communities, or federally protected wetlands as defined by Section 404 of the Clean Water Act on the Project Site or in the surrounding area. In addition, there are no established native resident or migratory wildlife corridors on the Project Site or in the vicinity. Accordingly, development of the Project would not impact any regional wildlife corridors or native wildlife nursery sites. Furthermore, no water bodies that could serve as habitat for fish exist on the Project Site or in the vicinity. As the USFWS database of conservation plans and agreements does not show any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans applicable to the Project Site, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans.

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[20] *SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed June 20, 2021.*

[21] *SCAQMD, Rule 402, Nuisance.*

Landscaping within the Project Site consists of 96 ornamental trees and shrubs, including eight street trees located within the portion of Bellwood Avenue proposed to be vacated and realigned, as well as ornamental trees whose trunks are on adjacent property but include roots and canopies on the Project Site. There are no trees on the Project Site that are considered protected by the City of Los Angeles Protected Tree Ordinance. Of the 96 ornamental trees identified on the Tree Survey, 65 trees would be removed as part of the Project, including eight street trees. In accordance with the Department of City Planning's policy, the on-site trees to be removed would be replaced on a 1:1 basis. In addition, pursuant to the requirements of the City of Los Angeles Urban Forestry Division, the eight street trees to be removed would be replaced on a 2:1 basis. Removal of the existing street trees in the public right-of-way would occur in accordance with the policies of the Los Angeles Department of Public Works, Bureau of Street Services, Urban Forestry Division. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Removal of trees would comply with the Migratory Bird Treaty Act (MBTA), which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish & Game Code Section 3503 (Section 3503) states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." No exceptions are provided in the code and CDFW has not promulgated regulations interpreting these provisions. To ensure regulatory compliance with the Migratory Bird Treaty Act and California Fish and Game Code, the Project would require that tree removal activities would take place outside of the nesting season (February 1–August 31), to the extent feasible. In addition, should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. Compliance with the MBTA and California Fish and Game Code would ensure that impacts would be less than significant. Therefore, the Initial Study concluded that impacts to biological resources would be less than significant.

e. Cultural Resources

The Project Site, including the existing structures within the Project Site, has not been individually listed in or formally determined to be eligible for listing in the National Register or the California Register. In addition, the Project Site has not been designated as a Historic-Cultural Monument and is not located within an existing Historic Preservation Overlay Zone. Furthermore, as analyzed in the Historical Resource Assessment Report, included in Appendix A of this Draft EIR, the existing buildings on the Project Site are not eligible for historic designation in the National Register, the California Register, or as City of Los Angeles Historic-Cultural Monuments. Therefore, as no historic resources are located within the Project Site, removal of the existing buildings within the Project Site and

development of the Project would not create a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines. As such, the Initial Study concluded that impacts related to historical resources would be less than significant.

With regard to archaeological resources, the results of the archaeological records search conducted for the Project Site, included in Appendix A of this Draft EIR, indicate that there are no identified archaeological sites within the Project Site and one archaeological site located within a 0.5-mile radius of the Project Site. Nevertheless, the Project would require grading of the Project Site and excavations approximately 30 feet below grade, and previously unknown archaeological resources could be encountered. If an archaeological resource were to be discovered during construction of the Project, work in the area would cease, and deposits would first be evaluated for historic significance in accordance with CEQA Guidelines Section 15064.5. As set forth in CEQA Guidelines Section 15064.5, if the City determines that the archaeological resource is an historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code. If an archaeological resource does not meet the criteria for historical resources, but does meet the definition of a unique archaeological resource, construction work in the area would cease and the resource would be treated in accordance with the provisions of Section 21083.2 of the Public Resources Code. Therefore, given that there are no identified archaeological sites within the Project Site and the available regulations governing the treatment of any uncovered archaeological resources, the Project would not cause a substantial adverse change in the significance of an archaeological resource. As such, with the implementation of regulatory requirements, the Initial Study concluded that impacts to archaeological resources would be less than significant.

Lastly, as discussed in the Initial Study, included as Appendix A of this Draft EIR, no known traditional burial sites have been identified on the Project Site. In addition, if human remains were discovered during construction of the Project, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with Public Resources Code Section 5097.91 and 5097.98. With the implementation of regulatory requirements, the Project would not disturb any human remains. Therefore, the Initial Study concluded that the Project's impacts related to 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 or a Fault Rupture Study Area.[22] 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 prepared 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. In addition, subsurface soils at the Project Site are well-consolidated and dense, and would not be expected to liquefy, even if water were present. Further, the historically highest groundwater level at the Project Site is greater than 40 feet below ground surface. Development of the Project would not exacerbate existing conditions that would cause people or structures to be exposed to strong seismic ground shaking. Thus, the three conditions associated with the occurrence of liquefaction (i.e., shallow groundwater, low-density, sandy soils, and strong ground motion) do not all exist on the Project Site. As such, based on the underlying conditions of the Project Site, the Geotechnical Investigation concluded that the potential for liquefaction and associated ground deformation beneath the Project Site is very low. Therefore, the Initial Study concluded that impacts associated with liquefaction would be less than significant.

Along the southern and eastern boundaries of the Project Site there is a grade difference from the adjacent single-family residential uses such that the Project Site is situated below the adjacent single-family residential uses. While the Project Site is sloped down from those single-family residential uses, the backyards of those single-family residential uses abut the Project Site and most of those yards are heavily landscaped and/or feature a boundary wall. As such, large areas of exposed soil and/or rocks that could fall onto the Project Site would not typically exist within the single-family residences. In addition, the Project Site is not located in a landslide area as mapped by the State or the City of Los Angeles. Further, the Project would be required to comply with plan review and LADBS permitting requirements, including the recommendations provided in the LADBS

[22] *Los Angeles General Plan Safety Element, Exhibit A, Alquist-Priolo Special Study Zones & Fault Rupture Study Areas, November 1996, p. 47.*

Geology and Soils Report Approval Letter and site-specific geotechnical recommendations contained in a final design-level geotechnical engineering report. As such, the Initial Study concluded that there would be no impacts from landslides and impacts associated with 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, impacts related to soil erosion or the loss of topsoil would be less than significant.

The soils underlying the Project Site are primarily sandy soils. In addition, as discussed in the Geotechnical Investigation, based on the granular nature of the underlying soils, the Project would not be prone to the effects of expansive soils. Therefore, the Project would not be located on expansive soil that would create a substantial direct or indirect risk to life or property. In addition, through standard construction practices involving excavation activities and the associated removal of underlying soils as well as the subsequent use of engineered soils, any potential effects associated with expansive soils would be addressed. As such, the Project would not increase the expansion potential of underlying soils. Therefore, the Initial Study concluded that impacts related to unstable and expansive soils would be less than significant.

The Project's wastewater demand would be accommodated via connections to the existing wastewater infrastructure. As such, the Initial Study concluded that the Project would not require the use of septic tanks or alternative wastewater disposal systems and would not result in impacts related to the ability of soils to support septic tanks or alternative wastewater disposal systems.

g. Hazards and Hazardous Materials

The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used in the operation of eldercare facilities. Specifically, operation of the proposed uses would be expected to involve the routine use of small quantities of potentially hazardous materials typical of those used in residential and commercial uses, including cleaning products, paints, and those used for maintenance of landscaping. Operation of the Project could also involve the routine use of potentially hazardous materials typical of those used in a small medical facility, including biohazards waste and cleaning agents. As with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with all applicable federal, state and local requirements. As such, any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations.

The Phase I Environmental Site Assessment Report (ESA), included in Appendix A of this Draft EIR, included a review of environmental records for the Project Site and a site reconnaissance to identify potential on-site hazards and/or the handling of hazardous materials. During the site reconnaissance visit, no evidence of hazardous substances, aboveground storage tanks or USTs, polychlorinated biphenyls were identified on-site. Based on the age of the existing buildings on-site, there is a possibility that asbestos-containing materials (ACM) and lead-based paint (LBP) may be encountered during construction. In the event any suspect ACM or LBP is found, the Project would adhere to all federal, State, and local regulations prior to their removal. Mandatory compliance with applicable federal and State standards and procedures would reduce risks associated with ACM and LBP to less than significant levels.

The identification of a former gas and oil service station, located at the easternmost northern adjoining property (10236 West Olympic Boulevard), is not considered a recognized environmental condition (REC) as the site has since been redeveloped with a hotel and underground parking garage. Similarly, the identification of a former gas and oil service station at the western adjoining property located at 10350 West Olympic Boulevard is not considered a REC as the property was issued a case-closed designation in 2009, and the property has been redeveloped. However, the former gas and oil service station and auto repair operations on the westernmost northern adjoining property (10344 West Olympic Boulevard), and the existing dry-cleaning operations and smog and oil-change operations on the property are considered RECs. Tetrachloroethylene (PCE) was detected as recently as 2007 in wells located downgradient of the drycleaners which indicates that dry-cleaning operations may have impacted groundwater beneath the drycleaners and adjoining properties (including the Project Site). Based on the identified RECs, a Phase II ESA, included in Appendix A of this Draft EIR, was prepared to further evaluate the impacts to soil and soil vapor beneath the Project Site due to past and current operations at the northern adjoining property. The Phase II ESA also included an initial screening to evaluate whether methane was present in soil-vapor.

As evaluated in the Phase II ESA, methane was detected in eight of the 12 soil vapor probes at a concentration of 0.1 percent (or 1,000 parts per million) during the initial round of monitoring conducted on May 1, 2018. It is noted that this concentration is equal to the minimum detection limit of the instrument, and that the meter was recalibrated prior to conducting the second round of readings on May 2, 2018. Methane was not detected in any of the soil vapor probes during the second screening. Nevertheless, all new buildings and paved areas located within a Methane Zone would comply with the City of Los Angeles' Methane Mitigation Ordinance No. 175790. The soil vapor monitoring conducted at the Project Site did encounter PCE and trichloroethylene in excess of residential screening levels. However, the Phase II ESA determined that based on the levels encountered and implementation of applicable LADBS requirements, there would not be unacceptable health risk to occupants. In addition, adherence to standard construction

safety measures, as well as compliance with California Occupational Safety and Health Act safety requirements, would serve to reduce the risk in the event that elevated levels of these soil gases are encountered during grading and construction.

As discussed in the Phase II ESA, in the soil samples analyzed, PCE was detected in just one sample at a concentration that is less than the residential screening level, and no other VOCs were detected in any of the samples analyzed. Total petroleum hydrocarbons (TPH) in the heavy oil range was detected in three samples also below the residential screening level. TPH in the gasoline and diesel ranges were not detected in any of the soil samples. The likely source of the PCE concentration in soil is the adjacent dry-cleaning facility. The reported concentrations of oil range TPH could be related to the automotive service facilities on the north adjacent property. As concluded in the Phase II ESA, the soils at the Project Site do not appear to be significantly impacted and are believed to be acceptable for reuse onsite. In addition, based on the reported concentrations of VOCs and TPH in the soil samples analyzed, it is not anticipated that there would be any special handling or disposal requirements associated with soils that might be exported from the Project Site during construction. In the event that contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166. Therefore, compliance with existing regulations would ensure the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the handling and disposal of contaminated soil that may be encountered on-site.

Based on the above, with compliance with regulatory requirements, the Project would not result in a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment. Thus, as concluded in the Initial Study, impacts related to the release of hazardous materials into the environment would be less than significant.

There are no schools within 0.25 mile of the Project Site. However, the Project Site is located within 0.5 mile of Le Lycée Français De Los Angeles: Century City Campus at 10361 Pico Boulevard. Although the Project would have the potential to emit and would involve the handling of hazardous materials, particularly during construction activities, all such activities involving the handling and disposal of hazardous materials and wastes would occur in compliance with all applicable federal, state, and local requirements concerning the handling and disposal of hazardous waste. Therefore, with compliance with relevant regulations and requirements, the Project would not create a significant hazard to nearby schools, and impacts regarding the Project's emission or handling of hazardous materials and wastes would be less than significant.

The Project Site was not listed on any of the standard regulatory databases searched when the Phase I ESA was conducted. Therefore, the Project would not exacerbate existing conditions associated with these listed items because the Project Site itself is not listed on any of the databases that were reviewed in the Phase I ESA. Thus, impacts related to creating a hazard to the public or the environment would be less than significant.

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

According to the Safety Element of the City of Los Angeles General Plan, the nearest disaster route to the Project Site is Olympic Boulevard, which is located approximately 70 feet to the north of the Project Site and provides arterial access and is in the immediate vicinity of the Project Site.[23] Adjacent to the Project Site, Bellwood Avenue is a u-shaped street that connects to Olympic Boulevard at each end. As described in Attachment A, Project Description, of this Initial Study, as part of the Project, the portion of Bellwood Avenue that bisects the Project Site would be vacated and realigned. However, access to Olympic Boulevard would be maintained from both sides of Bellwood Avenue, including during construction. As such, the Project would not impair emergency access to Olympic Boulevard. 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,[24] nor is it located within a City-designated fire buffer zone.[25] Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. Additionally, the proposed residential uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, the Project would not subject people or structures to a significant risk of loss, injury, or death as a result of

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

[24] *City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 4315018034, 4315018033, 4315018032, 4315018031, 4315018030, and 4315018029, http://zimas.lacity.org/, accessed September 19, 2019. 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.*

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

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 construction of the Project, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use, and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. However, as Project construction would disturb more than 1 acre of soil, the Project would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. In accordance with the requirements of the permit, a SWPPP would be developed and implemented during construction of the Project. The SWPPP would set forth BMPs, including sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. With compliance with these existing regulatory requirements, impacts to water quality during construction would be less than significant.

Operation of the Project would introduce sources of potential stormwater pollution that are typical of residential uses. Stormwater runoff from precipitation events could potentially carry urban pollutants into municipal storm drains. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. As discussed in the Hydrology and Water Quality Memorandum, included in Appendix A of this Draft EIR, the existing Project Site does not have any structural or LID BMPs to treat or infiltrate stormwater. Therefore, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. Implementation of the proposed BMP system would result in the treatment of the entire required volume for the Project Site and the elimination of pollutant runoff up to the 85th percentile storm event. With the incorporation of LID BMPs and compliance with these existing regulatory requirements, operation of the Project would not result in discharges that would cause regulatory standards to be violated. Impacts on water quality during operation would be less than significant.

The historically highest groundwater level in the area is greater than 40 feet below ground surface (bgs). Anticipated excavation depths up to 30 feet bgs would occur to

provide for the new subterranean parking levels. Considering the historic high groundwater level, temporary dewatering are not expected to occur during construction. While dewatering during construction is not anticipated, in the event groundwater is encountered during construction, temporary dewatering systems such as dewatering tanks, sand media particulate, pressurized bag filters, and cartridge filters would be utilized in compliance with the NPDES permit. Thus, construction of the Project would result in less-than-significant impacts related to groundwater.

With regard to groundwater recharge, the percolation of precipitation that falls on pervious surfaces is variable, depending on the soil type, condition of the soil, vegetative cover, and other factors. The Project Site is currently approximately 89 percent impervious. With implementation of the Project, impervious surfaces would comprise approximately 87 percent of the Project Site. The increase in pervious areas would improve the groundwater recharge capacity of the Project Site over existing conditions. Thus, the Project would not interfere substantially with groundwater recharge such that groundwater management would be impeded.

Construction activities for the Project would involve removal of the existing structures and associated hardscape as well as the excavation and removal of soil. These activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as discussed above, in accordance with NPDES requirements the Project would implement a SWPPP that would specify BMPs and erosion/siltation control measures to be used during construction to manage runoff flows so that runoff would not impact off-site drainage facilities and receiving waters. In addition, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion.

As previously discussed, the Project Site is comprised of approximately 89 percent impervious surfaces under existing conditions. With implementation of the Project, the amount of landscaped area would increase, resulting in a decrease in the amount of impervious surfaces on the Project Site to approximately 87 percent. This increase in pervious surfaces would result in a reduction in stormwater runoff. Accordingly, there would be no increase in runoff volumes into the existing storm drain system. In addition, the implementation of BMPs required by the City's LID Ordinance would target runoff pollutants that could potentially be carried in stormwater runoff.

Based on the above, through compliance with all applicable NPDES requirements, including preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading regulations, the Project would not substantially alter the

existing drainage pattern of the Project Site or surrounding area such that substantial erosion, siltation, or on-site or off-site flooding would occur. Additionally, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Therefore, the impact would be less than significant.

The Project Site is not located within a 100-year flood plain as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles.[26,27] 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 potential inundation area.[28] The Project Site is located approximately 6 miles east of the Pacific Ocean, and the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami.[29] Therefore, no tsunami or tsunami events would be expected to impact the Project Site.

i. Land Use and Planning

The Project would replace the existing multi-family residential uses within the Project Site with a new residential eldercare facility. Additionally, as part of the Project, the portion of Bellwood Avenue that bisects the Project Site would be vacated and realigned. However, through public access would be maintained, and access to Olympic Boulevard from adjacent properties along Bellwood Avenue would continue to be available. In addition, the Project does not propose a freeway or other large infrastructure that would divide the existing surrounding community. Therefore, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant.

j. Mineral Resources

No mineral extraction operations currently occur on the Project Site. 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. While the Project Site is located within a City-

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[26] *Federal Emergency Management Agency, Flood Insurance Rate Map, Panel Number 06037C1595F, effective September 26, 2008.*

[27] *City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit F, p. 57.*

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

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

designated oil field or oil drilling area[30] as well as within the limits of the Cheviot Hills Oil Field,[31] according to the California Geologic Energy Management Division, previously known as the California State Division of Oil, Gas and Geothermal Resources, there are no wells located on the Project Site or adjacent properties, and the nearest known oil well is approximately 1,600 feet east of the Project Site and is currently inactive and plugged. Therefore, the Initial Study concluded that no impacts related to mineral resources would occur.

k. Noise

The Project Site is not located within the vicinity of a private airstrip or an airport land use plan or within 2 miles of an airport. The nearest airport is the Santa Monica Airport located approximately 2.8 miles southwest of the Project Site. Therefore, the Project would not expose people working in the Project area to excessive noise levels from airports or airstrips, and no impacts would occur.

l. Population and Housing

The Project would remove three existing multi-family residential developments with a total of 112 residential units and would construct 192 senior housing residential units. The Project would result in a net increase of 80 residential units compared to existing conditions. The proposed type of units is not typically associated with a substantial increase in population growth, but rather serving the need for senior housing. Therefore, as determined in the Initial Study, the Project would not induce substantial population growth in the area. With regard to infrastructure, all circulation improvements planned as part of the Project are intended to improve circulation flows and safety throughout the Project Site and vicinity. Any utility and other infrastructure improvements that may be required by the Project would be necessary to connect the proposed uses to the existing main infrastructure system. Therefore, impacts would be less than significant.

m. Public Services

(1) Schools

The Project would construct an eldercare facility for persons 62 years of age or older that would include 192 senior housing residential units. Although the Project would include

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[30] *City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit E, p. 55.*

[31] *California Department of Conservation, Division of Oil, Gas and Geothermal Resources, 2018, Well Finder, https://maps.conservation.ca.gov/doggr/wellfinder/#close, accessed November 13, 2018.*

residential uses, these residential uses are not the types of residential uses that would generate school-aged children and a corresponding demand for school services in the vicinity of the Project Site. Therefore, the development of the Project would not directly increase the number of students within the service area of LAUSD. In addition, the number of students that may be indirectly generated by the Project that could attend LAUSD schools serving the Project Site would not be anticipated to be substantial because not all employees of the Project are likely to reside in the vicinity of the Project Site. Furthermore, pursuant to Senate Bill 50, the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of the Project's building permit. Pursuant to Government Code Section 65995, the payment of these fees fully removes Project-related school impacts. Therefore, impacts would be less than significant.

(2) Parks

The proposed eldercare facility use is not typically associated with a substantial increase in the use of nearby parks as many of the residents rely on some form of care. Rather, these types of facilities generally provide a wide variety of activities and amenities onsite. The Project would provide 14,630 square feet of usable common and private open space, exceeding the LAMC-required amount of open space of 7,800 square feet. The proposed open space amenities include a 6,490-square-foot courtyard on Level P1 and a 2,740-square-foot terrace on the ground level. The P1 level would also provide 27,532 square feet of indoor common areas including a wellness center, gym, indoor pool and spa, common dining areas, and activity rooms. In addition, an outdoor terrace would be provided on each level between Level 2 and Level 6 for assisted living and independent living residents. Therefore, due to the amount, variety, and availability of the proposed open space and recreational amenities to be provided within the Project Site, it is anticipated that Project residents would utilize the on-site open space and common areas to meet their recreational needs. While it is possible that some of the Project's new employees may utilize local parks and recreational facilities, this increased demand would be negligible due to the nature of the employee's work. It is anticipated that the majority of Project employees, such as nurses, social workers, and caretakers, would be more likely to use parks and recreational facilities near their homes during non-work hours. Furthermore, it is anticipated that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site and who already generate a demand for parks. As such, the potential indirect growth in demand for parks and recreational facilities would be minimal and impacts would be less than significant.

(3) Other Public Facilities

Based on the type of residential uses proposed, the Project would not be expected to generate a substantial increase in the use of the Palms-Rancho Park Branch Library. Rather, the demand on library services may actually decrease as not all residents would be

physically able to travel to the library. In addition, as Project employees would be more likely to use library facilities near their homes during non-work hours and 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, Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library services. As such, any direct or indirect demand for library services generated by Project employees would be negligible. Therefore, impacts on library facilities would be less than significant.

n. Recreation

As discussed above, the proposed eldercare facility use is not typically associated with a substantial increase in the use of nearby parks and recreational facilities as many of the residents rely on some form of care and a wide variety of activities and amenities are provided on site. The Project's demand for parks and recreational facilities would be offset by the 14,630 square feet of usable open space that would be provided on-site. Due to the nature of the eldercare facility use, and the amount and availability of the proposed open space and recreational amenities within the Project, it is anticipated that Project residents would generally utilize on-site open space and common areas to meet their recreational needs. Thus, while some of the Project's residents may be expected to utilize off-site public parks and recreational facilities to some degree, 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. The impact on parks and recreational facilities would be less than significant.

o. Transportation

Through public access would be maintained from both sides of Bellwood Avenue through the Project Site, and the existing intersections of Bellwood Avenue and Olympic Boulevard would not be affected by the proposed realignment of Bellwood Avenue as part of the Project. In addition, the proposed realignment would not introduce any sharp curves or involve incompatible uses. Further, the proposed realignment of Bellwood Avenue would be subject to review and approval of the City Department of Building and Safety, Los Angeles Department of Transportation, and Bureau of Engineering to ensure adequate design. Additionally, the driveways and vehicular motor court for the Project would be placed along the realigned portion of Bellwood Avenue and would be designed and located at a distance from Olympic Boulevard to limit queue spillovers into the public right-of-way and interruptions to pedestrian flow and safety. Therefore, the Project's motor court and driveways would not substantially increase vehicle-vehicle conflicts and would not present any geometric design hazards as it related to traffic movement. The driveway design would not restrict sight lines, allowing drivers to safely identify approaching vehicles,

pedestrians, and bicyclists before committing to turn. Thus, impacts would be less than significant.

p. Utilities and Service Systems

(1) Stormwater

Development of the Project would result in an increase in the landscaped areas throughout the Project Site and would reduce the amount of impervious surfaces on the Project Site from approximately 89 percent to approximately 87 percent. Accordingly, there would be a decrease in runoff volumes into the existing storm drain system. In addition, the implementation of BMPs required by the City's LID Ordinance would target runoff pollutants that could potentially be carried in stormwater runoff. Therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant.

(2) Telecommunications Facilities

The Project Site is located in an area served by existing telecommunications infrastructure. Installation of new telecommunications infrastructure would primarily take place on-site, with minor off-site work associated with connections to the existing system. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. However, the Project would prepare a Construction Traffic Management Plan pursuant to Project Design Feature TR-PDF-1, which would ensure safe pedestrian access as well as emergency vehicle access and safe vehicle travel in general, to reduce any temporary pedestrian and traffic impacts occurring as a result of construction activities. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration and would cease to occur when installation is complete. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers.

(3) Solid Waste

The construction activities necessary to build the Project would generate debris, some of which may be recycled to the extent feasible. Pursuant to the requirements of Senate Bill (SB) 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa

Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. After accounting for mandatory recycling, the Project would result in approximately 764 tons of construction and demolition waste. Given the remaining permitted capacity the Azusa Land Reclamation facility, which is approximately 55.71 million tons, as well as the remaining 149.77 million tons of capacity at the Class III landfills serving the County, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

Upon full buildout, the Project would generate approximately 527 tons of solid waste per year. When accounting for the existing multi-family residential uses to be removed, the Project would result in a net increase in solid waste generation of 277 tons per year. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as compliance with Assembly Bill 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste Plan, 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.[32] The estimated annual net increase in solid waste that would be generated by the Project represents approximately 0.0002 percent of the remaining capacity (149.77 million tons) for the County's Class III landfills open to the City of Los Angeles.[33] As such, sufficient landfill capacity is expected to be available to accommodate the Project.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size. The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant.

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[32] *LA Sanitation, Solid Waste Integrated Resources Plan, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?_afrLoop=3608041245788654&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=8vrc5bges_179#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D3608041245788654%26_afrWindowMode%3D0%26_adf.ctrl-state%3D8vrc5bges_183, accessed December 13, 2018.*

[33] *(277 tons per year/149.77million tons) x 100 ≈ 0.0002%*

q. Wildfire

As discussed above, in Section 6.g, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone[34] or fire buffer zone.[35] In addition, the Project Site is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones. Therefore, no impacts related to the following would occur: (1) the impairment of an adopted emergency response plan or emergency evaluation plan related to wildfire; (2) the exposure of Project occupants to pollutant concentrations from a wildfire; (3) the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or (4) the exposure of people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes.

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[34] *City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 4315018034, 4315018033, 4315018032, 4315018031, 4315018030, and 4315018029, http://zimas.lacity.org/, accessed September 19, 2019. 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.*

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