

VI. Other CEQA Considerations

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1. Significant Unavoidable Impacts

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

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

As evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, and summarized below, implementation of the Project would result in significant and unavoidable Project-level impacts that cannot be feasibly mitigated with respect to on-site and off-site noise during construction, operational noise associated with loading activities, and on-site and off-site vibration during construction (pursuant to the threshold for human annoyance). The Project would also result in cumulative impacts that cannot be feasibly mitigated with respect to on-site and off-site noise during construction, operational noise associated with loading activities, and off-site vibration during construction (pursuant to the threshold for human annoyance). All other impacts associated with the Project would be less than significant or reduced with mitigation to less than significant.

a. On-Site Construction Noise

As discussed in Section IV.G, Noise, of this Draft EIR, on-site construction noise would result in significant impacts at receptor locations R1, R2, and R3 (residential uses). Implementation of Mitigation Measure NOI-MM-1 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, by a minimum 15 dBA at the residential use adjacent to the Project Site to the north (receptor location R1), 15 dBA at the residential uses on the west side of Holt Avenue (receptor location R2), and 7 dBA at the residential uses on the south side of Burton Way (receptor location R3). As presented in Table IV.G-20 in Section IV.G, Noise, the estimated construction-related noise levels at

off-site sensitive receptor location R3 would be reduced to less than significant with implementation of Mitigation Measure NOI-MM-1. However, the estimated construction-related noise levels would still exceed the significance threshold by 5.8 and 2.6 L_{eq} (dBA) at receptor locations R1 and R2 respectively with the implementation of NOI-MM-1. 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 and R2 because of their proximity to the Project Site. Therefore, Project-level construction noise impacts associated with on-site noise sources would remain significant and unavoidable.

The cumulative on-site noise impact at receptor location R1 would also be significant and unavoidable in the event of concurrent construction with Related Project No. LA6 (333 La Cienega Boulevard Project), a mixed-use project located approximately 100 feet east of the Project Site. Construction-related noise levels from the related projects would be intermittent and temporary and it is anticipated that, as with the Project, the related projects would comply with the construction hours and other relevant provisions set forth in the LAMC. Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for the Project and each individual related project and compliance with locally adopted and enforced noise ordinances. However, there are no other feasible mitigation measures that could be implemented to reduce the temporary noise impacts from on-site construction at the receptor locations because of their proximity to the Project Site. As such, the Project's incremental effect would remain cumulatively considerable after mitigation, and the cumulative on-site construction noise impact would be significant and unavoidable.

b. On-Site Construction Vibration (Human Annoyance)

As discussed in Section IV.G, Noise, of this Draft EIR, on-site construction vibration pursuant to the threshold for human annoyance would be significant at receptor locations R1 and R2 due to the operation of construction equipment including bulldozers, drilling, loaded trucks, and jackhammers. Mitigation measures considered to reduce vibration impacts from on-site construction activities with respect to human annoyance included the installation of a wave barrier (i.e., subterranean sound barrier). However, wave barriers must be very deep and long to be effective and are considered cost prohibitive for temporary applications, such as construction.¹ Moreover, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate ground-borne vibration from the excavation equipment. Thus, 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 and impacts would remain significant and unavoidable.

¹ Caltrans, *Transportation- and Construction-Induced Vibration Guidance Manual*, June 2004.

c. Off-Site Construction Noise

As discussed in Section IV.G, Noise, of this Draft EIR, the short-term noise impact associated with off-site construction traffic would be significant during the mat foundation phase along the anticipated haul routes along Holt Avenue, 3rd Street, La Cienega Boulevard, Cadillac Avenue, and San Vicente Boulevard. There are no feasible mitigation measures that could be implemented to reduce this short-term impact because conventional mitigation measures, such as providing temporary noise barrier walls to reduce the off-site construction truck traffic noise impacts, would not be feasible as the barriers would obstruct the access and visibility to the properties along the anticipated haul routes.

The cumulative off-site noise impact would also be significant and unavoidable if the trucks for the related projects use the same haul route as the Project. The estimated off-site construction noise levels from the Project would exceed the significance criteria along La Cienega Boulevard by 1.5 dBA. Therefore, any additional number of trucks from the Project and the related projects along La Cienega Boulevard would incrementally increase the noise levels, which would contribute to cumulative impacts. In addition, there are several related projects located along La Cienega Boulevard that could utilize La Cienega Boulevard, including: Related Project No. LA3 (1022 La Cienega Boulevard), Related Project No. LA6 (333 La Cienega Boulevard), and Related Project BH2 (55 La Cienega Boulevard). Related Project No. LA6 is estimated to generate up to 72 haul truck trips per day along La Cienega Boulevard.²

Therefore, cumulative noise due to construction truck traffic from the Project and other related projects (if there is concurrent construction) has the potential to increase the ambient noise levels along the truck route by more than 5 dBA. Conventional mitigation measures, such as providing temporary noise barrier walls to reduce the off-site construction truck traffic noise impacts, would not be feasible as the barriers would obstruct the access and visibility to the properties along the anticipated truck routes. There are no other feasible mitigation measures to reduce the temporary significant noise impacts associated with the cumulative off-site construction trucks. As such, the Project's incremental effect would remain cumulatively considerable, and the cumulative off-site construction noise impact would be significant and unavoidable.

² *City of Los Angeles, 333 La Cienega Boulevard Project Draft Environmental Impact Report, Page 4.3-27, May 2016.*

d. Off-Site Construction Vibration

As evaluated in Section IV.G, Noise, of this Draft EIR, residential uses along La Cienega Boulevard are located approximately 25 feet from the traveled lane, which would be exposed to ground-borne vibration of 72 VdB, the significance threshold for human annoyance. Mitigation measures considered to reduce vibration impacts from on-site construction activities with respect to human annoyance included the installation of a wave barrier. However, wave barriers must be very deep and long to be effective and are considered cost prohibitive for temporary applications, such as construction. Thus, 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. In addition, it would not be feasible to install a wave barrier along the public roadways for the off-site construction vibration impacts. In addition, as related projects would be anticipated to use similar trucks as the Project, it is anticipated that construction trucks would generate similar vibration levels along the anticipated haul route(s). As such, the Project's incremental effect would remain cumulatively considerable, and the cumulative off-site construction vibration impact would be significant and unavoidable.

e. Operational Noise

The noise impact associated with off-site traffic during Project operations would be less than significant without mitigation. However, the noise impact associated with the on-site loading activities would be significant at receptor location R1. Specifically, noise levels from the Project's loading dock would exceed the significance criteria by 3.0 dBA during loading activities at floors above the grade level at receptor location R1. Noise mitigation measures such as tall noise barrier walls or enclosures were evaluated. However, a noise barrier wall above six feet in height or an enclosure would not be feasible under the City's building code. There are no other feasible mitigation measures that could be implemented to reduce the impact from the loading dock along the alley to less than significant at the upper building levels of receptor location R1; thus Project-level impacts would remain significant and unavoidable. Additionally, the incremental noise impact associated with the intermittent loading dock operation would remain cumulatively considerable, and the cumulative operational noise impact would be significant and unavoidable.

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

In addition to identification of a project's significant unavoidable impacts, Section 15126.2(c) of the CEQA Guidelines states that where there are impacts that cannot

be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

As discussed above, the Project would result in significant Project-level and cumulative impacts that cannot be feasibly mitigated with respect to on-site and off-site noise during construction, operational noise associated with loading activities, and on-site and off-site vibration during construction (pursuant to the threshold for human annoyance). The Project's significant noise and vibration impacts would occur during construction for limited durations from construction equipment and haul trucks. Such impacts would be short-term and would cease upon completion of certain construction activities. Nevertheless, as evaluated in Section V, Alternatives, of this Draft EIR, alternatives to the Project were considered to eliminate the Project's significant noise and vibration impacts. As discussed therein, significant construction noise and vibration impacts would be expected to occur under any development scenario because of construction activities, the close proximity of sensitive receptors (residential uses) to the Project Site and along the haul route, and the need to demolish the existing buildings on the Project Site. Thus, reducing temporary construction noise and vibration impacts to below a level of significance with additional mitigation at adjacent sensitive receptors is infeasible. Furthermore, any reduction in the intensity of construction activities on an hourly or daily basis would increase the duration of the construction period and prolong construction noise.

The Project would also result in a significant and unavoidable impact with respect to loading-dock noise during operation. Due to the limited size of the Project Site (average 150 feet between the north and south property lines) and that the placement of the two loading docks adjacent to the existing alley is the most appropriate and least impactful location for the loading docks from a traffic standpoint (and consistent with LADOT policy), it was considered infeasible to move the loading dock to another location. In addition, although a six-foot noise barrier provided by Project Design Feature NOI-PDF-3 would reduce loading dock noise to less than significant for receptor location R1 at grade level, it is considered infeasible to significantly increase the height of the wall to block the line of sight to the upper floors of the 11-story Westbury Terrace condominium building (i.e., receptor location R1) on the other side of the alley. This results in the conservative conclusion that, when both loading docks are in simultaneous use (which would be a rare occurrence), some receptors on floors above grade at receptor location R1 could be exposed to a perceptible increase in noise levels that exceeds the applicable significance threshold. Moreover, among the alternatives considered, no feasible alternative was identified that would eliminate the Project's significant and unavoidable noise and vibration impacts. As discussed in Section V, Alternatives, of this Draft EIR, the Project, as proposed, satisfies the Project objectives to a substantially greater degree than any of the proposed alternatives. This Draft EIR also includes mitigation measures that reduce the potential impacts associated with the Project to the extent feasible.

As discussed in Section II, Project Description, of this Draft EIR, the Project includes the development of new multi-family residential units (including Very Low Income units) and the rehabilitation and limited alteration of the existing Our Lady of Mt. Lebanon–St. Peter Maronite Catholic Cathedral. As such, the Project would help support the City’s housing needs, and the localized need in the Wilshire Community Plan area. The underlying purpose and objectives of the Project are closely tied to the objectives of the Wilshire Community Plan, which support the objectives and policies of applicable larger-scale regional and local land use plans, including Southern California Association of Governments’ (SCAG) Regional Transportation Plan/Sustainability Communities Strategy (RTP/SCS) and the City’s General Plan.

The 2016-2040 RTP/SCS identifies mobility, accessibility, sustainability, and high quality of life, as the principles most critical to the future of the region. It also balances the region’s future mobility and housing needs with economic, environmental, and public health goals. Within the 2016-2040 RTP/SCS, the overarching strategy includes plans for “High Quality Transit Areas,” “Livable Corridors,” and “Transit Priority Areas” as key features of a thoughtfully planned, maturing region in which people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life. The 2020-2045 RTP/SCS, adopted by SCAG in September 2020, builds upon and expands land use and transportations strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The 2020-2045 RTP/SCS includes new initiatives at the intersection of land use, transportation, and technology to reach our region’s GHG reduction goals.

In support of the vision of SCAG’s 2016-2040 and 2020-2045 RTP/SCS, the Project would develop new housing and increase residential density on an infill site within a High Quality Transit Area, which would promote SCAG’s objectives to maximize mobility and accessibility for the region. The Project would also support SCAG’s goals to provide sustainable communities by creating an environmentally sensitive development. The sustainability features to be incorporated into the Project include, but would not be limited to the following: photovoltaic cells; recycled rainwater irrigation storage; greywater ready piping systems; sun shading devices; electric vehicle charging stations; material recycling stations; highly efficient HVAC systems; energy-efficient wall insulation and glazing units; WaterSense-labeled plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star–labeled appliances; and water-efficient landscape design.

The Project features a design with varied massing and materials to articulate the new buildings. It follows the northwest-to-southeast orientation of the preserved cathedral by aligning the new building elements, including the residential tower, with this axis. This results in a mix of angled forms that would break up street-facing elevations and avoid their perception as single flat surfaces. The design of the residential building reflects

an articulated, residentially scaled, contemporary architectural style with varied heights that maximize views to the sky for pedestrians. The residential building is designed to angle away from the condominium building to the north to maintain view privacy and respect the immediate setting of the cathedral. Building materials include precast integral-colored concrete and metal panels, textured integral-colored plaster, perforated metal panels and glass. Furthermore, the Project would incorporate project design features and mitigation measures that promote environmental sustainability. These include, but are not limited to, energy-efficient buildings, a pedestrian- and bicycle-friendly site design, and water conservation and waste reduction features, which would reduce the potential demand on Citywide infrastructure and energy resources.

The Project Site is located in an area that is well-served by public transit. The Project's location allows access to public transit and encourages alternative modes of transportation. In addition, the Project would provide short- and long-term bicycle parking to promote biking as an alternative mode of transportation. These beneficial features would support the City's policies to reduce vehicle miles traveled (VMT) and mobile source greenhouse gas (GHG) emissions.

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

3. Significant Irreversible Environmental Changes

Section 15126.2(d) of the CEQA Guidelines 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(d), "[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified."

The Project would necessarily consume a limited amount of slowly renewable and non-renewable resources that could result in irreversible environmental changes. This consumption would occur during construction of the Project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation. As demonstrated below, the Project would consume a limited commitment of natural resources and would not result in significant

irreversible environmental changes. Furthermore, the existing uses on the Project Site are currently consuming slowly renewable and non-renewable resources, and do not incorporate the conservation features the Project proposes. The Project would comply with all required regulations and standards related to potentially hazardous materials, which would serve to protect against significant and irreversible environmental change that could result from the accidental release of hazardous materials.

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 generation of solid waste is addressed in the Initial Study for the Project, which is included as Appendix A to this Draft EIR. 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's Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.³ The Project would also comply with Assembly Bill (AB) 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling.

During construction, the Project would comply with AB 1374 by implementing a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills serving the County. Therefore, the consumption of non-renewable building materials such as lumber, 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. In addition, the water

³ *Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.*

demand during construction would be less than the existing uses (estimated to be between 1,000 and 2,000 gallons per day [gpd] vs 3,524 gpd) and this water demand would be offset by the reduction of water demand currently consumed by the existing uses, the majority of which would be removed as part of the Project. During operation, the estimated water demand for the Project would not exceed the available supplies projected by the Los Angeles Department of Water and Power (LADWP) during normal, dry, or multiple dry years. Thus, LADWP would be able to meet the Project's water demand, as well as the existing and planned future water demands of its service area. In addition, pursuant to Project Design Feature WAT-PDF-1, the Project would implement a variety of water conservation features to reduce water use in addition to those measures required by the City of Los Angeles Green Building Code. Therefore, 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-site and off-road vehicles would consume an estimated 59,639 gallons of gasoline and approximately 174,301 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 projected the 2021 (construction start year) annual on-road gasoline-related energy consumption and 0.02 percent of the 2021 annual diesel fuel-related energy consumption in Los Angeles County. Therefore, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources as per Public Resources Code (PRC) Section 21100(b)(3). Therefore, impacts related to the consumption of fossil fuels during construction of the Project would be less than significant.

During operation, the Project's increase in electricity and natural gas demand would be within the anticipated service capabilities of LADWP and the Southern California Gas Company, respectively. As discussed in Section IV.D, Energy, of this Draft EIR, the Project would comply with 2019 Title 24 standards and applicable 2019 CALGreen requirements. In addition, new buildings and infrastructure would include electricity conservation features and additional features that would be capable of achieving LEED® certification or equivalent green building standards. Therefore, the Project would not cause the wasteful,

inefficient, and unnecessary consumption of energy. Furthermore, Project operations would not conflict with adopted energy conservation plans. Refer to Section IV.D, Energy, of this Draft EIR, for further analysis regarding the Project's consumption of energy resources.

d. Environmental Hazards

As discussed in Section IV.E, Hazards and Hazardous Materials of this Draft EIR, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used for residential and commercial developments. Specifically, operation of the Project would be expected to involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and petroleum products. Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable federal, state, and local regulations. In addition, there are regulations aimed at establishing specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. The Project would be in full compliance with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials. Any associated risk would be reduced to a less than significant level through compliance with these standards and regulations. Additionally, although the Project Site is located in a Methane Zone, the project geologist has proposed an alternative methane mitigation system designed by an architect, engineer or geologist that is equivalent to providing a permanent dewatering system and related mitigation as described in the City's methane mitigation requirements (LAMC Section 91.7104). As such, compliance with regulations and standards would serve to protect against significant and irreversible environmental change that could result from the accidental release of hazardous materials.

e. Conclusion

Based on the above, Project construction and operation would require the irretrievable commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources and the Project Site for future generations or for other uses. However, the consumption of such resources would not be considered substantial and would be consistent with regional and local growth forecasts and development goals for the area and are in part balanced against existing uses. 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(e) requires that growth-inducing impacts of a project be considered in a Draft EIR. Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant that, for example, may allow for more construction in service areas). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, thus requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines require a discussion of the characteristics of projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Finally, the CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.

a. Population

As discussed in Section II, Project Description, of this Draft EIR, the Project includes 153 multi-family residential units. According to the Department of City Planning, the most recent estimated household size for multi-family housing units in the City of Los Angeles area is 2.41 persons per unit.⁴ Applying this factor, development of 153 multi-family residential units would result in a net increase of approximately 369 residents.

According to the SCAG 2016–2040 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2019 was approximately 4,020,438 persons.⁵ In 2024, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,164,834 persons.⁶ Thus, the 369 estimated net

⁴ Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020. The Initial Study prepared for the Project and included as Appendix A to this Draft EIR used a rate of 2.6 persons per unit based on the previous 5-year estimate from the American Community Survey. The Department of City Planning subsequently confirmed that the new 2.41 average factor should be used.

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

⁶ Based on a linear interpolation of 2012–2040 data.

new residents generated by the Project would represent approximately 0.26 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2019 and 2024. Therefore, the Project's residents would be well within SCAG's population projections in both the 2016–2040 RTP/SCS for the City of Los Angeles Subregion and would not result in a significant direct growth-inducing impact.

According to the SCAG 2020-2045 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2019 was approximately 4,036,475 persons.⁷ In 2024, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,172,886 persons.⁸ Thus, the 369 estimated net new residents generated by the Project would represent approximately 0.27 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2019 and 2024. Therefore, the Project's residents would be well within SCAG's population projections in both the 2020-2045 RTP/SCS for the City of Los Angeles Subregion and would not result in a significant direct growth-inducing impact.

b. Employment

In addition to the residential population generated, the Project would have the potential to generate indirect population growth in the vicinity of the Project Site as a result of the employment opportunities generated by the Project.

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

The new residential use would not increase the number of church employees on the Project Site, nor would the cathedral rehabilitation and replacement of existing ancillary church buildings with a new church building increase the number of church employees on the Project Site. Therefore, the Project would not result in a substantial number of new church employees on the Project Site that could generate an associated indirect demand

⁷ Based on a linear interpolation of 2016–2045 data.

⁸ Based on a linear interpolation of 2016–2045 data.

for new housing in the area and induce substantial population growth. Therefore, the Project would not cause an exceedance of SCAG's employment projections contained in the both the 2016-2040 RTP/SCS and 2020-2045 RTP/SCS and the Project would be unlikely to create an indirect demand for additional housing or households in the area.

c. Utility Infrastructure Improvements

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

d. Conclusion

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

Section 15126.4(a)(1)(D) of the CEQA Guidelines states that "if a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed." With regard to this section of the CEQA Guidelines, the potential impacts that could result with the implementation of each mitigation measure proposed for the Project was reviewed. The following provides a discussion of the potential secondary impacts that could occur as a result of the implementation of the proposed mitigation measures, listed by environmental issue area.

a. Noise

Mitigation Measure NOI-MM-1 requires the use of temporary and impermeable sound barrier along the Project's northern, western, and southern property lines between the Project construction area and affected receptors to reduce construction-related noise levels. The temporary sound barrier shall be designed to provide 15-dBA noise reduction at ground level of the noise-sensitive receptors R1 and R2 and 7-dBA noise reduction at ground level of the adjacent noise sensitive receptor R3. The noise and vibration from installation of the temporary sound barrier would be short-term and would be required to comply with the City's noise thresholds. In addition, upon completion of construction, the temporary sound barrier would be removed. As such, implementation of this mitigation measure would not result in any adverse long-term secondary impact.

b. Transportation

Mitigation Measure TR-MM-1 requires the implementation of a transportation demand management (TDM) program for the Project which will include unbundled parking and promotions and marketing to educate and inform residents about alternative transportation options and the effects of their travel choices. This mitigation measure is administrative in nature and would not result in physical changes to the environment. As such, implementation of this mitigation measure would not result in any adverse secondary impact.

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 to this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City of Los Angeles determined through the Initial Study that the Project would not have the potential to cause significant impacts related to **aesthetics; agricultural and forestry resources; air quality**—odors; **biological resources; cultural resources**—archaeological resources and human remains; **geology and soils; hazards and hazardous materials**—hazardous materials sites, airport hazards, emergency response plans, and wildland fires; **hydrology and water quality; land use**—division of an established community; **mineral resources; noise**—airport noise and private airstrip noise; population and housing; **public services**—schools and parks; recreation; **transportation**—hazardous geometric design features and emergency access; **utilities and service systems**—wastewater, stormwater drainage facilities, and solid waste; and wildfire. A summary of the analysis provided in Appendix A for these issue areas is provided below.

a. Aesthetics

The Project is a mixed-use project located within one-half mile of the intersection of S. La Cienega Boulevard and 3rd Street, which qualifies as a major transit stop (as that term is defined in PRC Section 21064.3) because two or more bus routes intersect there that have service intervals of 15 minutes or less during morning and afternoon peak commute periods. Therefore, the Project Site is located in a transit priority area as defined in PRC Section 21099. The City's Zone Information and Map Access System (ZIMAS) also confirms the Project Site's location within a transit priority area, as defined in the ZI No. 2452. As a result, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA. Notwithstanding the mandate imposed by SB 743, the Initial Study included a discussion of aesthetics for informational purposes only.

As discussed therein, due to the highly urbanized and built out surroundings, predominantly flat terrain of the vicinity, and the dense intervening development that blocks long-range expansive views, scenic vistas of valued visual resources in the vicinity of the Project Site are not available. The Project would not damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. With respect to regulations governing scenic quality, the Project would be consistent with the urban design chapters of the City's General Plan Framework and Wilshire Community Plan. Lighting and glare associated with Project operation would not result in a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

b. Agricultural and Forest Resources

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

c. Air Quality

No objectionable odors are anticipated as a result of either construction or operation of the Project. Construction of the Project would use conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. The Project would not include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, fiberglass molding, or other land uses associated with odor

complaints. On-site trash receptacles which have the potential to create odors, would be contained, located, and maintained in a manner that promotes odor control such that no substantially adverse odor impacts would be anticipated. In addition, the construction and operation of the Project would also comply with South Coast Air Quality Management District (SCAQMD) Rules 401, 402, and 403 regarding visible emissions violations.⁹ In particular, SCAQMD Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.¹⁰ Thus, the Initial Study concluded that the Project's odor impact would be less than significant.

d. Biological Resources

The Project Site is located in an urbanized area and is currently developed with a one-story cathedral, ancillary church buildings, and a surface parking lot. Landscaping within the Project Site is limited, consisting of five (5) non-protected trees, shrubs, and grass areas. Due to the disturbed nature of the Project Site and surrounding urban areas, and the lack of undeveloped open space, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Based on the lack of suitable habitat on the Project Site, it is unlikely any special status species listed by the California Department of Fish and Wildlife¹¹ or by the U.S. Fish and Wildlife Service¹² would be present on-site. Furthermore, no riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area^{13,14} and the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County of Los Angeles.^{15,16} No water bodies or federally protected wetlands as

⁹ SCAQMD, *Visible Emissions, Public Nuisance, and Fugitive Dust*, www.aqmd.gov/home/rules-compliance/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed March 25, 2020.

¹⁰ SCAQMD, *Rule 402, Nuisance*, adopted May 7, 1976.

¹¹ California Department of Fish and Wildlife, *California Natural Diversity Database, Special Animals List*, November 2018.

¹² United States Fish and Wildlife Service, *ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California*, <https://ecos.fws.gov/ecp0/reports/species-listed-by-state-report?state=CA&status=listed>, accessed April 9, 2019.

¹³ City of Los Angeles Department of City Planning, *ZIMAS, Parcel Profile Report for APN 4334009161*, <http://zimas.lacity.org/>, accessed March 25, 2020.

¹⁴ United States Environmental Protection Agency, *NEPAssist*, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, accessed March 25, 2020.

¹⁵ City of Los Angeles, *Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4*.

defined by Section 404 of the Clean Water Act exist on the Project Site or in the immediate vicinity.¹⁷ No Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.¹⁸

The areas surrounding the Project Site are fully developed, and there are no large expanses of undeveloped open space within and surrounding the Project Site that provide linkages to natural open space areas that may serve as wildlife corridors. Nevertheless, the existing trees on-site and along the perimeter could potentially provide nesting sites for migratory birds. However, the Project 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. Compliance with the MBTA would ensure that the impact would be less than significant.

None of the trees within the Project Site and along San Vicente Boulevard and Burton Way are species that are protected under the Protected Tree Ordinance. 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 and the one street tree to be removed would be replaced on a 2:1 basis. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources.

e. Cultural Resources

If human remains were discovered during construction of the Project, work in the immediate vicinity of the construction area would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e). Due to the low potential that any human remains are located on the Project Site, and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, the Project's impact related to human remains would be less than significant.

¹⁶ *Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.*

¹⁷ *United States Environmental Protection Agency, NEPAassist, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, accessed March 25, 2020.*

¹⁸ *California Department of Fish and Wildlife, California Regional Conservation Plans, October 2017.*

f. Geology and Soils

Based on the Soils and Geology Report, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, or within a City-designated Fault Rupture Study Area. According to the Soils and Geology Report, the closest active fault is the Santa Monica Fault, located approximately 0.26 mile west of the Project Site.¹⁹ As such, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. The Project also would not involve mining operations that require deep excavations thousands of feet into the earth, or boring of large areas, which could create unstable seismic conditions or stresses in the Earth's crust. Therefore, the Project would not directly or indirectly cause potential substantial adverse effects involving the rupture of a known earthquake fault.

As noted above, no active faults are known to pass directly beneath the Project Site. The closest active fault is the Santa Monica Fault, located approximately 0.26 miles west of the Project Site. According to the Soils and Geology Report, the Santa Monica Fault is an active feature capable of generating future earthquakes. A maximum moment magnitude of 7.4 is estimated for the Santa Monica Fault. However, state and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. Specifically, the State and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the City's General Plan Safety Element, and the Los Angeles Building Code. Through compliance with regulatory requirements and site-specific geotechnical recommendations contained in a final design-level geotechnical engineering report, the Project would not directly or indirectly cause potential substantial adverse effects involving strong seismic ground shaking.

Both the City and the State of California classify the Project Site as part of a potentially liquefiable area^{20,21} and, as a result, a site-specific liquefaction analysis was

¹⁹ *The City of Los Angeles Department of City Planning's ZIMAS states that the fault nearest to the Project Site is the Hollywood Fault, which is located approximately 2.28 kilometers or 1.42 miles from the Project Site. However, as the Santa Monica Fault has been more recently labeled as an active fault, information from ZIMAS may be considered outdated. As identified on page 28 of the Soils and Geology Report and based on the California Geological Survey for the Beverly Hills Quadrangle dated 1/11/18, the Santa Monica Fault is the closest active fault to the Project Site. Furthermore, ZIMAS likely measures distances from faults based on traces shown on two-dimensional maps, whereas the California Geological Survey measures distances more accurately based on three-dimensional mapping.*

²⁰ *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 4334009161, <http://zimas.lacity.org/>, accessed March 25, 2020.*

performed, as described in the Soils and Geology Report. The results of the liquefaction analysis conducted at the Project Site indicate that some soil layers underlying the Project Site have a plasticity index greater than 18. Therefore, these soils are not considered prone to liquefaction. The site-specific liquefaction analysis included in the Soils and Geology Report identified two potentially liquefiable soil layers. These layers were observed between a depth of 10 feet and 17.5 feet, and between a depth of 22.5 feet and 27.5 feet. However, based on the anticipated depth of excavation for the proposed subterranean parking structure of approximately 72.5 feet, these soil layers are expected to be excavated during construction of the proposed subterranean parking structure. Therefore, based on these considerations, the Project would not directly or indirectly cause potential substantial adverse effects involving seismic-related ground failure, including liquefaction. As such, the impact would be less than significant.

The Project Site and surrounding area are fully developed and generally characterized by flat topography. In addition, the Project Site is not located in a landslide area as mapped by the State²² nor is the Project Site mapped as a landslide area by the City.^{23,24} All required excavations are expected to be sloped or properly shored in accordance with the applicable provisions of the City of Los Angeles Building Code. Upon buildout of the Project, the existing topography of the Project Site would not be substantially altered. Specifically, the Project Site would remain relatively flat and would not cause landslides. Therefore, the Project would not directly or indirectly cause potential substantial adverse effects involving landslides.

Development of the Project would require grading, excavation and other construction activities that have the potential to disturb existing soils underneath the Project Site and expose these soils to rainfall and wind during construction, thereby potentially resulting in soil erosion. This potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities. Specifically, all grading activities would require grading permits from LADBS, which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading,

²¹ *State of California, California Geological Survey, Seismic Hazard Zones. Beverly Hills Quadrangle, March 25, 1999.*

²² *State of California, California Geological Survey, Seismic Hazard Zones. Beverly Hills Quadrangle, March 25, 1999.*

²³ *Los Angeles General Plan Safety Element, November 1996, Exhibit C, Landslide Inventory & Hillside Areas, p. 51.*

²⁴ *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 4334009161, <http://zimas.lacity.org/>, accessed March 25, 2020.*

excavations, and fills. Furthermore, the Project would be required to comply with the City's Low Impact Development (LID) Ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Regarding soil erosion during Project operations, the potential would be negligible since the Project Site would mostly remain fully developed. Therefore, with compliance with applicable regulatory requirements, the Project's impact related to soil erosion or the loss of topsoil would be less than significant.

With respect to unstable geologic units, as discussed above, impacts with respect to landslides and liquefaction would be less than significant. Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the rapid and intensive withdrawal of subterranean fluids such as groundwater or oil. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring, or is planned at the Project Site. In addition, based on the Soils and Geology Report, the Site is not located within a zone on known subsidence due to oil or other fluid withdrawal. Therefore, there is no potential for ground subsidence due to withdrawal of fluid or gas at the Project Site. Thus, the Project's impact related to subsidence would be less than significant. Additionally, soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events. According to the Soils and Geology Report, the soils underlying the Project Site are not considered prone to hydroconsolidation (also known as soil collapse). Therefore, the Project's impact related to collapse would be less than significant.

Based on the Soils and Geology Report, on-site geologic materials are in the very low to very high expansion range. Specifically, the upper soils were found to have a very high expansion index while soils below a depth of 12.5 feet were observed to have a very low to low expansion index. As previously discussed, the Project would involve excavations to a depth of approximately 72.5 feet. As such, the upper soils with a very high expansion index would be removed as part of the Project. In addition, the Project would be designed in accordance with regulations set forth by the LABC, which would address specific requirements of sites with expansive soils. Therefore, 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. Thus, with compliance with existing regulatory requirements, the Project would not create substantial direct or indirect risks to life or property due to expansive soils.

The Project Site is located within a community served by existing sewage infrastructure. The Project's wastewater demand would be accommodated by connections to the existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems. No impact would occur.

A paleontological records search conducted by the Natural History Museum of Los Angeles County for the Project Site included in Appendix IS-4 to the Initial Study indicates there are no previously encountered fossil vertebrate finds located within the Project Site. However, the Project would include grading to a maximum depth of approximately 72.5 feet would occur within the Project Site in order to develop the Project. Thus, the possibility exists that paleontological artifacts that were not recovered during prior construction or other human activity may be present. Pursuant to the City's Condition of Approval for an Inadvertent Discovery, in the event that any prehistoric subsurface cultural resources are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the Applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. Therefore, with compliance with City's Condition of Approval for an Inadvertent Discovery with regard to paleontological resources, the Project's impact on paleontological resources would be less than significant.

There are no distinct and prominent geologic or topographic features (i.e., hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands) on the Project Site or vicinity. Therefore, the Project would not destroy any distinct and prominent geologic or topographic features. No impact related to unique geologic features would occur.

g. Hazards and Hazardous Materials

The Project would not involve the routine transport of hazardous materials to and from the Project Site. During demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be routinely used on the Project Site through the duration of construction. While some hazardous materials used during construction could require disposal, such activity would occur only for the duration of construction and would cease upon completion of the Project. As such, construction of the Project would not involve the routine disposal of hazardous materials. Notwithstanding, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use.

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in residential and church uses, including cleaning products, paints, and those used for maintenance of landscaping and pools. Such use would be consistent with that currently occurring on the Project Site and at other nearby developments. In addition, 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. Given the type of development proposed, operation of the Project would not involve the routine transport of hazardous materials to and from the Project Site.

There are no schools within one-quarter mile of the Project Site. The nearest school to the Project Site is the Temple Emanuel of Beverly Hills, located approximately 0.8 miles west of the Project Site at 8844 Burton Way. As discussed above, Project construction would have the potential to emit and would involve the handling of hazardous materials. However, the handling and disposal of hazardous materials and wastes would occur in compliance with all applicable federal, State, and local requirements. Additionally, the Project operation would involve the limited use of hazardous materials typically used in the maintenance of residential, office, and commercial uses (e.g., cleaning solutions, solvents, pesticides for landscaping, painting supplies, and petroleum products). However, all potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers' specifications and in compliance with applicable federal, state, and local regulations. As such, the use of such materials would not create a significant hazard to nearby schools. Therefore, with compliance with relevant regulations and requirements, the Project would not create a significant hazard to nearby schools, and the impact regarding the Project's emission or handling of hazardous materials and wastes within one-quarter mile of a school would be less than significant.

According to the Phase I ESA, the Project Site is listed on the Environmental Database Resources Historic Gas Stations (EDR Hist Auto) database based on the Project Site's identification as a former automotive repair shop in 1999 and a historical gas station between 2001 and 2003. However, that is incorrect because the Project Site has been used exclusively for church purposes since the late 1930s. In addition, based on a review of building permits, city directories and aerial photographs, the Phase I ESA found no indication that the Project Site operated as a gas station between 2001 and 2003. Furthermore, the Project Site was not identified on the City of Los Angeles Fire Department's (LAFD) list of active and inactive aboveground and underground storage tanks and hazardous materials inventories. As such, the listing is in error and not considered to represent the Project Site. Therefore, the Project would not create a significant hazard to the public or the environment from the Project Site's location on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

The Project Site is not located within an airport land use plan or within two miles of an airport. The closest airports to the Project Site are Santa Monica Municipal Airport, located approximately 7.4 miles southwest of the Project Site and Los Angeles International Airport, located approximately 9.5 miles south of the Project Site. Given the distance between the Project Site and the nearest airports, the Project would not have the potential to result in a safety hazard or excessive noise for people residing or working in the area of the Project Site. Therefore, no impact would occur.

According to the Safety Element of the City's General Plan, none of the streets directly adjacent to the Project Site are designated disaster routes. The nearest designated disaster route to the Project Site is La Cienega Boulevard, which is located approximately 0.2 miles east of the Project Site. While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project does not require the permanent closure of any local public streets, and vehicular access to the Project Site would be provided from the publicly-accessible alley that abuts the Project Site to the north, as well as a drop-off area along Burton Way. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. As a result, the Project would not impede emergency access within the Project Site vicinity or cause an impediment along the City's designated disaster routes such that it would impair the implementation of the City's emergency response plan. Therefore, the Project's impact related to the implementation of the City's 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,²⁵ nor is it located within a City-designated fire buffer zone.²⁶ Therefore, the Project would not exacerbate conditions that would subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires.

²⁵ *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 4334009161, <http://zimas.lacity.org/>, accessed March 25, 2020. 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.*

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

h. Hydrology and Water Quality

During Project construction, 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. As Project construction would disturb less than one acre of soil, the Project would not be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. However, the Project would be required to implement Best Management Practices (BMPs) as part of the City's grading permit requirements. BMPs would include, but would not necessarily be limited to, erosion control, sediment control, non-stormwater management, and materials management BMPs (e.g., 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 (LAMC Chapter IX, Division 70), such as the preparation of an Erosion Control Plan, to reduce the effects of sedimentation and erosion.

Project construction activities are expected to encounter groundwater which could require dewatering. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all relevant NPDES requirements related to construction and discharges from dewatering operations. Furthermore, if dewatering is required, the treatment and disposal of the dewatered water would occur in accordance with the Los Angeles Regional Water Quality Control Board (LARWQCB) Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.

As is typical of most urban existing uses and proposed developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. The implementation of BMPs required by the City's LID Ordinance would target pollutants that could potentially be carried in stormwater runoff. Furthermore, operation of the Project would not result in discharges that would cause regulatory standards to be violated. The existing Project Site is 86.2-percent impervious and consists of buildings, paved surface lots, and landscape areas. Implementation of the Project would slightly increase the impervious surfaces to 86.8 percent. As discussed in the Water Resources Technical Report, the existing Project Site was developed prior to the enforcement of stormwater quality BMP design, implementation, and maintenance, and the Project Site does not include BMPs or measures to treat stormwater runoff. As such, stormwater currently flows from the Project Site without any treatment. However, the Project includes the installation of a capture and use and/or biofiltration system, which would control

stormwater runoff with no increase in runoff resulting from the Project. Therefore, with the incorporation of such LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. The impact on surface water quality during operation of the Project would be less than significant.

With respect to groundwater, the Phase I ESA prepared by Citadel documented that groundwater beneath the Project Site had been impacted by dry cleaning chemicals from the former Merry Go Round Cleaner that exceed maximum contaminant levels regulatory thresholds for drinking water. However, as previously discussed, if dewatering is required, the treatment and disposal of the dewatered water would occur in accordance with the LARWQCB Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. Therefore, Project construction could potentially improve the existing condition by removing impacted groundwater. In addition, the proposed construction activities would be typical of a residential project and would not involve activities that could further impact the underlying groundwater quality.

During operation, surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner, thereby resulting in little threat to groundwater. Other types of risks such as leaking underground storage tanks have a greater potential to affect groundwater. However, the Project would not include any new USTs that would have the potential to expose groundwater to contaminants. In addition, while the Project would introduce more density and an additional land use (residential) to the Project Site which would slightly increase the use of potentially hazardous materials as described above, the Project would comply with all applicable existing regulations that would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. The Project also does not include the installation or operation of water wells, or any extraction or recharge system near the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well, or a spreading ground facility.

In addition, the Project includes the installation of a capture and use and/or biofiltration system as a means of treatment and disposal of the volume of water produced by the greater of the 85th percentile storm or the 0.75-inch storm event, which would allow for treatment of the on-site stormwater. Therefore, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade ground water quality. The Project's potential impact on groundwater quality during operation would be less than significant.

As discussed above, temporary dewatering operations are expected based on the groundwater encountered at 18 feet below the existing grade. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations. Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.

Regarding groundwater recharge, the existing Project Site is mostly impervious with approximately 86.2-percent impervious surfaces. Therefore, there is currently low groundwater recharge potential. While operation of the Project would slightly increase the impervious areas of the site from 86.2 percent to 86.8 percent, the underground footprint of the Project's improvements and landscaping would span property line to property line, and therefore the groundwater recharge potential would remain minimal. As stated above, the volume greater than the first flush of stormwater, which bypasses the BMP systems, would discharge to an approved discharge point in the public right-of-way and would not result in infiltration of a large amount of rainfall that would affect groundwater hydrology, including the direction of groundwater flow. As such, the Project would not interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the Coastal Plain Groundwater Basin.

Construction 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. Also, exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as discussed above, 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. Thus, through compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion or siltation on-site or off-site. As such, construction-related impacts to hydrology would be less than significant.

During operation, similar to existing conditions, there would be a limited potential for erosion or siltation to occur from exposed soils or large expanses of pervious areas. Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion or siltation on-site or off-site would occur.

While there are no streams or rivers within or immediately surrounding the Project Site, construction activities have the potential to temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. As discussed above, 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. Thus, through compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in flooding on-site or off-site.

During operation, consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of capture and use and/or biofiltration system BMPs as established by the LID Manual. The installed BMP systems would be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. Therefore, while the Project would slightly increase impervious surfaces compared to existing conditions, with implementation of BMPs the Project would not increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site.

Currently, stormwater runoff from the Project Site is conveyed by sheet flow towards the south and is collected in catch basins either on Burton Way or South San Vicente Boulevard. The Project would include the installation of building roof drain downspouts, area drains, and planter drains to collect roof and site runoff. The Project would also direct stormwater away from buildings through a series of storm drain pipes. Furthermore, based on the volumetric flow rate analysis provided in the Water Resources Technical Report, a comparison of the pre- and post-Project peak flow rate indicated that there would be no increase in stormwater runoff. 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.

The Project Site is located within a 0.2-percent annual chance floodplain area, as identified in Zone X (shaded) in the Flood Insurance Rate Maps from the Federal Emergency Management Agency (FEMA).^{27,28} In addition to the low risk of flooding, the

²⁷ Based on FIRM Number 06037C1585F, effective on 09/26/2008.

²⁸ Shaded Zone X depicts areas of 0.2-percent annual chance flood; areas of one percent annual chance flood with average depths of less than one foot or with drainage areas less than 1 square mile; and areas protected by levees from one percent annual chance flood.

Project would implement a capture and use and/or biofiltration system BMPs and a stormwater conveyance system. Thus, the Project would not alter the existing drainage pattern of the Project Site in a manner that would impede or redirect flood flows.

According to the City of Los Angeles General Plan Safety Element, the Project Site is not located in an area potentially impacted by a tsunami but is located in the potential dam inundation area of Lower Franklin Reservoir.²⁹ However, as described in the Water Resources Technical Report prepared for the Project, in the event of a breach, the released water would significantly dissipate by the time it reached the Project Site.³⁰ Moreover, the risk of a breach is very low. Dam safety regulations are the primary means of reducing damage or injury due to inundation occurring from dam failure. For these reasons, the risk of release of pollutants due to project flooding from inundation by a seiche or dam failure is considered very low. Moreover, even if water from the reservoir reached the Project Site, given the relatively small size of the Project Site and the contemplated new residential use, any pollutants released are not anticipated to be substantial.

As described above, based on observation of existing conditions, stormwater currently discharges from the Project Site without treatment or on-site detention. Thus, the Project's implementation of capture and use and/or biofiltration system BMPs would minimize the release of anticipated and potential pollutants generated by the Project (e.g., sediment, nutrients, pesticides, metals, pathogens, and oil and grease). As the Project would only slightly increase the amount of impervious area from 86.2 to 86.8 percent, implementation of the LID BMP measures on the Project Site would result in an improvement in surface water quality runoff when compared to existing conditions. As such, the Project would not conflict with or obstruct any water quality control plans, and impacts would be less than significant.

i. Land Use and Planning

Consistent with existing and approved development along the San Vicente Boulevard corridor, the Project includes the development of 153 apartment units (including 17 Very Low Income units) in a new residential building, the rehabilitation and limited alteration of the existing cathedral and the replacement of the existing ancillary church buildings with a new ancillary church building. All proposed development would occur within the boundaries of the Project Site as it currently exists, and the Project does not require the vacation of any surrounding streets adjacent to the Project Site. In addition, the Project does not involve the construction of any large infrastructure within or surrounding

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

³⁰ *Beverly Hills General Plan Technical Background Report, Chapter 6, Community Health and Safety, p. 6-29.*

the Project Site that could physically divide the surrounding community. Therefore, the Project would not physically divide an established community. The Project's impact 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. In addition, 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.^{31,32,33} The Project Site is located within a City-designated oil field or oil drilling area.³⁴ According to the California Division of Oil, Gas and Geothermal Resources, the Project Site is also located within the limits of the San Vicente and Salt Lake Oil Fields.³⁵ However, the nearest oil well is located approximately 200 feet northeast of the Project Site and is currently inactive and plugged. Moreover, the Project Site does not currently include any oil drilling activities. Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur.

k. Noise

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

l. Population and Housing

Development of up to 153 units would result in a net increase of approximately 369 residents.³⁶ The 369 new residents generated by the Project would represent

³¹ *City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.*

³² *State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.*

³³ *City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.*

³⁴ *City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit E, p. 55.*

³⁵ *California Department of Conservation, Geologic Energy Management Division, Well Finder, <https://maps.conservation.ca.gov/doggr/wellfinder/#close>, accessed March 2, 2021.*

³⁶ *Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City (Footnote continued on next page)*

approximately 0.27 percent of the population growth forecasted in SCAG's 2016–2040 RTP/SCS for the City of Los Angeles Subregion between 2019 and 2024. The Project's 153 new residential units would constitute up to approximately 0.23 percent of the housing growth forecasted in SCAG's 2016–2040 RTP/SCS between 2019 and 2024 for the City of Los Angeles Subregion. Therefore, the Project's residents and households would be well within SCAG's population and housing projections for the Subregion.

According to the SCAG 2020-2045 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2019 was approximately 4,036,475 persons.³⁷ In 2024, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,172,886 persons.³⁸ Thus, the 369 estimated net new residents generated by the Project would represent approximately 0.27 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2019 and 2024. The Project's 153 new residential units would constitute up to approximately 0.21 percent of the housing growth forecasted in SCAG's 2020-2045 RTP/SCS between 2019 and 2024 for the City of Los Angeles Subregion. Therefore, the Project's residents and households would be well within SCAG's population and housing projections for the Subregion.

The new residential use would not increase the number of church employees on the Project Site. Moreover, the cathedral rehabilitation and replacement of existing ancillary church buildings with a new church building would not increase the number of church employees on the Project Site. Therefore, the Project would not result in a substantial number of new church employees on the Project Site that could generate an associated indirect demand for new housing in the area and induce substantial population growth.

As no permanent housing currently exists on the Project Site, the development of the Project would not displace any existing housing or cause the displacement of any persons or require the construction of housing elsewhere.

Therefore, based on the above, impacts related to population and housing would be less than significant.

Planning, June 12, 2020. The Initial Study prepared for the Project and included as Appendix A to this Draft EIR used a rate of 2.6 persons per unit based on the previous 5-year estimate from the American Community Survey. The Department of City Planning subsequently confirmed the 2.41 average was the factor to be used.

³⁷ Based on a linear interpolation of 2016–2045 data.

³⁸ Based on a linear interpolation of 2016–2045 data.

m. Public Services

(1) Schools

The Project includes the construction of 153 residential units. Based on Los Angeles Unified School District (LAUSD) Student Generation rates, the Project would result in approximately 35 elementary students, 9 middle school students, and 20 high school students in the project area, for a total of approximately 64 students.³⁹ As such, the Project would create new demand for capacity at the LAUSD schools that serve the Project Site. It should be noted, however, that this analysis does not include LAUSD options that would allow students generated by the Project to enroll at other LAUSD schools located away from their home attendance area, or students who may enroll in private schools or participate in home-schooling. In addition, this analysis does not account for Project residents, who may already reside in the school attendance boundaries and would move to the Project Site. In addition, pursuant to Senate Bill (SB) 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 addresses Project-related school impacts. Therefore, payment of the applicable development school fees to LAUSD would offset the potential impact of additional student enrollment at schools serving the Project Site and impacts would be less than significant.

(2) Parks

Based on a household size factor of 2.41 persons per household, development of the proposed 153 residential units would result in an increase of approximately 369 residents.⁴⁰ As discussed in Section II, Project Description, of this Draft EIR, the Project includes a total of approximately 16,800 square feet of usable open space amenities in and around the residential building. Specifically, Level 4 of the building includes 9,200 square feet of common open space, including a 676-square-foot indoor fitness room and 1,266-square-foot recreation center, a 5,242-square-foot outdoor recreation deck, and a 2,016-square-foot pool deck. Outdoor common open space amenities also include barbecue stations, a spa, pool, firepit areas, and informal seating. The Project also includes private open space amenities, including four approximately 100-

³⁹ Los Angeles Unified School District, 2020 Developer Fee Justification Study, March 2020, Table 3.

⁴⁰ Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020. The Initial Study prepared for the Project and included as Appendix A to this Draft EIR used a rate of 2.6 persons per unit based on the previous 5-year estimate from the American Community Survey. The Department of City Planning subsequently confirmed the 2.41 average was the factor to be used.

square-foot patios for the ground-floor residences and 144 approximately 50-square-foot balconies for the residences on all other levels of the residential building.

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 often utilize the on-site open space and common areas to meet their recreational needs. While the Project's residents would be expected to use off-site public parks and recreational facilities to some degree, the Project would not be expected to generate a substantial increase in the demand for parks or recreational facilities.

In any event, the Applicant would satisfy the applicable requirements of the LAMC Section 12.33 by paying the applicable in-lieu park fees for the residential component of the Project and/or dedicating park land. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks or the need for new or physically altered parks. This impact would be less than significant.

n. Transportation

The Project's design does not include hazardous geometric design features (e.g., sharp curves or dangerous intersections). The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections, and the development of the Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. In addition, the proposed uses would be consistent with the surrounding uses (i.e., residential and commercial) and would not introduce hazards due to incompatible uses. Thus, no potential impacts related to a substantial increase in hazards due to a geometric design feature or incompatible uses would occur.

While it is expected that the majority of construction activities for the Project would primarily be confined on-site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with the Construction Traffic Management (CTM) Plan that would be implemented pursuant to Project Design Feature TR-PDF-1 to ensure adequate circulation and emergency access. With regard to operation, the Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. The Project does not propose the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from San Vicente Boulevard and Burton Way. In addition, compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection

for new construction Projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. Therefore, the Project would not result in inadequate emergency access within the project vicinity or cause an impediment along the City's designated disaster routes.

Based on comments received during the NOP public review period, Section IV.I, Transportation, of this Draft EIR, also included an analysis of alley operations. As discussed therein, the Project would not materially change traffic operations on the alley, specifically as it relates to inbound and outbound traffic movements associated with the Westbury Terrace residential development. Therefore, the Project would not result in a significant and adverse impact on traffic operations in the alley adjacent to the Project Site, and the impact would, therefore, be less than significant.

o. Utilities and Service Systems

(1) Stormwater

With regard to storm water drainage, as discussed above in, Hydrology and Water Quality, implementation of the Project would not increase stormwater flow from the Project Site such that there would be an increase in the rate or amount of surface runoff. Impacts would be less than significant.

(2) Wastewater

Wastewater generated by the Project would be conveyed by the existing wastewater conveyance systems in the vicinity of the Project Site for treatment at the Hyperion Water Reclamation Plant (HWRP). The HWRP has a capacity of 450 million gallons per day and current wastewater flow levels are at 275 million gallons per day,⁴¹ resulting in a remaining available capacity of approximately 175 million gallons per day. Based on sewage generation factors established by the Los Angeles Bureau of Sanitation (LASAN), the existing church uses are estimated to generate a maximum wastewater flow of approximately 3,524 gallons per day. Based on the Wastewater Report prepared for the Project (included in Appendix IS-7 to the Initial Study), the Project would generate a maximum wastewater flow of approximately 39,648 gallons per day upon completion. After accounting for the existing total Project Site wastewater generation, the Project would result in a net increase in maximum wastewater flows of approximately 36,124 gallons per day. The net increase in maximum wastewater flow of 36,124 gallons per day represents

⁴¹ City of Los Angeles Department of Public Works Bureau of Sanitation, *What We Do, Water Reclamation Plants, Hyperion Water Reclamation Plant*, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=v426zn651_4&_afrcLoop=29208833112385926#!, accessed March 2, 2021.

approximately 0.02 percent of the remaining available capacity of 175 million gallons per day at the HWRP. Therefore, the Project-generated wastewater would be accommodated by the remaining available capacity of the HWRP.

Sewer service for the Project would be provided utilizing existing on-site sewer connections to the existing sewer mains adjacent to the Project Site. As discussed in the Wastewater Report, there is a 15-inch sewer line in the alley between Holt Avenue and San Vicente Boulevard, with a capacity of 894,973 gallons per day. Based on the Sewer Capacity Availability Request (SCAR) prepared for the Project, provided in Appendix IS-7 to the Initial Study, the existing 15-inch sewer line would have adequate capacity to accommodate the Project. Specifically, the City has analyzed the Project's demand in conjunction with existing conditions and forecasted growth and has approved the Project to discharge up to 39,648 gallons per day, which is consistent with the Project's maximum wastewater flow and exceeds the Project's net increase in sewage generation of approximately 36,124 gallons per day. Should the City determine that additional sewer connections and sewer infrastructure capacity is needed to meet the demands of the Project, the Applicant would implement such improvements in consultation with the City.

Based on the above, the Project's impact on wastewater treatment facilities would be less than significant impact.

(3) Telecommunications Facilities

The Project would require construction of new on-site telecommunications facilities and potential upgrades and/or relocation of existing telecommunications facilities to serve the new project buildings. The installation of telecommunications facility infrastructure would primarily involve trenching in order to place the lines below surface of the Project Site. However, the Applicant would prepare a CTM Plan pursuant to Project Design Feature TR-PDF-1 to ensure safe pedestrian access to land uses in the vicinity of the Project Site, as well as emergency vehicle access and safe vehicle travel in general, to reduce any temporary pedestrian and traffic impacts occurring as a result of construction activities. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration (i.e., months) and would cease when installation is complete. Installation of new telecommunications infrastructure would primarily take place on-site, with minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing energy and telecommunications lines would be coordinated with service providers. Operation of the Project does not require or result in the relocation or construction of new or expanded telecommunications facilities. As such, the operation of the Project would not require or result in the relocation or construction of new or expanded telecommunication facilities which could cause any significant environmental effect.

(4) Solid Waste

The Project Site is currently developed with a cathedral, three ancillary church buildings, and a surface parking lot. Construction of the Project includes the development of 153 residential units, a rehabilitated cathedral, and a new ancillary church building that would replace the existing ancillary church buildings. Overall, the Project includes a net increase of approximately 160,862 square feet of floor area upon buildout. Pursuant to the requirements of SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills serving the County. After accounting for mandatory recycling, the Project would generate approximately 336 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 341 tons of solid waste 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 (AB) 341, which requires California commercial enterprises and public entities that generate 4 cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's recycLA franchising system, which is expected to result in a reduction of landfill disposal Citywide, with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.^{42,43} 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.⁴⁴

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's Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.⁴⁵ The

⁴² *The recycLA program divides the City into 11 zones and designates a waste collection company for each zone. Source: LA Sanitation, recycLA, Your Plan.*

⁴³ *City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAN 2019.*

⁴⁴ $(341 \text{ tons per year} / 149.77 \text{ million tons per year}) \times 100 = \sim 0.0002\%$

⁴⁵ *Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.*

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 management and reduction statutes and regulations related to solid waste, the impact would be less than significant.

p. Wildfire

The Project Site is located in an urbanized area, and 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,⁴⁶ nor is it located within a City-designated fire buffer zone.⁴⁷ Therefore, the Project Site is not located in or near state responsibility areas or lands classified as Very High Fire Hazard Severity Zones. No impact regarding wildfire risks would occur.

⁴⁶ *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 4334009161, <http://zimas.lacity.org/>, accessed March 25, 2020. 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.*

⁴⁷ *City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.*