

VI. Other CEQA Considerations

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1. Significant Unavoidable Impacts

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

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

As evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, and summarized below, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with regard to operational regional air pollutant emissions, regional concurrent construction and operational air pollutant emissions, historic resources, and on-site and off-site noise and vibration (human annoyance) during construction. Implementation of the Project would also result in significant cumulative impacts that cannot be feasibly mitigated with regard to operational regional air pollutant emissions, concurrent construction and operational regional air pollutant emissions, on-site and off-site construction noise, and on-site and off-site vibration (human annoyance) during construction.

a. Operational Regional Emissions

Regional air pollutant emissions resulting from vehicle trips to and from the Project Site during operation of the Project would exceed SCAQMD's daily regional operational threshold for NO_x. Therefore, regional operational emissions resulting from the Project would result in a significant impact. While the Project is a transit-oriented development located within a transit priority area and would include a Transportation Demand Management (TDM) program to reduce vehicle trips, and while feasible mitigation measures have been identified to reduce the Project's operational regional emissions of criteria pollutants as much as possible, no feasible mitigation measures are available that would reduce operational regional nitrogen oxides (NO_x) emissions to a less than significant level. According to SCAQMD, if an individual project results in air emissions of

criteria pollutants that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase of these criteria pollutants.¹ As operational emissions exceeded SCAQMD's regional significance threshold for NO_x, the emissions of non-attainment pollutants and precursors generated by project operation would be cumulatively considerable.

b. Regional Concurrent Construction and Operational Emissions

Portions of the Project Site would be completed and occupied while construction of the later Project components would be ongoing. Based on a review of the Project, the reasonably anticipated maximum concurrent emissions are expected to occur in Year 2025 during operation of East and West Lots and Blocks 0, 7, and 8, and construction of Blocks 5/6. This development scenario results in the maximum amount of concurrent construction and operational activity in terms of square footage developed on the Project Site and resultant daily vehicle trips. It also assumes maximum daily activity (i.e., peak on-site heavy-duty construction equipment usage and haul truck trips) occurring during construction of Blocks 5/6. As such, regional emissions of NO_x during concurrent construction and operation would exceed the SCAQMD regional operational threshold. Therefore, regional concurrent construction and operational emissions of NO_x resulting from the Project would result in a significant impact. Furthermore, while all feasible mitigation measures would be implemented (refer to Mitigation Measure AIR-MM-1 and AIR-MM-2 in Section IV.A, Air Quality, of this Draft EIR), impacts would remain significant and unavoidable. Additionally, based on SCAQMD guidance, individual concurrent construction and operational projects that exceed SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the South Coast Air Basin is in non-attainment.² Therefore, the Project's contribution to cumulative air quality impacts due to regional NO_x emissions would be cumulatively considerable.

c. Historic Resources

The Project would have a direct impact on the location, setting, and association of the Lankershim Depot, which is proposed to be relocated approximately 44 feet to the west and 2.5 feet to the south to accommodate expansion and consolidation of transit services, specifically a new portal to the Metro North Hollywood Station. Mitigation Measures

¹ SCAQMD, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, August 2003, Appendix D.

² SCAQMD, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, August 2003, Appendix D.

CUL-MM-1, CUL-MM-2, and NOI-MM-2 discussed in Sections IV.B, Cultural Resources, and IV.H, Noise, of this Draft EIR, respectively, would be implemented to reduce direct impacts to the Lankershim Depot to the extent feasible. However, even with implementation of the mitigation measures, impacts to the Lankershim Depot would be significant and unavoidable, as the relationship of the Depot to the intersection of Lankershim and Chandler Boulevards would be lost.

d. On-Site Construction Noise

As discussed in Section IV.H, Noise, of this Draft EIR, implementation of Mitigation Measure NOI-MM-1 provided therein would reduce the Project's construction noise levels to the extent technologically feasible. Specifically, implementation of Mitigation Measure NOI-MM-1 (installation of temporary sound barriers) would reduce the noise generated by on-site construction activities at the off-site sensitive uses by up to 15 dBA at receptor locations R1, R2, R7, R9, R10, R13, and R14, by up to 13 dBA at receptor locations R6 and R11, by up to 12 dBA at receptor location R3, by up to 11 dBA at receptor location R8, and by up to 9 dBA at receptor location R5. Mitigation Measure NOI-MM-1 would reduce the construction noise impacts at receptor locations R6 and R8 to a less-than-significant level. However, the temporary noise barrier would only be effective at the ground level of receptor locations R1, R2, R3, R5, R7, R11, and R13 because the barriers block line-of-sight to these receptors, and thereby attenuate noise levels only at grade level. The residential uses at these receptors are contained in multi-story mid-rise buildings. The line-of-sight from the upper floors at these receptors to the Project Site would remain unobstructed because it is not technologically feasible to construct temporary noise barriers, including moveable barriers, that would extend to the height of the buildings at these receptor locations.

In addition, noise attenuation from temporary construction noise barriers is typically limited to a maximum 15-dBA noise reduction. Other mitigation measures to reduce noise include reducing the number of construction equipment and providing a buffer zone, were evaluated. However, these measures were determined to be infeasible. Specifically, construction noise levels are dependent on the number of construction equipment in use. Typically, a reduction of 50 percent in the number of construction equipment pieces would reduce the noise levels by 2 to 3 dBA (depending on the equipment type and relative distance). The noise impacts would still exceed the significance criteria with a 50-percent reduction in construction equipment because the exceedances are greater than 3 dBA at receptor locations R9, R10, R13, and R14. Thus, reducing the construction equipment utilized by the Project by 50 percent would not reduce the impact to a less than significant level and would increase the number of days sensitive receptors would be impacted by construction activities and, therefore, would only prolong the duration of the impact. Construction noise levels can also be reduced by providing an additional buffer zone between the receptor and the construction equipment. Noise levels from construction

equipment would attenuate approximately 6 dBA per doubling of distance. However, it would not be technically feasible to provide a greater buffer zone, as the construction activities (e.g., site demolition) would be up to the property line.

Therefore, there are no other technically feasible mitigation measures that could be implemented to reduce the temporary noise impacts from on-site construction. Construction noise impacts at receptor locations R1, R2, R5, R7, R9, R10, R11, R13, and R14 would still exceed the significance thresholds with mitigation measures. Therefore, construction noise impacts associated with on-site noise sources would remain significant and unavoidable.

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 each individual related project and compliance with locally adopted and enforced noise ordinances. Based on the above, there would be potential cumulative noise impacts at the nearby sensitive uses (e.g., residential uses) located in proximity to the Project Site and Off-Site Metro Parking Areas, Related Project Nos. 1, 2, and 5, in the event of concurrent construction activities. It should be noted that the timing of the construction activities for these related projects are uncertain and are beyond the control of the City and the Applicant. Accordingly, it is uncertain if the concurrent construction activities identified above would result in the exceedances identified herein. Nevertheless, this analysis conservatively assumes such exceedances would occur. Therefore, the Project's contribution would be cumulatively considerable, and cumulative noise impacts from on-site construction would be significant.

e. Off-Site Construction Noise

The short-term noise impacts associated with off-site construction traffic would be significant along Burbank Boulevard, Lankershim Boulevard, Cumpston Street, Chandler Boulevard, and Fair Avenue, under Haul Route Option A and along Vineland Avenue, Lankershim Boulevard, Chandler Boulevard, Fair Avenue, Cumpston Street, and Magnolia Boulevards under Haul Route Option B. Conventional mitigation measures, such as providing temporary noise barrier walls to reduce the off-site construction truck traffic noise impacts, would not be technically feasible as the barriers would obstruct the access and visibility to the properties along the anticipated truck route. There are no other technically feasible mitigation measures that could be implemented to reduce this short-term impact. Therefore, construction noise impacts associated with off-site noise sources would remain significant and unavoidable.

Cumulative noise due to construction truck traffic from the Project and other related projects could also increase the ambient noise levels at certain segments along the haul route. As such, the Project's contribution would be cumulatively considerable, and cumulative noise impacts from off-site construction would be significant.

f. On-Site Construction Vibration (Human Annoyance)

As discussed in Section IV.H, Noise, of this Draft EIR, Project-level vibration impacts from on-site construction activities would exceed the 72-VdB human annoyance significance criterion at the residential uses within 80 feet of the Project Site (receptor locations R1, R2, R5, R7, R13, and R14) and the studio use (receptor location R9) during certain phases of construction. Mitigation measures considered to reduce vibration impacts from on-site construction activities with respect to human annoyance included the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise, comparatively). However, wave barriers must be very deep and long to be effective and are not typically used for temporary applications, such as construction.³ In addition, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate ground-borne vibration from the excavation equipment. Furthermore, it would not be technologically feasible to install a wave barrier along the public roadways for the off-site construction vibration impacts. Thus, it is concluded that there are no technically feasible mitigation measures that could be implemented to reduce the temporary vibration impacts from on-site construction associated with human annoyance to a less-than-significant level. Therefore, Project-level vibration impacts from on-site construction activities with respect to human annoyance would remain significant and unavoidable.

With respect to cumulative impacts, Related Project No. 1 is approximately 25 feet from the receptor location R5. Potential vibration impacts associated with Project-related on-site construction activities would be significant with respect to human annoyance at receptor location R5 (the closest sensitive receptor between the Project and Related Project No. 1). Therefore, the ground-borne vibration from Related Project No. 1 to the receptor location R5 would be similar to the Project and would exceed the 72-VdB significance thresholds. Therefore, the Project's contribution to a potential construction vibration impact with respect to human annoyance associated with on-site construction would be cumulatively considerable, and cumulative impacts would be considered significant.

³ Caltrans, *Transportation and Construction Vibration Guidance Manual*, p.41, April 2020.

g. Off-Site Construction Vibration (Human Annoyance)

As evaluated in Section IV.H, Noise, of this Draft EIR, vibration impacts associated with temporary and intermittent vibration from off-site construction activities (i.e., construction trucks traveling along the anticipated truck routes) would be significant with respect to the significance criteria for human annoyance along the roadway segments of Burbank Boulevard, Lankershim Boulevard, Cumpston Street, Fair Avenue, Tujunga Avenue, Colfax Avenue, and Magnolia Boulevard. Furthermore, it would not be technically feasible to install a wave barrier along the public roadways for the off-site construction vibration impacts. Therefore, Project-level vibration impacts from off-site construction activities with respect to human annoyance would remain significant and unavoidable.

With respect to cumulative impacts, as related projects would be anticipated to use similar haul routes as the Project (i.e., Burbank Boulevard, Lankershim Boulevard, Tujunga Avenue, Colfax Avenue, and Magnolia Boulevard), it is anticipated that construction trucks would generate similar vibration levels along the anticipated truck route(s). Therefore, to the extent that other related projects use the same truck route and during the same time as the Project, the Project's contribution to potential cumulative vibration impacts with respect to human annoyance associated with temporary and intermittent vibration from haul trucks traveling along the designated truck route(s) would be cumulatively considerable, and cumulative impacts would be considered significant.

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

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

As discussed in Section II, Project Description, of this Draft EIR, the underlying purpose of the Project is to redevelop the area around the Metro North Hollywood Station with a high-density, mixed-use development, which is transit and pedestrian oriented and provides housing and jobs in the North Hollywood Valley Village Community Plan Area (Community Plan). The underlying purpose and objectives of the Project are closely tied to the goals and objectives of the Community Plan, which supports the objectives and policies of applicable larger-scale regional and local land use plans, including the Southern California Association of Government's (SCAG's) 2020–2045 Regional Transportation

Plan/Sustainability Communities Strategy Connect SoCal (2020–2045 RTP/SCS) and the City’s General Plan.

The Project’s general consistency with the applicable goals set forth in the 2020–2045 RTP/SCS is analyzed in Table 5 of Appendix K of this Draft EIR. As detailed therein, the Project would be generally consistent with the applicable goals set forth in the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the goals of the 2020–2045 RTP/SCS to improve mobility, accessibility, reliability, and travel safety for people and goods as well as reducing GHG emissions by developing new residential, retail, restaurant, and office uses on a Project Site within a designated High Quality Transit Area (HQTAs) and Transit Priority Area (TPA) that is well served by public transit, including the on-site Metro North Hollywood Station which is served by the G (Orange) Line busway and B (Red) Line subway, as well as Metro local bus lines, LADOT Commuter Express, Santa Clarita Transit, and the Burbank Bus. The Project would also provide for the development of diverse housing types in an area that is supported by multiple transportation options by providing 1,527 multi-family residential units, comprised of studio, one-, two-, and three-bedroom units. A total of 311 of these units, representing 20 percent of the total proposed residential units, would be affordable housing. In addition, the Project would provide up to 1,158 bicycle parking spaces for Project uses and up to 166 Metro Bike Hub parking spaces to promote the use of alternative transportation. The Project would also enhance pedestrian activity in the area by providing 87,225 square feet of publicly accessible plazas, with seating and access to the Project’s proposed retail and restaurant uses. New trees and landscaping would also be provided throughout the Project Site. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and walking and biking.

Furthermore, the Project would support the North Hollywood Valley Village Community Plan’s objective to coordinate the development of the North Hollywood area with that of other parts of the City of Los Angeles and the metropolitan area. The Project would introduce 1,527 multi-family residential units, including 311 affordable units, that would provide needed housing in the Community Plan area and support the City’s objective (i.e., Objective 3.b of the Community Plan) and multiple policies in both SCAG’s RTP/SCS and Regional Housing Needs Assessment (RHNA) to provide multiple-dwelling units for those who cannot afford or do not desire to own their own home. The Project would support the City’s objective to make provisions for the housing required to satisfy the varying needs and desires of all economic segments of the Community Plan area by developing new residential and retail, restaurant, and office uses in North Hollywood. The proposed uses would be located in a designated HQTAs and TPA, which would reduce VMT.

Furthermore, the Project would provide a variety of open space areas within the Project Site, supporting the City's objective to encourage open space for recreational uses. Specifically, the Project would provide 211,280 square feet of open space within the Project Site in accordance with the Project's proposed Specific Plan, 87,225 square feet of which would be publicly accessible, privately operated and maintained. The ground-floor open space in Blocks 0 East and 5/6 and surrounding the Metro east portal would offer a publicly-accessible destination and plaza area. Like traditional squares and plazas, seating would be aggregated along the development for dining, shopping, and gathering.

The Project would support the City's objective to make provisions for a circulation system coordinated with land uses and to encourage the expansion and improvement of public transit. Specifically, the Project would promote the use of public transit and reduce VMT by providing a mix of residential, retail, restaurant, and office uses on a Project Site that includes the Metro North Hollywood Station which is served by the G (Orange) Line busway and B (Red) Line subway. The Project also includes enhancements to the G (Orange) Line Terminus property including the consolidation of Metro G (Orange) Line, LADOT Commuter Express, as well as other local and regional bus lines in a single transit center; a Metro Bike Hub; new bus shelters; an employee break room; a security office; architectural and art inspired updates to and reconfiguration of the existing Metro west portal and the addition of a second west portal, which would provide pedestrian connections to the Metro B (Red) Line Station below. The Project would provide up to 3,313 vehicle parking spaces to support Project uses within subterranean and above ground parking areas and up to 1,158 bicycle parking spaces (970 long term and 188 short term) throughout the Project Site in accordance with the Project's proposed Specific Plan.

The Project would support the City's objective (i.e., Objective 8, p. II-3, of the Community Plan) to improve the visual environment of the community and strengthen and enhance its image and identity. Specifically, as discussed above, the Project Site is currently developed with the Metro North Hollywood Station, industrial/warehouse buildings, and surface parking. The Project would replace the existing industrial/warehouse buildings and surface parking on the Project Site with a new, mixed-use development consisting of residential, retail, restaurant, and office uses, along with public and private open space and parking for both Project and Metro uses.

Based on the above, the Project proposes development that is consistent with the overall vision of the City and SCAG to locate supporting and synergistic uses within one site to create sustainable communities and enhance quality of life throughout the City and the region. As such, the Project presents several benefits that override the limited and temporary adverse effects it may have on the environment. Furthermore, as detailed in Section V, Alternatives, of this Draft EIR, no feasible alternative was identified that would eliminate all of the Project's significant and unavoidable impacts.

3. Significant Irreversible Environmental Changes

CEQA Guidelines Section 15126.2(d) 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 would include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation. As demonstrated below, the Project would not consume a large commitment of natural resources or result in significant irreversible environmental changes.

a. Building Materials and Solid Waste

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

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

consumption of non-renewable building materials such as aggregate materials and plastics would be reduced and would not result in significant irreversible environmental changes.

b. Water

Consumption of water during construction and operation of the Project is addressed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. As evaluated therein, given the temporary nature of construction activities, the short-term and intermittent water use during construction of the Project would be less than the net new water consumption estimated for the Project at buildout. During operation, the estimated water demand for the Project would not exceed the available supplies projected by the City of Los Angeles Department of Water and Power (LADWP), as confirmed by the Water Supply Assessment and Utility Report prepared for the Project and included as Appendices T and G of this Draft EIR, respectively. Thus, LADWP would be able to meet the water demand of the Project, as well as the existing and planned future water demands of its service area. In addition, the Project would implement a variety of sustainability features related to water conservation to reduce indoor water use, as set forth in Section II, Project Description, and Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. Furthermore, the Project would be required to reduce indoor water use by at least 20 percent, in accordance with the City of Los Angeles Green Building Code. The Project would also implement Project Design Feature WAT-PDF-1, which includes block-by-block water conservation measures in excess of code requirements. Thus, as evaluated in Section IV.M.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, such would not result in significant irreversible environmental changes related to water supply.

c. Energy Consumption

During ongoing operation of the Project, non-renewable fossil fuels would represent the primary energy source, and thus the existing finite supplies of these resources would be incrementally reduced. Fossil fuels, such as diesel, gasoline, and oil, would also be consumed in the use of construction vehicles and equipment. Project consumption of non-renewable fossil fuels for energy use during construction and operation of the Project is addressed in Section IV.C, Energy, of this Draft EIR. As discussed therein, construction activities for the Project would not require the consumption of natural gas but would require the use of fossil fuels and electricity. On- and off-road vehicles would consume an estimated 482,116 gallons of gasoline and approximately 1,361,915 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.01 percent of the 2037 annual

on-road gasoline-related energy consumption and 0.2 percent of the 2037 annual diesel fuel-related energy consumption in Los Angeles County.⁴ Furthermore, as detailed in Section IV.C, Energy, of this Draft EIR, a total of approximately 177,558 kWh of electricity is anticipated to be consumed during Project construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. In addition, trucks and equipment used during construction activities would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Further, on-road vehicles (i.e., haul trucks, worker vehicles) would be subject to federal fuel efficiency requirements. Therefore, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Thus, impacts related to the consumption of fossil fuels during construction of the Project would be less than significant.

During operation, the Project's increase in electricity and natural gas demand would be within the anticipated service capabilities of LADWP and the Southern California Gas Company (SoCalGas), respectively. Specifically, the Project's electricity demand would represent less than 0.07 percent of LADWP projected sales in 2037. Furthermore, the Project's natural gas demand would represent approximately 0.005 percent of SoCalGas' forecasted consumption in 2035 (2035 is the latest projected year in the 2020 Gas Report). In addition, as discussed in Section IV.C, Energy, of this Draft EIR, the Project would comply with 2019 Title 24 standards and applicable 2019 CALGreen requirements. Gasoline and diesel fuel consumption during operation are estimated to be 955,733 gallons and 211,206 gallons, respectively, which would account for 0.03 percent of gasoline and diesel fuel consumption in Los Angeles County in 2037. In addition, as noted above, the Project is located in an HQTAs and includes a number of features that would reduce the number of VMT such as increase density, a mixed-use development, and increased destination and transit accessibility.

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

⁴ *Calculated based on EMFAC2017 for Buildout Year using Los Angeles County data. Please refer to Appendix F for detailed calculations.*

d. Environmental Hazards

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

e. Conclusion

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

4. Growth-Inducing Impacts

CEQA Guidelines Section 15126.2(d) requires that growth-inducing impacts of a project be considered in a Draft EIR. Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant that, for example, may allow for more construction in service areas). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community

service facilities, thus requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also require a discussion of the characteristics of projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Finally, the CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.

a. Population

As discussed in Section II, Project Description, of this Draft EIR, the Project includes 1,527 residential units comprised of 1,216 market rate units and 311 affordable units. Based on persons per residential unit factors from the City of Los Angeles Department of Transportation's (LADOT) VMT Calculator, development of the proposed residential units would result in an increase of an estimated 3,717 new residents.⁵ According to SCAG's 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS), the estimated population of 3,717 persons generated by the Project would represent approximately 0.17 percent of the projected growth in the SCAG region between 2020 and 2037 (i.e., the Project's baseline and buildout years),⁶ and 0.76 percent of the projected growth in the City of Los Angeles during the same period.⁷ As such, the 3,717 new residents generated by the Project would be within and, thus, consistent with SCAG growth forecasts, constituting a small percentage of projected City and regional growth. Therefore, the Project's residents would be well within SCAG's population projections in the 2020–2045 RTP/SCS for the Subregion and would not result in a significant direct growth-inducing impact

b. Employment

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

⁵ Based on population generation factors by use type from the Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020, Table 1. They are in residents per residential unit, and include: Multi-Family Residential = 2.25 and Affordable Housing-Family = 3.14: $(1,216 * 2.25) + (311 * 3.14) = 3,713$. However, because the VMT calculator itself uses 2.2533455879541 residents per multifamily unit, the resulting population is 3,717 $(1,216 * 2.2533455879541) + (311 * 3.14) = 3,717$.

⁶ $3,717 \text{ Project residents} \div 2,152,552 \text{ Regional population growth between 2020 and 2037} \times 100 = 0.17 \text{ percent}$.

⁷ $3,717 \text{ Project residents} \div 490,948 \text{ City population growth between 2020 and 2037} \times 100 = 0.76 \text{ percent}$.

are needed to complete a particular phase of the construction process. Thus, construction workers would not be expected to relocate to the Project vicinity as a direct consequence of working on the Project. Therefore, given the availability of construction workers, the Project would not be considered growth-inducing from a short-term employment perspective. Rather, the Project would provide a public benefit by providing new employment opportunities during the construction period.

Based on employee generation factors from LADOT's VMT calculator, conservatively assuming 100 percent of the restaurant uses would be fast food (identified by the LADOT as a higher employee generation rate), the proposed commercial and office uses would result in approximately 2,882 employees.^{8,9} When accounting for the industrial/warehouse uses to be removed from the Project Site and Off-Site Metro Parking Areas, the Project would result in a net increase of 2,821 jobs.¹⁰ Based on a linear interpretation of employment data from the 2020–2045 RTP/SCS, the Project's net increase of 2,821 jobs would represent approximately 0.29 percent of the projected employment growth in the SCAG Region between 2020 and 2037,¹¹ and 1.67 percent of the projected employment growth in the City of Los Angeles during the same period.¹² Therefore, the Project would not cause an exceedance of SCAG's employment projections contained in the 2020–2045 RTP/SCS.

In addition, the proposed office, restaurant, and retail uses would include a range of full-time and part-time positions that are typically filled by persons already residing in the vicinity of the workplace, and who generally do not relocate their households due to such employment opportunities. Therefore, given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Although it is possible that some of the employment opportunities offered by the Project would be filled by persons moving into the

⁸ Los Angeles Department of Transportation and Los Angeles Department of City Planning, *City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020, Table 1*. Based on 2.0 employees/ksf for general retail uses; 6.7 employees/ksf for fast food restaurant; and 4.0 employees/ksf for general office uses: $(28.4 * 2.0) + (75.0 * 6.7) + (580.374 * 4.0) = \sim 2,882$ employees.

⁹ Includes the 1,725 square foot Lankershim Depot to remain.

¹⁰ As discussed in Section II, *Project Description*, of this Draft EIR, the Project includes a potential land use exchange of up to 75,000 square feet of retail/restaurant uses for up to 75,000 square feet of office space should future market conditions warrant. Under this scenario, the Project would generate a net increase of 2,731 employees.

¹¹ $2,821$ net new Project employees \div $973,103$ Regional employment growth between 2020 and 2037 \times $100 = 0.29$ percent.

¹² $2,821$ net new Project employees \div $168,593$ City employment growth between 2020 and 2037 \times $100 = 1.67$ percent.

surrounding area, which could increase demand for housing, it is anticipated that most of this demand would be filled by then-existing vacancies in the housing market and others by any new residential developments that may occur in the vicinity of the Project Site. As such, the Project's office, restaurant, and retail uses would be unlikely to create an indirect demand for additional housing or households in the area.

c. Utility Infrastructure Improvements

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

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

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

a. Air Quality

Mitigation Measures AIR-MM-1 and AIR-MM-2 pertain to air quality impacts during construction and overlapping construction and operation. Specifically, Mitigation Measure AIR-MM-1 requires that, prior to demolition, the Project representative make available to the City of Los Angeles Department of Building and Safety and the South Coast Air Quality Management District (SCAQMD) a comprehensive inventory of all off road construction equipment, equal to or greater than 50 horsepower, that with the exception of demolition activities will be used during any portion of construction prior to demolition.

Mitigation Measure AIR-MM-2 requires the Project representative to require operator(s)/construction contractor(s) to commit to using 2010 model year or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/brake horsepower (bhp)-hr for particulate matter (PM) and 0.20 g/bhp-hr of NO_x emissions or newer, cleaner trucks for haul trucks associated with grading/excavation activities and concrete delivery trucks during concrete mat foundation pours. Mitigation Measure AIR-MM-2 also requires that the truck operator(s)/construction contractor(s) maintain records of trucks during the applicable construction activities associated with the Project and make these records available during the construction process and to the Lead Agency upon request.

These mitigation measures would reduce air quality impacts by requiring newer and properly tuned construction equipment which results in lower emissions. As such, implementation of these mitigation measures would not result in adverse secondary impacts.

b. Cultural Resources

Mitigation Measure CUL-MM-1 requires prior to commencement of construction on Block 0, as approved by Metro, the developer shall engage an architectural historian or historic architect meeting the Secretary of the Interior's Professional Qualifications Standards (Architectural Historian) to ensure the Lankershim Depot is relocated in conformance with the Secretary's Standards and guidance provided in Moving Historic Buildings by John Obed Curtis (National Park Service, 1979).

Mitigation Measure CUL-MM-2 requires that, prior to commencement of construction on Block 0, as approved by Metro, the Applicant engage a professional architectural photographer and an architectural historian meeting the Secretary of the Interior's Professional Qualifications Standards (Architectural Historian) to implement Historic American Building Survey (HABS) Level II documentation of the current status of the Lankershim Depot and its setting consisting of both photographs and a written narrative.

Mitigation Measure CUL-MM-3 requires the Applicant to prepare and implement a site-specific, art-in-public-places program on Block 0 that illustrates and interprets the important history of the Lankershim Depot to the development of North Hollywood (including establishing a budget for the public art prior to the commencement of construction that is sufficient to cover design fees and fabrication).

Mitigation Measure CUL-MM-4 requires all construction personnel and monitors who are not trained archaeologists to be briefed regarding unanticipated discoveries prior to the start of any excavation and grading activities.

Mitigation Measure CUL-MM-5 requires that, prior to any excavation activities, a qualified archaeologist shall be retained to monitor initial excavation and grading activities within the Project Site.

Mitigation Measure CUL-MM-6 details the procedures involved to reduce potential Project impacts on unanticipated archaeological resources unearthed during construction. These measures include, but are not limited to, halting or diverting ground disturbing activities in the vicinity of the find; establishing a buffer area; determining the significance of the find and establishing a treatment plan; and ultimately dispossession of the identified resources.

These mitigation measures represent procedural actions that would not affect the physical environment and would be beneficial in protecting cultural resources that could potentially be encountered on-site. As such, implementation of these mitigation measures would not result in adverse secondary impacts.

c. Hazards and Hazardous Materials

Mitigation Measure HAZ-MM-1 requires the applicant to retain a qualified environmental consultant to prepare a Soil Management Plan for Contaminated Soils (SMP) which will be submitted to the City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities. HAZ-MM-1 also requires appropriate containment of excavated soil or demolition debris/materials that exceed state or federal hazardous waste criteria. Such materials shall be placed in lined, sealed containers or wrapped and enclosed by tarps and transported by licensed hazardous waste haulers and disposed of at a licensed hazardous waste management facility approved for the specific disposed hazardous materials.

Mitigation Measure HAZ-MM-2 requires, prior to construction, that access to the parcel and building interior on the West Lot shall be obtained and interviews with the lessees/operators shall be conducted to determine the types and quantities of materials on-

site that warranted the Proposition 65 signage. It also requires that a limited soil investigation of the soil bordering the West Lot to the south be performed and any identified contamination be remediated in accordance with applicable regulations, if necessary

Mitigation Measure HAZ-MM-3 applies the City's Methane Ordinance to the West Lot, which is under Metro's jurisdiction.

Mitigation Measure HAZ-MM-1 would specifically avoid secondary impacts by requiring appropriate handling of any contaminated soil, and Mitigation Measures HAZ-MM-2 and HAZ-MM-3 represent procedural actions that would not affect the physical environment. As such, implementation of these mitigation measures would not result in adverse secondary impacts

d. Noise

Mitigation Measure NOI-MM-1 requires temporary and impermeable sound barriers to be installed throughout the various blocks prior to any demolition work conducted for each phase being permitted. 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 regulations. In addition, upon completion of construction, the temporary sound barrier would be removed. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

Mitigation Measure NOI-MM-2 states that prior to any construction activities involving vibration, the Applicant shall retain the services of a structural engineer or qualified professional building engineer to visit the Lankershim Depot (after it is relocated to the future location) and the Security Trust and Savings Bank building adjacent to the Project Site (Block 8) to inspect and document the apparent physical condition of the building's readily-visible features (i.e., any cracks or damage). In addition, the structural engineer shall survey the existing foundations and other structural aspects of the Security Trust and Savings Bank and provide a shoring design to protect the building from potential damage. Pot holing, ground penetrating radar, or other similar methods of determining the below grade conditions on the Project Site and the Security Trust and Savings Bank may be necessary to establish baseline conditions and prepare the shoring design. Monitoring of construction vibration is also required. Potholing utilizes air/water pressure and a vacuum to excavate the hole in order to locate underground structures or materials, which would not generate excessive vibration. Ground penetrating radar uses electromagnetic energy in the form of high-frequency radio waves rather than acoustic energy of seismic waves which effectively detect changes in electrical properties below the surface, and would not generate excessive vibration. In addition, this mitigation measure would not result in physical changes to the environment. As such, implementation of this mitigation measure would not result in significant secondary impacts.

e. Tribal Cultural Resources

Mitigation Measure TCR-MM-1 details the actions taken in the event objects or artifacts that may be tribal cultural resources are encountered during ground disturbing activities. These measures include, but are not limited to, halting or diverting ground disturbing activities in the vicinity of the find; tribal notification; involvement of a culturally affiliated tribal monitor (if warranted and requested); and development of a monitoring plan. This mitigation measure represents procedural actions that would not affect the physical environment and would be beneficial in protecting tribal cultural resources that could potentially be encountered on-site. As such, implementation of this mitigation measure would not result in adverse secondary impacts

6. Effects Not Found to Be Significant

CEQA Guidelines Section 15128 states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the EIR. An Initial Study was prepared for the Project and is included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City of Los Angeles determined through the Initial Study that the Project would not have the potential to cause significant impacts related to aesthetics; agriculture and forestry resources; air quality (odors); biological resources; cultural resources (human remains); geology and soils (landslides, soil erosion, and wastewater disposal systems); hazards and hazardous materials (located within an airport land use plan); hydrology and water quality; land use and planning (division of an established community); mineral resources; noise (airport and airstrip noise); population and housing (displacement); utilities and service systems (stormwater, telecommunications, and solid waste); and wildfires. A summary of the analysis provided in Appendix A for these issue areas is provided below.¹³

a. Aesthetics

Senate Bill (SB) 743 (Public Resources Code [PRC] Section 21099(d)) sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment.” PRC Section 21099 defines a “transit priority area” as an area within 0.5

¹³ On December 21, 2020, a fire destroyed the existing building on Block 7. Nevertheless, because it was present at the time the NOP was published on July 7, 2020, it is considered part of the existing conditions throughout this analysis.

mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21099 defines an “employment center project” as “a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099 defines an “infill site” as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that “visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA.”¹⁴

PRC Section 21099 applies to the Project. Therefore, the Project is exempt from aesthetic impacts. Nonetheless, the Initial Study included in Appendix A of this Draft EIR includes an analysis of aesthetic impacts for informational purposes only and not for determining whether the Project will result in significant impacts to the environment. As such, nothing in the aesthetic impact discussion in the Initial Study shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

b. Agricultural and Forest Resources

The Project Site is located in an urbanized area of the City of Los Angeles and is currently developed with the Metro North Hollywood Station, industrial/warehouse 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 impacts would occur.

¹⁴ *City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA.*

c. Air Quality

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

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

In addition, the construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403 regarding visible emissions violations.¹⁵ 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.¹⁶ Therefore, with compliance with existing regulatory requirements, the Project would not create odors that would adversely affect a substantial number of people.

Based on the above, the Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant, and no mitigation measures are required.

d. Biological Resources

The Project Site is located in an urbanized area and is developed with the Metro North Hollywood Station, industrial/warehouse uses and surface parking areas. Limited ornamental landscaping exists on-site. Due to the developed nature of the Project area, species likely to occur on-site are limited to small terrestrial and avian species typically

¹⁵ SCAQMD, *Visible Emissions, Public Nuisance, and Fugitive Dust*, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed April 19, 2021.

¹⁶ SCAQMD, *Rule 402, Nuisance*, adopted May 7, 1976.

found in developed settings. Thus, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (USFWS). There are no riparian or other sensitive natural communities, or federally protected wetlands as defined by Section 404 of the Clean Water Act on the Project Site or in the surrounding area. In addition, there are no established native resident or migratory wildlife corridors on the Project Site or in the vicinity. Accordingly, development of the Project would not impact any regional wildlife corridors or native wildlife nursery sites. Furthermore, no water bodies that could serve as habitat for fish exist on the Project Site or in the vicinity. As the USFWS database of conservation plans and agreements does not show any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans applicable to the Project Site, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans.

As discussed above, landscaping within the Project Site is limited. Within the Project Site, there are 61 trees that have a trunk diameter of 8 inches or greater (one of which is dead), 115 non-protected trees (11 of which are dead), and 113 City of Los Angeles rights-of-way trees (three of which are dead). There are also six off-site trees (five with a trunk diameter of 8 inches or greater and one non-protected) that could be potentially affected by the Project. Most, if not all, of the existing ornamental trees and shrubs within the Project Site would be removed during construction of the Project. Two coast live oak trees were identified at the northeast corner of Lankershim and Chandler Boulevards. However, both oak trees were planted as part of the Metro B (Red) Line construction in or around 1997 and are therefore not considered protected trees by the City's ordinance.¹⁷ Additionally, no off-site trees that could be affected by the Project were identified. In accordance with the Department of City Planning's policy, the on-site trees to be removed would be replaced on a 1:1 basis. In addition, the street trees to be removed would be replaced on a 2:1 basis, as required by the Department of Public Works. Replacement trees would be distributed in accordance with landscape and urban design guidelines to be adopted in connection with the Project's proposed Specific Plan.

The Project would comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. Compliance with the MBTA would ensure that impacts would be less than significant. In addition, in accordance with LAMC requirements, new trees would be planted within the Project Site. The planting of new tree species would be

¹⁷ Carlberg Associates, *Tree Inventory Report, District NoHo, revised June 4, 2020. Included as Appendix IS-1 of the Initial Study included as Appendix A of this Draft EIR.*

selected to enhance the pedestrian environment, convey a distinctive high quality visual streetscape, and complement trees in the surrounding area. The Project Site is located in an urbanized area and is currently developed with the Metro North Hollywood Station, industrial/warehouse uses, and surface parking areas. Landscaping within the Project Site is limited, and the Project Site does not support any habitat or natural community.^{18,19} No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.²⁰ Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan. Therefore, the Initial Study concluded that impacts to biological resources would be less than significant.

e. Cultural Resources

The Project Site is located within an urbanized area and has been subject to previous grading and development and the potential for uncovering human remains on the Project Site is low. Nevertheless, the Project would require grading, excavation, and other construction activities that could have the potential to disturb existing but undiscovered human remains. 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), which requires that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determined the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the person or persons it believes to be most likely descended from the deceased Native American. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98.

Therefore, 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

¹⁸ City of Los Angeles Department of City Planning, *Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 2350012221, 2350012902, 2350012920, 2350012921, 2350012922, 2350012923, 2350012924, 2350012925, 2350012926, 2350012927, 2350012928, 2350012929, 2350012930, 2350012931, 2350012932, 2350012933, 2350012934, 2350012935, 2350012936, 2350012937, 2350012938, 2350013906, 2350013907, 2350013908, 2350013920, 2350016006, 2350016906, and 2350016907.*

¹⁹ USEPA, NEPAAssist, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, accessed April 19, 2021.

²⁰ California Department of Fish and Wildlife, *California Natural Community Conservation Plans, April 2019.*

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, and no mitigation measures are required.

f. Geology and Soils

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

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

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

g. Hazards and Hazardous Materials

The Project Site is located approximately 1.9 miles southwest of the Hollywood–Burbank Airport. Based on a report published by the City of Burbank, the Project Site is not located within the 2017 65 dB CNEL noise contours for the airport, indicating airport noise is not an issue at the Project Site.²¹ Therefore, the Project would not expose people

²¹ *Bob Hope Airport 14 CFR Part 150 Noise Compatibility Study, Final Noise Compatibility Program Revision #2, March 2016.*

residing or working in the project area to excessive airport noise. Additionally, the Project would be required to comply with applicable Federal Aviation Administration (FAA) requirements regarding rooftop lighting for high-rise structures as well as the notice requirements imposed by the FAA for all new buildings taller than 200 feet, which include completion of Form 7460-1 (Notice of Proposed Construction or Alteration). Impacts would be less than significant.

h. Hydrology and Water Quality

During construction of the Project, particularly during the grading and excavation phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use, and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. Therefore, Project-related construction activities could potentially result in adverse effects on water quality. However, as Project construction would disturb more than 1 acre of soil, the Project would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (Order No. 2009-0009-DWQ, as well as its subsequent amendments 2010-0014-DWQ and 2012-0006-DWQ) pursuant to NPDES requirements. In accordance with the requirements of the NPDES Construction General Permit, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) adhering to the California Stormwater Quality Association BMP Handbook. The SWPPP would set forth BMPs to be used during construction for stormwater and non-stormwater discharges, including, but not limited to, 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. The SWPPP would be carried out in compliance with State Water Resources Control Board requirements and would also be subject to review by the City for compliance with the City of Los Angeles' *Best Management Practices Handbook, Part A Construction Activities*. During construction, the SWPPP would be referred to regularly and amended as changes occur throughout the construction process.

In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Prior to the issuance of a grading permit, the Applicant would be required to provide the City with evidence that a Notice of Intent has been filed with the State Water Resources Control Board to comply with the Construction General Permit. With compliance with these existing regulatory requirements that include specific BMPs to address surface water quality, impacts during construction would be less than significant.

Operation of the Project would introduce sources of potential stormwater pollution that are typical of residential, commercial, and office uses (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with circulation areas). Stormwater runoff from precipitation events could potentially carry urban pollutants into municipal storm drains. However, the Project would implement BMPs for managing stormwater runoff in accordance with the current City of Los Angeles Low Impact Development (LID) Ordinance requirements. The City's LID Ordinance sets the order of priority for selected BMPs. This order of priority is infiltration systems, stormwater capture and use, high efficiency biofiltration/bioretenion systems, and any combination of any of these measures. Consistent with regulatory requirements, the Project's Geotechnical Engineer has performed a site infiltration evaluation and has recommended the following BMPs to manage post-construction stormwater runoff and reduce the amount of pollutants entering the stormwater system:

- Promote evapotranspiration and infiltration, and the use of native and/or drought tolerant plants;
- Provide storm drain system stenciling and signage to discourage illegal dumping;
- Design material storage areas and loading docks within structures or enclosures to prevent leaks or spills of pollutants from entering the storm drain system;
- Provide evidence of ongoing BMP maintenance as part of a legal agreement with the City of Los Angeles. (Recorded covenant and agreements for BMP maintenance are part of standard building permit approval processing); and
- Design post-construction structural or treatment control BMPs to infiltrate stormwater runoff. Such stormwater treatment facilities and systems would be designed to meet the requirements of the LID Manual.

Additionally, as stated in the LID Manual, sites with greater than 50-percent site-disturbing activities must treat the entire site and infiltration facilities shall be sized to capture and infiltrate the design capture volume based on the runoff produced from the greater between the 85th percentile storm event and the 0.75-inch storm event. Based on these regulatory requirements, the Project would implement pretreatment systems and drywells at each site or drainage area to treat and infiltrate the stormwater runoff. Due to the variation in infiltration rates across the Project Site, some drainage areas will require a larger number of drywells regardless of acreage. This is due to the soil's variation in ability to allow stormwater to percolate.

As the Project Site currently does not have structural BMPs for the treatment of stormwater runoff from the existing impervious surfaces, implementation of the proposed BMPs would result in an improvement in surface water quality runoff from the entire Project

Site. In addition, the implementation of BMPs, which would utilize the natural absorption and filtration characteristics of vegetated swales and pervious surfaces, would allow for more opportunities to direct stormwater to flow through the planting media where pollutants are filtered, absorbed, and biodegraded by the soil and plants, prior to infiltrating to the ground below.

Therefore, with implementation of the BMPs described above, or other equivalent BMPs as approved by LASAN, that would be implemented in accordance with regulatory requirements, operational impacts on surface water quality would be less than significant.

Development of the Project would include excavations to a maximum depth of approximately 60 feet below ground surface. Historic high groundwater level in the vicinity of the Project Site was on the order of 10 feet below grade. Groundwater was not encountered in borings drilled to a depth of 62 feet. Therefore, Project construction activities are not expected to encounter groundwater and temporary dewatering is not expected to be required. Nevertheless, in the unlikely event groundwater is encountered during construction, temporary dewatering systems such as dewatering tanks, sand media particulate, pressurized bag filters, and cartridge filters would be utilized in compliance with the NPDES permit. These temporary systems would comply with all relevant NPDES requirements related to construction. As such, groundwater quality would not be impacted from dewatering activities.

With regard to groundwater recharge, the percolation of precipitation that falls on pervious surfaces is variable, depending on the soil type, condition of the soil, vegetative cover, and other factors. The Project Site is currently approximately 98 percent impervious. With implementation of the Project, impervious surfaces would comprise approximately 91 percent of the Project Site. Therefore, construction of 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. Additionally, the Project would include the installation of structural BMPs as a means of pretreatment prior to infiltration of stormwater, which would allow for treatment of the on-site stormwater prior to potential contact with the groundwater below. Furthermore, the Project would not include the installation of water supply wells and there are no existing wells or spreading ground within one mile of the Project Site. 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. Impacts would be less than significant.

Construction activities associated with the Project would include excavation to a maximum of 60 feet for subterranean parking levels, as well as grading for building structures, foundations, and hardscape and landscape around the structures. It is anticipated that grading activities of approximately 672,300 net cubic yards of soil would be

involved in construction of the Project, including 587,300 cubic yards of export. These activities have 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, the Project would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. BMPs would be designed to reduce runoff and pollutant levels in runoff during construction. The NPDES and SWPPP measures would contain and treat, as necessary, stormwater or construction watering on the Project Site so runoff does not impact off-site drainage facilities or receiving waters. In addition, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion.

Development of the Project would include development of new buildings, paved areas, and landscaped areas, resulting in a decrease in impervious surface area from 98 to approximately 91 percent as a result of the development. Runoff would follow new discharge paths and drain to on-site storm drain infrastructure, including catch basins, planter drains, building roof drain downspouts, pretreatment systems, and drywells throughout the Project Site. As a result of the decrease in impervious surface area and new infrastructure, stormwater flows would be reduced by approximately 1.57 cfs, a three-percent reduction. Therefore, the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Impacts would be less than significant.

Implementation of BMP systems proposed as part of the Project would result in a substantial improvement in surface water quality runoff from the entire Project Site. In addition, the Project would result in a three-percent decrease in stormwater flows on the Project Site. Therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant.

The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles. However, the Safety Element of the City of Los Angeles General Plan does map the Project Site as being located within a flood impact zone associated with the Encino

Reservoir/Hansen Dam.²² Although the site is mapped within an inundation zone for the dam, catastrophic failure of this dam is expected to be a very unlikely event in that dam safety regulations exist and are enforced by the Division of Safety of Dams, Army Corp of Engineers, and the Department of Water Resources. Inspectors would require dam owners to perform work, maintenance or implement controls if issues are found with the safety of the dam. The dams are under continuous monitoring for safety against failure and the potential for seismically-induced flooding to affect the Project Site due to dam failure is low. Therefore, the risk of flooding from inundation by dam failure is considered low.

The Project Site is located approximately 12.8 miles northeast of the Pacific Ocean and the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami.²³ Therefore, no tsunami or tsunami events would be expected to impact the Project Site. Additionally, there are no standing bodies of water on or near the Project Site that could result in a seiche.

i. Land Use and Planning

The Project Site is located in a highly urbanized area characterized by a mixture of low- and mid-rise buildings occupied by a mix of uses. The Project would replace the existing surface parking and industrial/warehouse uses within the Project Site with a mixed-use development and enhanced transit facilities. All proposed development would occur within the boundaries of the Project Site and Off-Site Metro Parking Areas as they currently exist, and the Project does not propose a freeway or other large infrastructure that would divide a community. The Project would, in fact, remove existing barriers between communities on either side of the Project Site through the development of new streets connecting to the existing street grid, as well as providing a pedestrian-friendly development on the Project Site. Therefore, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant.

j. Mineral Resources

No mineral extraction operations currently occur on the Project Site. The Project Site is located within an urbanized area and has been previously disturbed by development. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a

²² *City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G, p. 59.*

²³ *City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G, p. 59.*

mineral producing area as classified by the California Geologic Survey. The Project Site is also not located within a City-designated oil field or oil drilling area. Therefore, the Initial Study concluded that no impacts related to mineral resources would occur.

k. Noise

The Project Site is not located within the vicinity of a private airstrip or airport land use plan. The Project Site is, however, located approximately 1.9 miles southwest of Hollywood–Burbank Airport. As discussed above, based on a report published by the City of Burbank, the Project Site is not located within the 2017 65 dB CNEL noise contours for the airport, indicating airport noise is not an issue at the Project Site.²⁴ Therefore, the Project would not expose people residing or working in the project area to excessive airport noise. Impacts would be less than significant.

l. Population and Housing

As no housing currently exists on the Project Site, the Project would not cause the displacement of any existing people or housing and therefore likewise would not require the construction of replacement housing elsewhere. Therefore, no impact would occur.

m. Utilities and Service Systems

(1) Stormwater

As discussed above, the Project would implement a combination of BMPs as required by the City's LID Manual to manage stormwater pollution. The existing Project Site does not have any structural or LID BMPs to treat or infiltrate stormwater. Therefore, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions and would serve to prevent on-site flooding and nuisance water on the Project Site. Therefore, the Project would not require the construction of new stormwater drainage facilities or expansion of existing facilities. Impacts would be less than significant.

(2) Telecommunications Facilities

The Project Site is located in an area served by existing telecommunications infrastructure. Installation of new telecommunications infrastructure would primarily take place on-site, with minor off-site work associated with connections to the existing system.

²⁴ *Bob Hope Airport 14 CFR Part 150 Noise Compatibility Study, Final Noise Compatibility Program Revision #2, March 2016.*

Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. However, the Project would prepare a Construction Traffic Management Plan pursuant to Project Design Feature TR-PDF-1, which would ensure safe pedestrian access as well as emergency vehicle access and safe vehicle travel in general, to reduce any temporary pedestrian and traffic impacts occurring as a result of construction activities. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration (i.e., months) and would cease to occur when installation is complete. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers. As such, the Project would not require or result in the relocation or construction of new or expanded telecommunications facilities. Impacts would be less than significant.

(3) Solid Waste

The construction activities necessary to build the Project would generate debris, some of which may be recycled to the extent feasible. Pursuant to the requirements of Senate Bill (SB) 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. After accounting for mandatory recycling, the Project would result in approximately 1,939 tons of construction and demolition waste. Given the remaining permitted capacity at the Azusa Land Reclamation facility, which is approximately 58.84 million tons, as well as the remaining 148.40 million tons of capacity at the Class III landfills serving the County, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.²⁵

As shown in Table VI-1 on page VI-32, upon full buildout, the Project would generate approximately 8,867 tons of solid waste per year when accounting for the removal of the existing land uses.²⁶ The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as AB 939 which requires California cities, counties, and approved regional solid

²⁵ *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.*

²⁶ *As discussed in Section II, Project Description, of this Draft EIR, the Project includes a potential land use exchange of up to 75,000 square feet of retail/restaurant uses for up to 75,000 square feet of office space should future market conditions warrant.*

**Table VI-1
Estimated Project Solid Waste Generation**

Building	Size	Employee Generation Rate per ksf^a	Estimated No. of Employees	Solid Waste Generation Rate^b	Total Generation (tons/year)
Existing					
Industrial/warehouse	49,111 sf	1.0	49 emp	8.93/lbs/emp/day	80
Retail	1,725 sf	2.0	4 emp	8.93/lbs/emp/day	7
Total Existing					87
Existing to be Removed					
Industrial/warehouse	49,111 sf	1.0	49 emp	8.93/lbs/emp/day	80
Proposed^c					
Residential	1,527 du	N/A	N/A	12.23/lbs/du/day	3,408
Restaurant	75,000 sf ^d	6.7	503 emp	10.53/lbs/emp/day	967
Retail	28,400 sf	2.0	57 emp	10.53/lbs/emp/day	110
Office	580,374 sf	4.0	2,322	10.53/lbs/emp/day	4,462
Total with Implementation of Project					8,947
Total Net Increase					8,867
<p><i>du = dwelling unit</i> <i>emp = employees</i> <i>lbs = pounds</i> <i>ksf = thousand square feet</i> <i>sf = square feet</i></p> <p>^a Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020, Table 1.</p> <p>^b Residential, commercial, and industrial solid waste generation rates are from the City's L.A. City CEQA Thresholds Guide. The L.A. CEQA Thresholds Guide does not include a generation factor for office uses, so the commercial rate was used.</p> <p>^c As discussed in Section II, Project Description, of this Draft EIR, the Project includes a potential land use exchange of up to 75,000 square feet of retail/restaurant uses for up to 75,000 square feet of office space should future market conditions warrant. This scenario would result in a net increase of 8,869 tons per year of solid waste.</p> <p>^d Conservatively assumes 100 percent of restaurant uses would be fast food.</p> <p>Source: Eyestone Environmental, 2022.</p>					

waste management agencies responsible for enacting plans and implementing programs to divert 50 percent of their solid waste away from landfills and compliance with AB 341, which requires California commercial enterprises and public entities that generate four or more cubic yards per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste LA franchising system, which is expected to result in a reduction of

landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.²⁷ The estimated annual net increase in solid waste requires California commercial enterprises and public entities that generate 4 cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Solid waste that would be generated by the Project represents approximately 0.006 percent of the remaining capacity for the County's Class III landfills open to the City of Los Angeles.²⁸ The Project's estimated solid waste generation would therefore represent a nominal percentage of the remaining daily disposal capacity of the County's Class III landfills.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.²⁹ The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling in accordance with AB 939, and providing for the recycling of organic waste in accordance with AB 1826. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant.

n. Wildfire

The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone³⁰ or fire buffer zone.³¹ In addition, the Project Site is not located near State responsibility lands. Therefore, no impacts related to the following would occur: (1) the impairment of an adopted emergency response plan or emergency evaluation plan related

²⁷ *The Zero Waste LA Franchise System would divide the City into 11 zones and designate a single trash hauler for each zone. Source: LA Sanitation, Final Program Environmental Impact Report for City Ordinance: City-Wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling (SCH# 2013021052), March 2014.*

²⁸ $8,872 \text{ tons per year} / 148.40 \text{ million tons} \times 100 = 0.006 \text{ percent}$

²⁹ *Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.*

³⁰ *City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 2350012221, 2350012902, 2350012920, 2350012921, 2350012922, 2350012923, 2350012924, 2350012925, 2350012926, 2350012927, 2350012928, 2350012929, 2350012930, 2350012931, 2350012932, 2350012933, 2350012934, 2350012935, 2350012936, 2350012937, 2350012938, 2350013906, 2350013907, 2350013908, 2350013920, 2350016006, 2350016906, and 2350016907, <http://zimas.lacity.org/>, accessed April 19, 2021. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.*

³¹ *City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.*

to wildfire; (2) the exposure of Project occupants to pollutant concentrations from a wildfire; (3) the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or (4) the exposure of people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes.