

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, the significant unavoidable impacts of the Project would include Project-level and cumulative construction noise and vibration impacts. These impacts are summarized below.

a. Noise

(1) On-Site Construction Noise

As discussed in Section IV.G, Noise, of this Draft EIR, implementation of Mitigation Measure NOI-MM-1 would reduce the Project's and cumulative construction noise levels to the extent feasible. Specifically, implementation of Mitigation Measure NOI-MM-1, which involves the installation of temporary sound barriers, would reduce the noise generated by on-site construction activities at the off-site sensitive uses by a minimum 15 dBA at the Triangle Square Apartments (residential use) adjacent to the Project Site to the northeast (receptor location R1) and the Sound Factory recording studio to the north (receptor location R7);¹ a minimum 8 dBA at the Los Angeles Film School to the southeast (receptor

¹ As noted in Section IV.G, Noise, of this Draft EIR, although recording studio uses are not defined as noise sensitive receptors by the L.A. CEQA Thresholds Guide, potential noise impacts at the nearest recording studios, including the Goya Studios located at 1541 Cahuenga Boulevard (represented by receptor location R4) and the Sound Factory located at 6357 Selma Avenue (represented by receptor location R7), were evaluated for informational purposes only.

location R2), and a minimum 10 dBA at the Cosmo Lofts (receptor location R6). However, the estimated construction-related noise levels would still exceed the significance threshold at receptor locations R1 (at the upper levels of this receptor) and R7 with the implementation of NOI-MM-1. There are no other feasible mitigation measures that could further reduce the construction noise at receptor locations R1 and R7 to below the significance threshold. Therefore, Project-level construction noise impacts associated with on-site noise sources would remain significant and unavoidable. Cumulative impacts related to on-site construction noise would also be significant and unavoidable (in the event of concurrent construction activities associated with Related Project No. 2 and Related Project No. 3).

(2) Off-Site Construction Noise

As discussed in Section IV.G, Noise, of this Draft EIR, the hourly noise levels generated by construction trucks during all stages of Project construction would be consistent with the existing daytime ambient noise levels along Argyle Avenue and Gower Street, which would be below the significance criteria of 5-dBA increase over the ambient noise level. However, the estimated noise levels from Project-related construction trucks during the peak period of construction along Selma Avenue (between Argyle Avenue and the Project Site and between Argyle Avenue and Gower Street) would exceed the 5-dBA significance criteria. Conventional mitigation measures, such as providing temporary noise barrier walls to reduce the off-site construction truck traffic noise impacts, would not be feasible, as the barriers would obstruct access and visibility to the properties along the anticipated haul routes. There are no other feasible mitigation measures that could be implemented to reduce this short-term impact. Therefore, Project-level construction noise impact associated with off-site construction traffic would remain significant and unavoidable. Cumulative impacts related to off-site construction noise along Gower Street (between US-101 and Selma Avenue) and Selma Avenue (between Cahuenga Boulevard and Gower Street) would also be significant and unavoidable (in the event of concurrent construction activities from Related Project No. 12, Related Project No. 21, Related Project No. 34, and Related Project No. 35).

b. Vibration

(1) On-Site Construction Vibration (Human Annoyance)

As discussed in Section IV.G, Noise, of this Draft EIR, estimated ground-borne vibration levels at the Sound Factory recording studio to the north of the Project Site (receptor location R7) would exceed the 65-VdB significance criteria for human annoyance. The vibration exceedance would occur during the demolition and grading/excavation phases with large construction equipment (i.e., large bulldozer, caisson drilling and loaded trucks) operating within 140 feet of receptor location R7. As discussed in Section IV.G,

Noise, mitigation measures, including the installation of a wave barrier, were considered and determined to be infeasible. There are no other feasible mitigation measures that could be implemented to reduce the temporary vibration impacts with respect to human annoyance from on-site construction activities to receptor location R7. Therefore, Project-level construction impacts associated with on-site construction vibration (human annoyance) would remain significant and unavoidable.

(2) Off-Site Construction Vibration (Human Annoyance)

As discussed in Section IV.G, Noise, of this Draft EIR, heavy-duty construction trucks would generate ground-borne vibration as they travel along the Project's anticipated haul routes. Temporary vibration levels could reach approximately 72 VdB periodically as trucks pass sensitive receptors along the anticipated haul routes. Therefore, the sensitive uses along anticipated construction truck routes (including Gower Street, Yucca Street, Cahuenga Boulevard, Selma Avenue, and Argyle Avenue between the Project Site and US-101) would be exposed to ground-borne vibration up to 72 VdB, which would exceed the 65-VdB significance criteria (for recording studio use) and would be at the 72-VdB significance criteria (for residential and hotel uses). As described in Section IV.G, Noise, there are no feasible mitigation measures to reduce these potential vibration impacts with respect to human annoyance. Therefore, Project-level construction impacts associated with off-site construction vibration (human annoyance) would remain significant and unavoidable. Cumulative impacts related to off-site vibration (human annoyance) during construction would also be significant and unavoidable (to the extent that other related projects use the same haul route as the Project).

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

In addition to identification of a project's significant unavoidable impacts, CEQA Guidelines Section 15126.2(b) requires that an EIR describe the reasons why a project is being proposed, notwithstanding the effects of the identified significant and unavoidable impacts. The reasons why the Project has been proposed are grounded in the underlying purpose of the Project and the Project's objectives, as outlined in Section II, Project Description, of this Draft EIR. The underlying purpose of the Project is to redevelop the Project Site by constructing a new mixed-use development that provides new multi-family housing opportunities at a range of income levels, as well as new neighborhood-focused ground-floor commercial uses that serve the community and promote walkability. The Project's specific objectives are as follows:

- Maximize the provision of high-density, multi-family housing units, including affordable housing units, to support the much-needed demand for housing at a range of income levels;

- Locate residential and commercial uses in a high quality transit area and transit priority area, thereby promoting sustainability and reducing automobile dependency and Vehicle Miles Traveled (VMT).
- Redevelop and improve the visual character of the surface parking portion of the Project Site with a development that is compatible in scale and design with the character of the surrounding area;
- Contribute to economic investment in the Hollywood Community Plan area through the creation of construction and retail/restaurant jobs;
- Create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street-level uses;
- Promote sustainable development by incorporating “Green” principles in the design of the Project capable of meeting the standards of LEED® Certified or equivalent green building standards, including an energy-efficient building, a pedestrian- and bicycle-friendly site design, water conservation features, and waste reduction features; and
- Incorporate the best practices for smart growth² by providing housing, employment, and retail/restaurant opportunities within an employment hub with walkable streets, a bike-friendly environment, and access to public transit.

The underlying purpose and objectives of the Project are closely tied to the goals, objectives, and policies set forth in applicable plans, including: the City of Los Angeles General Plan, Hollywood Community Plan (Community Plan), Hollywood Redevelopment Plan; Los Angeles Municipal Code (LAMC); and the Southern California Association of Government’s (SCAG’s) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). How the Project would support the applicable goals, objectives, and policies of these plans is summarized below and discussed in Section IV. F, Land Use and Planning, and in Appendix F, of this Draft EIR, which include more detailed discussions of the Project’s consistency with these, and other, plans.

² According to the United States Environmental Protection Agency (USEPA), “smart growth” refers to a range of development and conservation strategies that help protect human health and the natural environment and make communities more attractive, economically stronger, and more socially diverse. These strategies include mixed land uses; compact building design; a range of housing opportunities and choices; walkable neighborhoods; distinctive, attractive communities with a strong sense of place; preservation of open space, farmland, natural beauty, and critical environmental areas; development directed towards existing communities; a variety of transportation choices; predictable, fair, and cost effective development decisions; and community and stakeholder collaboration in development decisions.

a. City of Los Angeles General Plan

(1) Framework Element

The Project Site is identified as a Regional Center on the Framework Element's Long Range Land Use Diagram, which is characterized as a focal point of regional commerce, identity, and activity. The Framework Element encourages mixed-use developments in Regional Centers, integrating housing and commercial uses in concert with supporting services, recreational uses, open spaces, and amenities, with such centers typically providing a significant number of jobs and functioning as a hub for regional transit. The Project would provide a total of 270 residential dwelling units (including 27 Extremely Low Income housing units) and 6,790 square feet of ground floor commercial space within a City-designated Transit Priority Area (TPA) and a SCAG-designated High Quality Transit Area (HQTA), thereby integrating housing and commercial uses within a regional transit hub. In addition, the Project would include up to 30,918 square feet of open space and recreational amenities that would support the needs of the Project residents. Furthermore, pursuant to the Framework Element, Regional Centers generally fall within a floor area ratio (FAR) range of 1.5:1 to 6.0:1 and are characterized by 6- to 20-story buildings or higher. Thus, as the Project would include a 25-story building and would have a maximum FAR of 4.5:1, the Project would be consistent with the type of use and at the intensity and height envisioned for a Regional Center.

The Project would support the Framework Element's Land Use Chapter as it would: (1) be consistent with development within Regional Centers; (2) create a diverse mix of uses that supports the needs of the City's existing and future residents, businesses, and visitors (Objective 3.1); (3) promote an improved quality of life by providing for a spatial distribution of development that promotes a reduction of vehicular trips, VMT, and air pollution (Objectives 3.2); (4) encourage new multi-family residential and retail uses in a Regional Center along a primary transit corridor (Objectives 3.4 and 3.15); (5) provide multi-family residential units in an area where there is sufficient public infrastructure and services and on a site permitted for such uses (Objective 3.7 and Policy 3.7.1); (6) reinforce an existing Regional Center that accommodates a broad range of uses that provide job opportunities, are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles (Objective 3.10); and (7) accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity (Objective 3.16).

The Project would support the goals included in the Framework Element's Housing Chapter by providing a distribution of housing opportunities by type and cost for all residents of the City (Goal 4A) through the development of 270 new multi-family residential units, consisting of 92 studios, 93 one-bedroom units, 75 two-bedroom units, and 10 three-bedroom units. Of the 270 residential units, 27 would be restricted for Extremely Low

Income households. In addition, the Project would encourage the location of new multi-family housing to occur in proximity to transit and within high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods (Objective 4.2). The Project would be located in a vibrant and active area that is physically distanced from lower-density neighborhoods and that is well-served by public transit, including bus stops along many of the surrounding roadways and the Metropolitan Transportation Authority (Metro) B Line Hollywood/Vine Station located within 1,000 feet of the Project Site.

The Project would promote the goals, objectives, and policies of the Urban Form and Neighborhood Design Chapter applicable to the Project by contributing to the overall livability of the City by building on the strength of the neighborhood while functioning at both a neighborhood and citywide scale (Goal 5A). The Project Site is located in an area that is well served by transit and where activity is already concentrated (Objective 5.2). Consistent with policies related to Regional Centers, the Project would consist of a 25-story mixed-use structure that would include ground-level commercial uses situated along pedestrian-oriented streets. In addition, the Project would replace a surface parking area with a building that has been designed to complement its surroundings by incorporating elements that would respond to the neighborhood while providing unique features that would enhance the quality of the public realm (Objective 5.5). In addition, the Project would incorporate elements that promote individual and community safety (Objective 5.9).

The Project would further the goals and policies of the Open Space and Conservation Chapter of the Framework Element by incorporating a variety of open space and recreational amenities for Project residents and guests totaling approximately 30,918 square feet, which would exceed LAMC requirements. In addition, the Project would enhance pedestrian activity along Selma Avenue and Ivar Avenue through elements of building design and proposed streetscape amenities, including ground-level, community-serving commercial uses, a publicly-accessible setback gathering area at the corner of Selma Avenue and Ivar Avenue, and new landscaping. Furthermore, the Project would incorporate elements that promote individual and community safety throughout the Project Site, including open space areas that are well-lit and equipped with a closed-circuit camera system to allow for constant monitoring of such areas to ensure public safety and security at all times.

The Economic Development Chapter is designed to facilitate business retention and job growth. The Project would support the City's objective to establish a balance of land uses through the development of a mixed-use project with residential, retail, and restaurant uses in an area well-served by public transit (Objective 7.2). The proposed community-serving commercial uses would support the needs of the local population, including the needs of the new residents of the Project Site (Policies 7.2.5, 7.6.1, 7.6.3). The Project would also support the goal, objectives, and policies regarding housing, including the

provision of a range of housing opportunities with access to local services and to transportation (Objective 7.9); the incorporation of affordable housing (Policy 7.9.1); and the concentration of residential development along mixed-use and transportation corridors (Policy 7.9.2).

(2) Mobility Plan 2035

Mobility Plan 2035, which serves as the Transportation Chapter of the Framework Element, recognizes the importance of maximizing the efficiency of existing and proposed infrastructure through advanced transportation technology, reducing vehicle trips and VMT, and encouraging new development near transit centers. The Project would exemplify the type of project in that it would be a mixed-use project on an urban infill site adjacent to transit within a City-designated TPA and a SCAG-designated HQTAs. Specifically, the Project would provide for safe passage of all modes of travel during construction by preparing and implementing a Construction Traffic Management Plan pursuant to TR-PDF-2 that would encourage safety measures around the construction site by facilitating traffic and pedestrian movement and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. (Policy 1.6). The Project would also recognize walking as a component of every trip, ensure high quality pedestrian access, and provide a safe and comfortable walking environment by promoting walkability through the Project's design and pedestrian and streetscape improvements (Policy 2.3). In addition, the Project would recognize all modes of travel by providing adequate and enhanced pedestrian and vehicular access and providing bicycle facilities within a TPA and HQTAs in close proximity to transit (Policy 3.1). The Project would also promote equitable land use decisions that result in fewer vehicle trips by providing a mix of residential and commercial uses proximity to employment, destinations, and other neighborhood services in a transit-rich area, and in a designated TPA and HQTAs. (Policies 3.3 and 3.4). The Project would implement TDM measures, including the provision of convenient and secure bicycle parking facilities and the application of parking reduction rates, which would promote non-automobile travel and reduce the use of single-occupant vehicles and VMT (Policies 3.8, 4.8, and 5.2).

(3) Housing Element

The overall vision of the Housing Element is to create housing opportunities that enhance affordability, equity, livability, and sustainability by remedying discriminatory housing practices and creating a city with a range of housing types, sizes, and costs in proximity to jobs, transit, amenities, and services. The Project would support the goals of the Housing Element by producing an ample supply of housing, including various unit types (e.g., studio, one-, two-, and three-bedroom units) at a range of prices (including affordable housing). In addition, the Project would promote healthy, livable, and sustainable neighborhoods that have mixed-income housing, jobs, amenities, services, and transit by

providing 270 multi-family residential units, including 27 units restricted for Extremely Low Income Households) and 6,790 square feet of ground floor commercial space in an area that is proximate to jobs and transit. The Project would also provide open space and amenities.

(4) Health and Wellness Element

The Health and Wellness Element includes objectives and implementation programs to elevate health as a priority for the City's future growth and development. The Project would be consistent with the applicable goals and objectives of the Health and Wellness Element by expanding housing opportunities, generating temporary and permanent jobs, avoiding displacement of existing housing and residents, promoting healthy living, and integrating healthy building design and construction on a site that is proximate to public transit.

b. Hollywood Community Plan

The proposed land uses would be consistent with the Project Site's Regional Center Commercial land use designation and the Project would support the land use objectives and policies of the Community Plan. The Project would provide a variety of housing opportunities to help satisfy the needs and desires of various economic segments within the Community Plan area, maximizing the opportunity for individual choice (Objective 3). Specifically, the Project would introduce 270 new residential units (including 27 units restricted for Extremely Low Income households) that would consist of a variety of configurations and be available at a variety of price ranges. In addition, the Project would not require the construction of public services facilities, and the utilities that serve the Project Site would have capacity to serve the Project. Furthermore, the Project would include up to 30,918 square feet of open space and recreational amenities (Objective 5). The Project would coordinate land use and circulation by promoting opportunities for the use of alternative modes of transportation, including use of public transportation, walking, and bicycling (Objective 6). As previously discussed, the Project Site is located in a highly urbanized area and designated TPA and HQTAs that is well-served by public transit provided by Metro and Los Angeles Department of Transportation (LADOT). In addition, the Project would include various streetscape improvements and street-level commercial uses and would provide 166 short- and long-term bicycle parking spaces, per LAMC requirements.

c. Hollywood Redevelopment Plan

The Hollywood Redevelopment Plan designates the Project Site as Regional Center Commercial, which is intended to provide for economic development through the orderly development of a high quality commercial, recreational, and residential urban environment

with a focus on areas served by adequate transportation facilities and transportation demand management programs. According to Section 506.3 of the Redevelopment Plan, new and rehabilitated residential uses are encouraged within the Regional Center Commercial land use designation. Thus, the types of land uses proposed by the Project would be consistent with the existing Regional Center Commercial land use designation. Furthermore, the Project would support the goals of the Hollywood Redevelopment Plan. Specifically, the Project would provide a mix of residential and community-serving commercial uses that would promote a balanced community within the Redevelopment Area (Goal 3). In addition, the Project would provide housing choices and increase the supply and improve the quality of housing for all income and age groups, especially for persons with low and moderate incomes, but providing 270 new residential units (27 units would be reserved for Extremely Low-Income households) consisting of a mix of 92 studios, 93 one-bedroom units, 75 two-bedroom units, and 10 three-bedroom units in varying sizes and configurations (Goal 9). The Project would provide new mixed-use development on an infill site in conformance with the Redevelopment Plan's use and density standards, without intruding on nearby residential neighborhoods (Goal 10). Moreover, the Project would retain six existing commercial buildings on the Project Site that contribute to the character of the community (Goal 11). Furthermore, the Project would support and encourage a circulation system that will improve the quality of life in Hollywood by promoting the use of public transportation and a reduction in VMT by concentrating new development in a designated HQTAs and TPAs, providing 166 bicycle parking spaces, and enhancing the pedestrian environment (Goal 12).

d. Los Angeles Municipal Code

The northeastern portion of the Project Site, which contains the majority of the Development Area, is zoned C4-2D (Commercial Zone, Height District 2 with Development Limitation) and the southern and western portions of the Project Site, which contain the existing commercial uses, are zoned C4-2D-SN (Commercial Zone, Height District 2 with Development Limitation, Hollywood Signage Supplemental Use District). The C4 zone permits a wide array of land uses including commercial, office, retail, and hotel uses, as well as multi-family residential uses permitted by the R4 zone. The Regional Center Commercial land use designation for the Project Site also permits the R5 zone residential density calculation of 200 square feet of lot area per dwelling unit for mixed-use projects. The Height District 2 designation, in conjunction within the C4 Zone, does not impose a maximum building height limitation but does impose a maximum FAR of 6:1. However, the "D" designation limits the total floor area contained in all buildings to a maximum FAR of 3:1 (per Ordinance No. 165,660, adopted in 1990). The "SN" designation indicates that the southern and western portions of the Project Site are located within the Hollywood Signage Supplemental Use District (HSSUD), where signage is subject to special regulations designed to enhance the distinctive aesthetics of the HSSUD and to eliminate blight created by poorly placed, badly designed signs. The uses proposed by the Project would

be consistent with the types of uses permitted in the C4 Zone. Furthermore, the Project Site is currently subject to a D Limitation that permits a maximum FAR of 3:1, equivalent to a total floor area of 200,688 square feet. However, per the City's adopted Transit Oriented Communities (TOC) Guidelines and LAMC Section 12.22 A.31, and pursuant to the Project Site's location within a Tier 3 TOC area, in exchange for the Applicant setting aside a specified amount of affordable housing, the Project may request a TOC base incentive to increase the FAR of the commercially zoned Project Site by 50 percent. Accordingly, in conformance with the TOC Guidelines for Tier 3 areas, the Project would set aside 10 percent of its 270 units (27 units) for Extremely Low Income households, and may therefore utilize a 50-percent FAR increase, allowing a total FAR of up to 4.5:1 (up to 301,032 square feet) for the Project Site. The Project proposes to contain a total of 300,996 square feet of floor area; therefore, the proposed FAR would be within the limit permitted by the TOC Guidelines and the LAMC.

e. 2020–2045 RTP/SCS

The 2020–2045 RTP/SCS identifies mobility, accessibility, sustainability, and high quality of life, as the principles most critical to the future of the region. Further, it balances the region's future mobility and housing needs with economic, environmental, and public health goals. Within the 2020–2045 RTP/SCS, the overarching strategy includes plans for "High Quality Transit Areas," "Livable Corridors," and "Neighborhood Mobility Areas" as key features of a thoughtfully planned, maturing region in which people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life. In support of the vision of SCAG's 2020–2045 RTP/SCS, the Project would focus housing within a TPA and HQTAs, which would promote SCAG's objective to maximize mobility and accessibility for the region. The Project would also support SCAG's goals to improve mobility, accessibility, reliability, and travel safety (Goal 2); to enhance the preservation, security, and resilience of the regional transportation system (Goal 3); and to increase person and goods movement and travel choices (Goal 4) by locating the proposed uses within an existing urbanized area with an established network of roads and freeway and within a transit-rich neighborhood. In addition, the Project would maximize mobility and accessibility by providing opportunities for walking and biking and opportunities for the use of other alternative modes of travel, and the Project would not include any design features that could pose safety issues to travelers. The Project would also support goals related to climate and healthy and equitable communities (Goal 5, Goal 6, and Goal 7) by implementing Transportation Demand Management (TDM) measures that would include strategies to promote non-automobile travel and reduce the use of single-occupant vehicle trips, thereby facilitating a reduction in VMT and improved air quality. The Project would also include project features through compliance with regulatory requirements that would further support and promote environmental sustainability. The Project's mixed-use design within close proximity to a variety of public transit options would further support a healthy

community. Lastly, the Project would contain a diverse mix of housing types in an area that is supported by multiple transportation options (Goal 9), as outlined above.

f. Conclusion

Based on the above, the Project reflects a development that is consistent with the overall vision of the City and SCAG, and would further applicable City and SCAG land use, economic, and environmental goals, objectives, and policies. As such, the benefits of the Project, as outlined above, would outweigh the effects of the significant and unavoidable Project-level and cumulative impacts of the Project, all of which are construction-related noise and vibration impacts.

3. Significant Irreversible Environmental Changes

CEQA Guidelines Section 15126.2(c) indicates that an EIR should evaluate significant irreversible environmental changes that would be caused by implementation of a proposed project. As stated in CEQA Guidelines Section 15126.2(c), “[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

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

a. Building Materials and Solid Waste

Construction of the Project would require building materials, including some that do not replenish themselves or 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).

However, the Project's consumption of these materials would be miniscule in comparison to the total amount of these materials used in the City of Los Angeles and the greater Southern California area and would not deprive others of such materials which are readily available and practically unlimited in supply. Furthermore, the use of these materials would not occur in an inefficient or wasteful manner given that Project construction would adhere to the sustainability requirements of Title 24, the Los Angeles Green Building Code, and CALGreen.

The Project's potential impacts related to solid waste are addressed in the Initial Study prepared for the Project, which is included in Appendix A of this Draft EIR. As discussed therein, 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. After accounting for mandatory recycling, Project construction would result in a total of approximately 340 tons of construction-related waste in the County's permitted inert landfill (i.e., Azusa Land Reclamation Landfill) throughout the construction period, which represents approximately 0.001 percent of the Azusa Land Reclamation Landfill's existing remaining disposal capacity. Thus, the total amount of construction and demolition waste generated by the Project would represent a small fraction of the remaining capacity at this permitted inert landfill serving Los Angeles County.

During operation, the Project would adhere to resource conservation measures, adopt recycling practices, and provide for organic waste recycling in accordance with Assembly Bill (AB) 939, AB 341, and AB 1826, respectively. The Project would also comply with the City's Space Allocation Ordinance, which requires development projects to include an on-site recycling area or room and provide clearly marked source-sorting receptacles to facilitate recycling to comply with State diversion requirements (e.g., AB 939, AB 341, and AB 1826). As analyzed in the Initial Study prepared for the Project, upon full buildout, the Project would result in a net increase in solid waste generation of 730 tons per year, represents approximately 0.0004 percent of the remaining capacity of the County's Class III landfills open to the City of Los Angeles. This estimate of solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures described above. Thus, the Project would not result in the inefficient or wasteful use of building materials during either Project construction or operation.

b. Water

Consumption of water during construction and operation of the Project is addressed in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. As evaluated therein, Project construction activities would require water for dust control, cleaning of equipment, excavation/export, and removal and re-compaction. Based

on a review of construction projects of similar size and duration, a conservative estimate of water use during Project construction ranges from 1,000 to 2,000 gallons per day (gpd). Thus, Project construction-related water use would be minimal and temporary and would be less than the net new operational water consumption estimated for the Project at buildout.

During operation, the Project would result in an increase in long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. Assuming constant water use throughout the year, the Project would result in a net average daily water demand of 83,949 gpd, or 94 acre-feet per year (afy). 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 Availability Will Serve letter provided by LADWP and included as Exhibit 1 of the Water Utility Report, included in Appendix K of this Draft EIR. 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. Furthermore, the Project would be consistent with SCAG RTP/SCS growth projections, and the Project's water demand would be within the LADWP 2015 UWMP's 25-year water demand projections. Lastly, Project operational water use would occur in accordance with all applicable water conservation requirements, including City of Los Angeles Ordinance No. 184248, the 2020 Los Angeles Plumbing Code, and the 2020 Los Angeles Green Building Code, and with the additional water conservation measures outlined in Project Design Feature WAT-PDF-1.

Thus, as evaluated in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, while construction and operation of the Project would result in some irreversible consumption of water, the Project would not utilize water in an inefficient or wasteful manner or result in significant impacts related to water supply.

c. Energy Consumption

The Project would consume energy during construction and operation activities. Sources of energy for these activities would include electricity usage, natural gas consumption (during operation only), and transportation fuels such as diesel and gasoline. 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 construction vehicles would consume an estimated 24,038 gallons of gasoline and approximately 186,120 gallons of diesel fuel throughout the Project's estimated 26-month construction period. For comparison purposes, transportation fuel usage during Project construction would represent approximately 0.002 percent of the gasoline usage and 0.02 percent of the diesel usage within Los Angeles County for the buildout year (i.e.,

2025).³ In addition, as detailed in Section IV.C, Energy, of this Draft EIR, a total of approximately 21,962 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, construction of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources.

During operation, the Project's increase in electricity and natural gas demand would be within the anticipated service capabilities of LADWP and the Southern California Gas Company (SoCalGas), respectively. Specifically, the Project's electricity and natural gas demand would represent approximately 0.01 percent of LADWP's projected sales in 2025 and approximately 0.005 percent of the 2025 forecasted consumption in SoCalGas' planning area. In addition, as discussed in Section IV.C, Energy, of this Draft EIR, the Project would comply with Title 24 standards and applicable CALGreen requirements. Gasoline and diesel fuel consumption during operation are estimated to be 221,739 gallons and 35,897 gallons per year, respectively, or a total of 257,636 gallons of petroleum-based fuels consumed per year. This would account for approximately 0.006 percent of gasoline and diesel fuel consumption in Los Angeles County. In addition, the nature of the Project as a mixed-use development within a TPA and an HQTAs would serve to reduce VMT and associated transportation fuel usage within the region. Implementation of TDM strategies (e.g., bicycle parking and reducing vehicle parking), as outlined in Section IV.I, Transportation, of this Draft EIR, and project features (e.g., electric vehicle (EV) charging equipment) discussed in Section IV.E, Greenhouse Gas Emission, of this Draft EIR, would also serve to reduce transportation fuel consumption.

Overall, the Project would not result in potentially significant environmental impacts due to the wasteful, inefficient, and unnecessary consumption of energy resources during construction or operation. The Project's energy requirements would not significantly affect local and regional supplies or capacity. The Project's energy usage during peak periods would be consistent with electricity and natural gas future projections for the region. Electricity generation capacity and supplies of natural gas and transportation fuels would be sufficient to meet the needs of Project-related construction and operational activities. During construction, the Project would comply with on-road fuel economy Title 24 energy efficiency standards, where applicable, resulting in efficient use of energy. During

³ Refer to Appendix D of this Draft EIR for detailed energy calculations.

operations, the Project would comply with applicable energy efficiency requirements, including California Title 24, CALGreen Code, and the City of Los Angeles Green Building Code. The Project would also include project design features that would improve energy efficiency, as outlined in Section IV.E, Greenhouse Gas Emissions, and Section IV.K.1-1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. Therefore, based on the above, the Project would not cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F to the CEQA Guidelines. In addition, Project operations would not conflict with adopted energy conservation plans. Refer to Section IV.C, Energy, of this Draft EIR, for further analysis regarding the Project's consumption of energy resources.

d. Environmental Hazards

The Project's potential use of hazardous materials is addressed in the Initial Study for the Project, included in Appendix A of this Draft EIR, and summarized below. As evaluated therein, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used in residential and commercial developments. Specifically, operation of the Project would be expected to involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, paints, and those used for maintenance and landscaping. Construction of the Project would also involve the temporary use of potentially hazardous materials, including fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners. 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 be consistent with regional and local growth forecasts and development goals for the area and would not be considered substantial. In addition, 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 wastewater 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 the construction of 270 new multi-family residential units (including 27 affordable housing units) and 6,790 square feet of ground floor commercial space. Based on a rate of 2.25 persons per multi-family unit and 3.14 persons per affordable housing (family) unit based on the City of Los Angeles VMT Calculator Documentation,⁴ development of 243 market-rate units and 27 affordable units would result in an increase of approximately 632 new residents. According to SCAG's 2020–2045 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2020 is approximately 4,049,317 persons.⁵ As projected by the 2020–2045 RTP/SCS, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,193,714 persons in 2025, the projected occupancy year of the Project.⁶ Therefore, the projected population growth between 2020 and 2025 is approximately 144,397 persons. The estimated 632 new residents generated by the Project would represent approximately 0.44 percent of the population growth forecasted by SCAG's 2020–2045 RTP/SCS in the City of Los Angeles. Therefore, the Project's

⁴ *City of Los Angeles VMT Calculator Documentation, Table 1, May 2020.*

⁵ *Based on a linear interpolation of SCAG 2016–2045 data.*

⁶ *Based on a linear interpolation of SCAG 2016–2045 data.*

residents would be well within SCAG's 2020–2045 population projection for the City of Los Angeles Subregion.

b. Employment

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

During construction, the Project would create temporary construction-related jobs. However, the work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, construction workers would not be expected to relocate to the Project vicinity as a direct consequence of working on the Project. Therefore, given the availability of construction workers, 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, the Project's 6,790 square feet of new commercial space and occupancy of the 4,000 square feet of floor area within the existing buildings that has been vacant since prior to 2018, would generate approximately 43 new employees on the Project Site.⁷ Based on a linear interpretation of employment data from the 2020–2045 RTP/SCS, an estimated 1,937,555 employees are projected within the City of Los Angeles in 2025, the Project's buildout year, with 49,586 new employees between 2020 and 2025. The Project's net increase of 43 employees would represent 0.002 percent of the total number of projected employees in 2025 and 0.09 percent of the growth between 2020 and 2025. As such, the Project would not cause an exceedance of SCAG's employment projections contained in the 2020–2045 RTP/SCS.

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

⁷ *City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. Conservatively assumes that all new and currently vacant commercial space would be occupied by high-turnover restaurant uses.*

opportunities offered by the Project would be filled by persons moving into the surrounding area, which could increase demand for housing, it is anticipated that most of this demand would be filled by then-existing vacancies in the housing market and others by any new residential developments that may occur in the vicinity of the Project Site, including the Project. As such, the Project's commercial 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 developed with a mix of commercial/retail (including tourist and entertainment-related uses), offices, hotels, educational institutions, and single- and multi-family residential uses. The area is highly urban and is currently served by existing utilities and infrastructure. While the Project would require local infrastructure upgrades to maintain and improve water, sewer, electricity, natural gas, and telecommunication 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. Only the issue areas that include mitigation measures are listed.

a. Geology and Soils—Paleontological Resources

Mitigation Measure GEO-MM-1 sets forth steps that must be taken in the event that any prehistoric subsurface cultural resources are inadvertently encountered during Project construction or in the course of any ground disturbance activities. This mitigation measure involves the assessment of the find and measures that must be followed should paleontological resources be discovered. This mitigation measures represents procedural actions that would be beneficial in avoiding or mitigating potential impacts to paleontological resources. Thus, implementation of Mitigation Measures GEO-MM-1 would not result in adverse secondary impacts.

b. Noise

Mitigation Measure NOI-MM-1 requires temporary and impermeable sound barriers to be erected during construction along the northern property line of the Project Site between the construction areas and the Triangle Square Apartments (receptor location R1), the Cosmo Lofts (receptor location R6), and the Sound Factory recording studio (receptor location R7);⁸ and along the eastern property line of the Project Site between the construction areas and the Triangle Square Apartments (receptor location R1) and the Los Angeles Film School (receptor location R2). The noise and vibration from installation of the temporary sound barrier would be short-term and would be required to comply with the City's noise thresholds as described in Section IV.G, Noise, of this Draft EIR. In addition, upon completion of construction, the temporary sound barrier would be removed. As such, implementation of Mitigation Measure NOI-MM-1 would not result in adverse secondary impacts.

Mitigation Measure NOI-MM-2 requires the establishment and implementation of a vibration monitoring program to record and document the construction-related ground vibration levels at the single-story commercial building adjacent to the Project Site to the northwest during demotion, shoring, and excavation. In the event the warning level (i.e., 0.25 inch/section [PPV]) is triggered, feasible steps would be taken to reduce the level (e.g., staggering activities and utilizing lower vibratory techniques). In the event the

⁸ As noted above and in Section IV.G, Noise, of this Draft EIR, although recording studio uses are not defined as noise sensitive receptors by the L.A. CEQA Thresholds Guide, potential noise impacts at the nearest recording studios, including the Goya Studios located at 1541 Cahuenga Boulevard (represented by receptor location R4) and the Sound Factory located at 6357 Selma Avenue (represented by receptor location R7), were evaluated for informational purposes only.

regulatory level (i.e., 0.3 inch/second [PPV]) is triggered, construction in the vicinity of the building would be halted, the building would be visually inspected, and feasible steps would be taken reduce vibration levels. A follow-up letter describing damage to the buildings, if any, and recommendations for repair, as may be necessary. The vibration monitoring system typically includes a sensor and a vibration meter that would be placed in the designated location. No construction or permanent alternations to the surroundings would be required and no adverse secondary impacts would occur. This mitigation measure would be beneficial in reducing the Project's construction vibration (building damage) impact to the adjacent building to a less than significant level. As such, implementation of Mitigation Measure NOI-MM-2 would not result in adverse secondary impacts.

c. Biological Resources

Mitigation Measure BIO-MM-1, which is outlined below, includes requirements that would ensure that bats or other protected species would not be directly or indirectly impacted by the Project. This measure involves procedural requirements including surveys, temporary pauses in work, and adherence to regulatory requirements. As such, implementation of Mitigation Measure BIO-MM-1 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 impact 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 (pursuant to SB 743); agriculture and forestry resources; objectionable odors; biological resources; geology and soils (fault rupture, strong seismic ground shaking, liquefaction, landslides, soil erosion, lateral spreading, subsidence, collapse, expansive soils, and soils incapable of supporting septic tanks); hazards and hazardous materials; hydrology and water quality; physical division of an established community; mineral resources; airport and airstrip noise; population and housing; schools; emergency access; stormwater drainage facilities; telecommunications facilities; solid waste; and wildfire. A summary of the analysis provided in the Project's Initial Study for these issue areas is provided below.

In addition, subsequent to the publication of the Initial Study, it was determined that, in order to conservatively analyze the potential impacts of the Project, future occupancy of 4,000 square feet of floor area that has been vacant since prior to 2018 should be

considered as part of the Project. Thus, a new request for a Wastewater Service Information (WWSI) response was sent to the City of Los Angeles Bureau of Sanitation (LASAN) to account for the entirety of new and newly occupied square footage on the Project Site. Accordingly, impacts associated with wastewater were analyzed in this Draft EIR (see Section IV.K-2, Utilities—Wastewater, of this Draft EIR).

a. Aesthetics

Pursuant to SB 743 [Public Resources Code (PRC) Section 21099(d)] and the City's Zone Information (ZI) File No. 2452, the Project's aesthetic impacts shall not be considered significant impacts on the environment. Specifically, pursuant to PRC Section 21099, the Project is a mixed-use residential project located on an infill site. The Project Site is also located within a TPA because it is located within 0.5 mile of an existing "major transit stop." In particular, the Project Site is located within one-half mile of the Metro B Line Hollywood/Vine rail station. ZI File No. 2452 also confirms the Project Site's location within a TPA. Therefore, as discussed in the Initial Study, pursuant to SB 743 and ZI File No. 2452, aesthetic impacts, including impacts related to scenic vistas, scenic resources, visual character or quality, shading, light, and glare, are not considered significant. Refer to the Initial Study included in Appendix A of this Draft EIR, for a discussion of these potential impact area, which was provided for informational purposes only.

b. Agricultural and Forest Resources

The Project Site is located in an urbanized area of the City of Los Angeles and is currently occupied by a surface parking area located in the northeast portion of the Project Site (Development Area) and six one- and two-story commercial structures located in the southern and western portions of the Project Site. 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. As such, the Project would not convert farmland to a non-agricultural use, conflict with any zoning for agricultural uses or a Williamson Act Contract, conflict with existing zoning for, or cause rezoning of, forest land or timberland, result in the loss or conversion of forest land, or result in the conversion of farmland to non-agricultural use or in the conversion of forest land to non-forest use. No impacts to agriculture and forestry resources would occur.

c. Air Quality (Odors)

No objectionable odors are anticipated as a result of either construction or operation of the Project. 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, the

Project would not include land uses that are associated with odor complaints, as outlined in the SCAQMD *CEQA Air Quality Handbook*. 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, construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403 regarding visible emissions violations. Thus, the Project would not create odors that would adversely affect a substantial number of people, and impacts would be less than significant.

d. Biological Resources

The Project Site is located in an urbanized area and is occupied by a surface parking area and commercial structures. The Development Area contains limited ornamental landscaping consisting of 12 olive trees located within the existing surface parking area. In addition, two magnolia trees are located within the public right-of-way adjacent to the Development Area along Selma Avenue and six queen palm trees are located within the public right-of-way adjacent to the overall Project Site (but not adjacent to the Development Area) along Cahuenga Boulevard. The Project would involve the removal of the 12 on-site trees.

Due to the urbanized and developed setting of the Project Site, species that could potentially occur on-site would likely be limited to small terrestrial and avian species typically found in developed settings, such as bats, which sometimes use trees and man-made structures for roosting. Construction activities, including ground disturbance, vegetation removal, and increased noise and light levels could have direct and/or indirect impacts on urban species, including bats and their roosts. In response to a comment letter from the California Department of Fish and Wildlife (CDFW) received during the Notice of Preparation (NOP) process, further evaluation of the Project's potential impacts to bats during construction of the Project was conducted. To that end, a Bat Habitat Assessment was conducted by GPA Consulting, which is included as Appendix L of this Draft EIR.⁹ As detailed therein, a search in the California Natural Diversity Database (CNDDDB) showed that seven bat species have been recorded within ten miles of the Project Site. In addition, according to iNaturalist,¹⁰ a western red bat (*Lasiurus blossevilli*) was observed two blocks east of the Project Site. As detailed in the Bat Habitat Assessment, a daytime bat survey was conducted during the bat maternity season (generally April 1 through September 15), when bats are typically easier to detect. The survey area included the entire Project Site,

⁹ GPA Consulting, *Memorandum: Bat Habitat Assessment for the Artisan Hollywood Project*, December 8, 2021.

¹⁰ *iNaturalist* is an online resource where users record and share observations of plant and animal species. It is a joint initiative by the California Academy of Sciences and the National Geographic Society.

consisting of the Development Area and the existing on-site commercial buildings; all trees within and adjacent to the Project Site, as identified above; sidewalk areas adjacent to the Project Site; and an approximate 100-foot buffer around the Project Site. No bats or evidence of bats were observed within the study area during the bat survey, including within or below the on-site trees or adjacent street trees, within the existing on-site buildings, or within the buffer area. Furthermore, there is no suitable bat roosting habitat within the Development Area. Suitable bat roosting habitat was observed in the magnolia trees along Selma Avenue and the queen palms along Cahuenga Boulevard. However, this habitat is of marginal quality as it is exposed and low to the ground, offering no cover from predators or human disturbance. Additionally, the trees are well maintained, with no peeling bark, holes, or hanging/dead fronds, which provide shelter and cover for bats. As such, it was concluded in the Bat Habitat Assessment that the potential for bats to roost in these trees is low. In addition, while not part of the Development Area, suitable bat roosting habitat, such as joints or crevices, was also not observed on the on-site buildings. Thus, as no bats have been observed or documented on the Project Site or within the buffer area during the Bat Habitat Assessment, and roosting opportunities are of marginal quality, it is unlikely that bat species would be encountered during Project construction.

Nonetheless, the following mitigation measure is proposed to ensure that potential construction-related impacts to bats and roosts (or other protected species) would be less than significant:

BIO-MM-1: To avoid and/or minimize potential direct and indirect impacts on bats or other protected species, the following measures shall be implemented:

- Direct Impacts: Prior to tree removal activities, a qualified biologist will survey the on-site trees that are to be removed to determine if bats, roosts, or other protected species are present.
 - If bats are detected roosting in any of the trees to be removed, tree removal work will halt and the bats will be allowed to leave by their own volition before the trees are removed. Tree removal activities shall resume when it has been determined by a qualified biologist that no bats remain in the on-site trees.
 - If other protected species or active nests are detected in any of the trees to be removed, the Project would adhere to all applicable regulations regarding taking and possession of such species, including the California Fish and Game Code, the California Code of Regulations, and the Migratory Bird Treaty Act.
- Indirect Impacts: During tree removal activities, a qualified biologist shall be on-site to ensure that bats or other protected species, if present within the trees located within the public rights-of-way

along Selma Avenue and Cahuenga Boulevard adjacent to the Project Site, are not indirectly impacted from adjacent noise and vibration.

- If bats are detected being flushed from roosts in any of the street trees during tree removal, work will halt and the bats will be allowed to leave by their own volition before additional trees are removed. Tree removal activities shall resume when it has been determined by a qualified biologist that all bats have left the trees.
- If other protected species or active nests are found to be indirectly impacted by Project construction, the Project would adhere to all applicable regulations regarding taking and possession of such species, including the California Fish and Game Code, the California Code of Regulations, and the Migratory Bird Treaty Act.

Thus, with implementation of Mitigation Measure BIO-MM-1, 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 CDFW or U.S. Fish and Wildlife Service (USFWS). Impacts to any special species would be less than significant with mitigation incorporated.

Additionally, there are no riparian habitat or other sensitive natural community on the Project Site or in the immediate area. Thus, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community, and no impacts would occur.

Similarly, no water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site or in the immediate vicinity of the Project Site. Thus, the Project would not have an adverse effect on federally protected wetlands, and no impact would occur.

As the areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within or surrounding the Project Site that provide linkages to natural open space areas and that may serve as wildlife corridors, development of the Project would not interfere substantially with an established native resident or migratory wildlife corridors. As discussed above, the Project would involve the removal of the 12 olive trees within the existing surface parking area to allow for development of the Project, which could potentially provide nesting sites for migratory birds. The Project would be required to comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms

of a valid permit issued pursuant to federal regulations. Additionally, California Fish and Game Code Section 3503 states that “[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.” To ensure regulatory compliance with the Migratory Bird Treaty Act and California Fish and Game Code, tree removal activities associated with the Project would take place outside of the nesting season (February 1–August 31), to the extent feasible.¹¹ Should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and would be based on the professional judgment of the monitoring biologist, in coordination with the CDFW. In addition, as discussed above, should a protected species such as bats be encountered during Project construction, the Project would adhere to all applicable regulations, including the California Fish and Game Code and the California Code of Regulations, so as to avoid direct or indirect impacts. Thus, with compliance with the Migratory Bird Treaty Act, the California Fish and Game Code, and the California Code of Regulations, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Thus, impacts would be less than significant.

The Project would not involve the removal of any trees considered protected under the City of Los Angeles Protected Tree and Shrub Relocation and Replacement Ordinance (Ordinance No. 177,404, as amended by Ordinance No. 186,873). To allow for development of the Project, 12 existing olive trees located within the development portion of the Project Site would be removed. These onsite trees to be removed would be replaced at a 1:1 ratio in accordance with Department of City Planning policy. The two magnolia trees located in the City right of way along Selma Avenue are proposed to be maintained and protected during construction of the Project, using standard tree protection practices and measures. If it is subsequently determined that it is not feasible to maintain these trees during Project construction, removal of these trees would be required to comply with the City’s street tree removal procedures, provide replacement trees in accordance with the City’s current guidelines and policies, and receive approval from the City’s Board of Public Works. The six queen palm trees located adjacent to the overall Project Site along Cahuenga Boulevard are not adjacent to the Development Area and would not be impacted. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources, and impacts would be less than significant.

¹¹ *The Project would comply with the State Migratory Bird Treaty Act (MBTA). Per AB 454, the federal MBTA authorizes states and territories to enforce laws or regulations that further protect migratory birds and their nests.*

Lastly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans, and no impacts would occur.

e. Geology and Soils¹²

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

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

The Project Site is not located in an area that has been identified by the State or the City of Los Angeles as being potentially susceptible to liquefaction. The Geotechnical Investigation included as Appendix IS-2 of the Initial Study found that due to the depth of the historical highest groundwater level, the type of soils underlying the Project Site, and the liquefaction mapping by the City and State, the liquefaction potential for the Project Site is low. As such, the Initial Study concluded that impacts associated with liquefaction would be less than significant.

The Project Site and surrounding area are fully developed and characterized by relatively flat topography, which precludes both stability problems and the potential for lurching. Furthermore, the Project Site is not located in a landslide area as mapped by the State. Further, the development of the Project does not propose substantial alteration to the existing topography. As such, the Initial Study concluded that impacts from landslides and lateral spreading would be less than significant.

Project construction activities, including grading and excavation, have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. However, with implementation of standard erosion controls imposed during

¹² *Potential impacts associated with paleontological resources are analyzed in Section IV.D, Geology and Soils—Paleontological Resources, of this Draft EIR.*

site preparation and grading activities, including the implementation of Best Management Practices (BMPs), impacts related to soil erosion during Project construction would be less than significant. During Project operation, the soil erosion potential is low since the Project Site would be fully developed. Therefore, with compliance with applicable regulatory requirements, impacts regarding soil erosion and the loss of topsoil would be less than significant.

No large scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the Project Site or in the general vicinity of the Project Site. Therefore, there is minimal to no potential for ground subsidence due to withdrawal of fluid or gas at the Project Site. Thus, impacts related to subsidence would be less than significant.

With regard to collapsible soils, the soils underlying the Project Site indicate medium dense to very dense silty sands, clayey sand, and sandy clay. Due to the type and density of the soils underlying the Project Site, the Project Site soils would not be considered collapsible soils. Therefore, the Project Site is not located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in collapse. Impacts associated with collapsible soils would be less than significant.

Expansive soils are typically associated with clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. The alluvial soils at the Project Site are anticipated to be predominately sands with lesser silts and clay and, hence, to be primarily of low expansion potential. However, moderately expansive soils could be locally present. As discussed in the Initial Study, should expansive soils be identified during geotechnical design reports, impacts would be addressed using standard geotechnical design practices (i.e., removal and replacement with non-expansive engineered fill, the use of soil improvement techniques, such as lime treatment, or by obtaining foundation support below the zone of seasonal moisture variation). Furthermore, construction of the Project would be required to comply with the current California Building Code and supplemental requirements of the LAMC, as enforced by the City of Los Angeles through the building permit process. Therefore, with implementation of the recommendations set forth in the Geotechnical Evaluation into the design of the Project, the Project would not exacerbate existing environmental conditions that could create substantial risk to life or property due to expansive soils. Impacts would be less than significant.

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

f. Hazards and Hazardous Materials

The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used for residential and commercial uses. Specifically, operation of the proposed uses would be expected to involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and petroleum products. Construction of the Project would also involve the temporary use of potentially hazardous materials, including fuel and oils associated with construction equipment, coatings, paints, adhesives, and cleaners. However, all potentially hazardous materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated potential risk would be adequately reduced to a less than significant level through compliance with these standards and regulations. Consequently, impacts related to the routine transport, use, or disposal of hazardous materials during construction and operation of the Project would be less than significant.

The Phase I ESA prepared for the Project, which is included as Appendix IS-4 of the Initial Study, included a review of environmental records for the Project Site and a site reconnaissance to identify potential on-site hazards. The Phase I ESA did not identify any Recognized Environmental Conditions (RECs) on-site. Furthermore, no evidence of existing underground storage tanks (USTs) was observed on the Project Site. An aboveground storage tank (AST) comprised of an approximately 100-gallon tank for waste cooking oil and grease associated with the existing restaurant use within the commercial buildings that will remain is stored on concrete in the southern exterior portion of the Project Site. No evidence of staining or past releases from the tank were observed at the time of the site visit and no environmental hazards are associated with the AST. It is possible that a future restaurant on the Project Site would also include an AST for cooking oil or grease. However, like the existing AST, it would be operated and maintained in accordance with manufacturer's specifications. Thus, the Project would not exacerbate hazardous conditions related to risk of upset associated with exposure to USTs or ASTs.

Based on the age of the existing buildings on-site, there is a possibility that asbestos-containing materials (ACMs) and lead-based paint (LBP) are present. The on-site buildings would not be demolished as part of the Project. However, in the event that ACMs or LBPs are encountered within areas proposed for demolition (i.e., within the Project Site's existing surface parking area), the Project would adhere to all federal, State, and local regulations prior to their removal. These regulations include, but are not limited to, the Toxic Substances Control Act (TSCA), the Resource Conservation and Recovery Act (RCRA), the federal and State Occupational Safety and Health Acts, SCAQMD Rule 1403 pertaining to asbestos emissions from renovation/demolition activities, and the Residential Lead-Based Paint Reduction Act. With compliance with relevant regulations

and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers or LBP into the environment. Therefore, the Project would not exacerbate environmental hazards related to risk of upset associated exposure of people to ACMs or LBP.

Regarding polychlorinated biphenyls (PCBs), typical sources of PCBs include electrical transformer cooling oils, fluorescent light fixture ballasts, and hydraulic oil. In 1976, the USEPA banned the manufacture and sale of PCB-containing transformers. In the event that PCBs are found within areas proposed for demolition (i.e., within the Project Site's existing surface parking areas), suspect materials would be removed in accordance with all applicable federal, state, and local regulations. Therefore, the Project would not exacerbate reasonably foreseeable upset and accident conditions associated with PCBs.

A review of the State of California Geologic Energy Management Division (CalGEM) Well Finder determined that the Project Site does not contain any oil wells.¹³ Based on the City's General Plan Safety Element, the Project Site is not located within an oil field or oil drilling area in the City.¹⁴ The Project Site is also not found to be located within a designated Methane Zone or Methane Buffer Zone mapped by the City.¹⁵ Therefore, the Project would not exacerbate environmental hazards relative to oil wells or methane.

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

There are no schools located within a 0.25-mile radius of the Project Site. The nearest school is Selma Avenue Elementary located approximately 0.3 mile northwest of the Project Site. Furthermore, as discussed above, the types and amounts of hazardous materials that would be used in connection with construction and operation of the Project would be typical of those used during construction and operation of residential and commercial developments and would be consistent with other potentially hazardous materials currently used in the vicinity of the Project Site. All potentially hazardous

¹³ CalGEM GIS, <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.32935/34.09866/19>, accessed June 3, 2020.

¹⁴ Los Angeles General Plan Safety Element, November 1996, Exhibit E, Oil Field & Oil Drilling Areas, p. 55.

¹⁵ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5546012009, 5546012004, 5546012005, 5546012006, and 5546012002, <http://zimas.lacity.org/>, accessed June 1, 2020.

materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, including, but not limited to, federal and State Occupational Safety and Health Act requirements. As such, impacts associated with hazards within 0.25 mile of an existing school would be less than significant.

The Project Site was not listed on any of the standard regulatory databases searched when the Phase I ESA was conducted, including those compiled pursuant to Government Code Section 65962.5. The nearest listed contaminated site to the Project Site is directly south of the Project Site at 6409 Sunset Boulevard (approximately 300 feet south of the Development Area), which is a former gas station that underwent remediation and cleanup under regulatory oversight resulting in a closure action in 1996. While unlikely, any remaining contamination would be localized and unlikely to migrate at significant levels onto the Project Site. Additionally, this location is located in the presumed downgradient direction from the Project Site's Development Area, which further reduces the potential for any migration onto the Project Site. Thus, this closed site does not appear to represent a significant concern to the Project Site. In addition, the Project Site is located adjacent to a number of properties listed on the EDR Historic Dry Cleaner and Historic Gas Stations databases. The properties listed are not listed on any other databases indicative of a release and based on available information, there is no indication that contamination from the properties has migrated to the Project Site. Additionally, if any releases have occurred on adjacent or upgradient properties that may migrate to the Project Site, such releases do not present a vapor intrusion concern to future occupants of the Project Site based on the results of a shallow soil vapor survey performed in September 2017. Thus, the Project would not have the potential to exacerbate current environmental conditions related to listing on a hazardous materials site. Impacts related to creating a hazard to the public or the environment would be less than significant.

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

According to the Safety Element of the City of Los Angeles General Plan, the nearest disaster routes to the Project Site are the US-101, which is approximately 0.70 mile east (and approximately 0.5 mile north) of the Project 0.5, and Santa Monica Boulevard, which is approximately 0.55 mile south of the Project Site. While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with the Project's Construction Traffic Management Plan prepared pursuant to Project Design Feature TR-PDF-2, outlined in Section IV.I, Transportation, of this Draft

ERI, that would be implemented to ensure adequate circulation and emergency access. Operation of the Project would generate traffic in the Project vicinity and would result in some modifications to site access. However, the Project would comply with Los Angeles Fire Department (LAFD) access requirements and would not impede emergency access within the Project vicinity. Thus, as discussed in the Initial Study, impacts related to implementation of an adopted emergency response plan would be less than significant.

Lastly, there are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone¹⁶ or a City-designated fire buffer zone.¹⁷ Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. Additionally, the proposed residential and commercial uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Impacts would be less than significant. Therefore, the Project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. As such, the Initial Study concluded that impacts related to wildland fires would be less than significant.

g. Hydrology and Water Quality

During construction of the Project, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use, and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. Therefore, Project-related construction activities could potentially result in adverse effects on water quality. As Project construction would disturb less than 1 acre of soil, the Project would not be required to file a Stormwater Pollution Prevention Plan (SWPPP) with the State but would be required by the City of Los Angeles to put in place an erosion control plan (Local SWPPP) for the full duration of Project construction activities. The Local SWPPP would consist of construction BMPs to minimize the discharge of pollutants in stormwater runoff, which would be implemented when construction commences, prior to site clearing and grubbing or demolition activities. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC),

¹⁶ *City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5546012009, 5546012004, 5546012005, 5546012006, and 5546012002, <http://zimas.lacity.org/>, accessed June 1, 2020.*

¹⁷ *City of Los Angeles General Plan Safety Element, November 1996, Exhibit D, Selected Wildfire Hazard Areas, p. 53.*

such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Based on groundwater levels beneath the Project Site and proposed excavation depths, construction activities are not expected to encounter groundwater. Nonetheless, if groundwater is encountered, temporary pumps and filtration would be utilized in compliance with relevant National Pollutant Discharge Elimination System (NPDES) requirements related to construction and discharges from dewatering operations. Furthermore, if dewatering is required, the treatment and disposal of the dewatered water would occur in accordance with the Los Angeles Regional Water Quality Control Board (LARWQCB) Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. With compliance with these existing regulatory requirements, impacts to water quality during construction would be less than significant.

Operation of the Project could introduce sources of potential stormwater pollution that are typical of residential and retail uses (e.g., sediment, nutrients, pesticides, metals, pathogens, and oil and grease). Stormwater runoff from precipitation events could potentially carry urban pollutants into municipal storm drains. However, implementation of BMPs required by the City's Low Impact Development (LID) Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Furthermore, operation of the Project would not result in discharges that would cause regulatory standards to be violated. The existing site is approximately 100-percent impervious and consists of buildings, paved surface lots, and minimal landscape areas. Implementation of the Project would decrease the impervious surfaces to approximately 87 percent. As discussed in the Hydrology Report included as Appendix IS-5 of the Initial Study, a catch basin is located at the southern end of the valley gutter, which collects and discharges the stormwater under the public sidewalk to the curb face with no means of treatment. However, the Project will manage stormwater flows to drains, which would be directed to the on-site storage tank or filtration planter, which would control stormwater runoff with no increase in runoff resulting from the Project. Therefore, with the incorporation of such LID BMPs and other existing regulatory requirements, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. Impacts to surface water quality during operation of the Project would be less than significant.

With regard to groundwater quality, the historically highest groundwater level in the area is 60 to 80 feet below ground surface (bgs). Anticipated excavation depths up to 50 feet bgs would occur to provide for the new subterranean parking levels. Considering the historic high groundwater level and the depth of the excavation, Project construction activities are not expected to encounter groundwater and temporary dewatering is not anticipated. In the event groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable NPDES requirements. In addition, as there are no groundwater production wells or supply wells within one mile of the Project Site, construction activities would not be anticipated to affect

existing wells. During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives could be used and would therefore require proper management and disposal to decrease the opportunity for hazardous materials releases into groundwater. Compliance with all applicable federal, State, and local requirements concerning the handling, storage, and disposal of hazardous waste, such as the Local SWPPP, would reduce the potential for the construction of the Project to release contaminants into groundwater. Thus, construction of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements. Therefore, construction-related impacts on groundwater quality would be less than significant.

Operational activities from a development project that could affect groundwater quality are typically spills of hazardous materials and leaking USTs. Surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner, thereby resulting in little threat to groundwater. Furthermore, as discussed above, the Project would not include any new USTs that would have the potential to expose groundwater to contaminants. In addition, while the development of the Project would increase the use of on-site hazardous materials as described above, compliance with all applicable existing regulations at the Project Site regarding the handling and potentially required cleanup of hazardous materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Furthermore, as described above, operation of the Project would not require extraction from the groundwater supply based on the depth of excavation for the proposed uses and the depth of groundwater below the Project Site. The Project also does not include the installation or operation of water wells, or any extraction or recharge system. As such, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade ground water quality. The Project's potential impact on groundwater quality during operation would be less than significant.

With regard to groundwater recharge, no water supply wells are located on or within one mile of the Project Site that could be impacted by construction, nor would the Project include the construction of water supply wells. In addition, as discussed above, dewatering is not anticipated during construction activities for the Project. However, if dewatering is required, due to the limited and temporary nature of dewatering operations, impacts to groundwater supplies and management of the basin would not be considered significant. Furthermore, the Project Site is currently virtually 100-percent impervious with minimal groundwater recharge potential. At buildout, the Project Site would be approximately 87-percent impervious. Thus, the potential for groundwater recharge would be improved. Furthermore, the Project's BMPs would control stormwater runoff with no increase in runoff

resulting from the Project. Therefore, construction and operation 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. Thus, impacts on groundwater supplies would be less than significant.

Construction activities associated with the Project have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. However, as discussed above, the Project would implement a Local SWPPP that would outline BMPs and erosion control measures to be used during construction to manage runoff flows. These BMPs would be designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. In addition, Project construction activities would occur in accordance with City grading permit regulations that require measures, plans, and inspections to reduce sedimentation and erosion. At buildout of the Project, the Project Site would be comprised of approximately 87-percent impervious areas. While there would be an incremental increase in the imperviousness of the Project Site, this increase would not significantly increase the potential for erosion or siltation to occur from exposed soils or large expanses of pervious areas. In addition, the Project would include BMPs that would address drainage flows and would ensure that soil erosion does not occur. Therefore, construction and operation of the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion or siltation on-site or off-site would occur. Impacts associated with erosion and siltation would be less than significant.

Compliance with applicable City grading permit regulations would also ensure that Project construction activities would not substantially alter the Project Site drainage patterns in a manner that would result in flooding on- or off-site. In addition, under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspired, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of capture and use and/or biofiltration system BMPs as established by the LID Manual. The installed BMP systems would be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. Therefore, with implementation of BMPs, operation of the Project would not increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Thus, impacts associated with flooding would be less than significant.

A comparison of the pre- and post-Project peak flow rates indicates a decrease in stormwater runoff from the Project Site. In addition, the Project Site currently does not have BMPs for the management of pollutants or runoff. The BMPs implemented as part of

the Project would control stormwater runoff and ultimately reduce or eliminate the discharge of potential pollutants from stormwater runoff. Consequently, the Project would decrease the amount of stormwater runoff discharging into the existing storm drainage infrastructure compared to existing conditions. In addition, the Project would not cause flooding during a 50-year storm event or result in a permanent adverse change to the movement of surface water 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, and 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.^{18,19} In addition, as discussed above, the Project would not cause flooding during a 50-year storm event or result in a permanent adverse change to the movement of surface water on the Project Site. Thus, the Project would not impede or redirect flood flows and no impacts would occur.

Based on the above, through compliance with all applicable NPDES requirements, preparation of a Local SWPPP, and implementation of BMPs, as well as compliance with applicable City grading regulations, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion, siltation, or on-site or off-site flooding would occur. Therefore, the impact would be less than significant.

The Project Site is located approximately 12.5 miles from the Pacific Ocean and is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City. In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a tsunami hazard area. Therefore, no tsunami or tsunami events would be expected to impact the Project Site. Additionally, there are no standing bodies of water near the Project Site that may experience a seiche.

Earthquake-induced flooding can result from the failure of dams or other water-retaining structures resulting from earthquakes. The Safety Element of the City of Los Angeles General Plan shows that the Project Site is located in the potential inundation

¹⁸ *Federal Emergency Management Agency, Flood Insurance Rate Maps, Panel Numbers 06037C1636G, effective December 21, 2018.*

¹⁹ *Los Angeles General Plan Safety Element, November 1996, Exhibit F, 100-Year & 500-Year Flood Plains, p. 57.*

area for the Hollywood Reservoir, which is held by the Mulholland Dam.²⁰ Dam safety regulations are the primary means of reducing damage or injury due to inundation occurring from dam failure. The Mulholland Dam, as well as others in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. In addition, LADWP operates the dams in the Project area and mitigates the potential for over flow and seiche hazard through control of water levels and dam wall height. The City's Local Hazard Mitigation Plan provides a list of existing programs, proposed activities, and specific projects that may assist the City in reducing risk and preventing loss of life and property damage from natural and human-cause hazards including dam failure. The Hazard Mitigation Plan evaluation of dam failure vulnerability classifies dam failure as a moderate risk. Given the oversight by the Division of Safety of Dams, including regular inspections, and the LADWP's emergency response program, the potential for substantial adverse impacts related to inundation at the Project Site as a result of dam failure is less than significant.

The Project Site is located within the Ballona Creek Watershed. As previously discussed, potential pollutants generated by the Project would be typical of commercial and residential land uses and may include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Since the existing Project Site does not currently have any structural or LID BMPs to treat or infiltrate stormwater, 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. As such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans for the Ballona Creek Watershed. With compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant.

h. Land Use and Planning (Community Division)

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 area with a new infill mixed-use project and would retain the six existing buildings on the Project Site. All proposed development would occur within the boundaries of the Project Site as it currently exists and the Project does not propose a

²⁰ *City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit G, November 26, 1996, p. 59.*

freeway or other large infrastructure that would divide a community. Impacts related to the physical division of an established community would be less than significant.

i. Mineral Resources

No mineral extraction operations currently occur on the Project Site. The Project Site is located within an urbanized area and has been previously disturbed by development. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.^{21,22,23} The Project Site is also not located within a City-designated oil field or oil drilling area.²⁴ Therefore, the Initial Study concluded that no impacts related to mineral resources would occur.

j. Noise (Airport and Airstrip)

The Project Site is not located within two miles of an airport or within an area subject to an airport land use plan. The closest private airstrip or airport is the Hollywood Burbank Airport, which is approximately 6.8 miles north of the Project Site. Given the distance between the Project Site and the closest private airstrip and public airport, the Project would not have the potential to expose people that reside or work in the Project Area to excessive noise levels from these sources of noise. No impacts would occur.

k. Population and Housing

The Project's development of 270 new residential units, including 27 Extremely Low Income housing units, would result in an increase of approximately 632 new residents.²⁵ The estimated 632 new residents generated by the Project would represent approximately 0.44 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2020 and 2025 (the Project's buildout year). The Project's new residential units would constitute up to approximately 0.37 percent of the housing growth

²¹ *City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.*

²² *State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.*

²³ *City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.*

²⁴ *City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit E, November 26, 1996, p. 55.*

²⁵ *Based on a rate of 2.25 persons per multi-family unit and 3.14 persons per affordable housing (family) unit based on the City of Los Angeles VMT Calculator Documentation, Table 1, May 2020.*

forecasted in SCAG's 2020–2045 RTP/SCS between 2020 and 2025 for the Subregion. Therefore, the Project's residents and households would be well within SCAG's 2020–2045 population and housing projections for the City of Los Angeles Subregion. In addition, the Project would assist the City in meeting its fair share of regional housing need, provide new housing opportunities, and conform to City and regional policies supporting higher density, compact, infill housing development in an area well-served by transit.

Based on employee generation factors from LADOT, the Project's 6,790 square feet of new commercial uses and the occupancy of the 4,000 square feet of floor area within the existing commercial buildings that has been vacant since prior to 2018 would generate approximately 43 net new employees.²⁶ The Project's 43 estimated new employees would represent approximately 0.09 percent of the employment growth forecasted between 2020 and 2025 by the 2020–2045 RTP/SCS. Therefore, the Project would not cause an exceedance of SCAG's employment projections contained in the 2020–2045 RTP/SCS.

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

As no existing housing currently exists on the Project Site, the Project would not displace any existing housing units or people that would require the construction or replacement of housing elsewhere. No impacts would occur.

I. Public Services (Schools)

As previously discussed, the Project includes the construction of 270 residential units. As outlined in the Initial Study, based on LAUSD student generation rates, the Project would result in approximately 68 elementary students, 68 middle school students, and 20 high school students in the Project area, for a total of approximately 156 students.²⁷ As such, the Project would create new demand for capacity at the LAUSD schools that serve the Project Site. It should be noted, however, that this analysis does not include

²⁶ *Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. To provide a conservative estimate, the generation rate for high-turnover restaurant (i.e., 4 persons per 1,000 square feet) was used for all of the new and vacant commercial space.*

²⁷ *Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018, Table 15.*

students who may enroll in private schools, participate in home-schooling, or opt into another LAUSD option. Pursuant to SB 50, the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of the Project's building permit. Pursuant to Government Code Section 65995, the payment of these fees fully addresses Project-related school impacts. Thus, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (i.e., schools), need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools. Therefore, the Project's impact on schools would be less than significant.

m. Transportation (Emergency Access)

While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard management plans required by LADOT to ensure adequate circulation and emergency access along the Project Site would be maintained. In addition, appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Further, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the Project would not result in inadequate emergency access. Impacts would be less than significant. With regard to operation, the Project does not propose the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from Ivar Avenue. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. Furthermore, LAMC Section 57.118 establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects. The Project would comply with these requirements of the Fire Code, as applicable. Therefore, the Project would not result in inadequate emergency access to the Project Site or surrounding uses and impacts regarding inadequate emergency access would be less than significant.

n. Utilities and Service Systems

(1) Stormwater

As previously discussed, the Project's overall percentage of impervious area is expected to decrease compared to the current condition of the Project Site. In addition, BMPs would be implemented to control runoff. Therefore, there would be no incremental

increase in runoff volumes as a result of the Project. As such, the Project would not require or result in the relocation or construction of new or expanded stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects, and impacts would be less than significant.

(2) Telecommunications Facilities

The Project Site is located in an area served by existing telecommunications infrastructure. The Project would require construction of new or extension of existing on-site telecommunications infrastructure to serve the proposed residential and commercial uses. Installation of new telecommunications infrastructure would primarily take place on-site, with minor off-site work associated with connections to the existing system. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. The Project would prepare a Construction Traffic Management Plan pursuant to Project Design Feature TR-PDF-2, 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 would be 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. Thus, the Project would not require or result in the relocation or construction of new or expanded telecommunications facilities, the construction or relocation of which could cause significant environmental effects. As such, impacts would be less than significant.

(3) Solid Waste

Construction activities would generate debris, which would be recycled to the extent feasible. Pursuant to the requirements of SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Furthermore, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. Thus, although the total diversion rate may ultimately exceed 75 percent, the analysis included in the Initial Study conservatively assumed a diversion rate of 75 percent. 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 340 tons of construction and demolition waste. This amount of construction and demolition waste would represent

approximately 0.001 percent of the Azusa Land Reclamation Landfill's existing remaining disposal capacity of 57.72 million tons. Thus, the total amount of construction and demolition waste generated by the Project would represent a small fraction of the remaining capacity at this permitted inert landfill serving Los Angeles County. Given the remaining permitted capacity at the Azusa Land Reclamation facility as well as the remaining 163.39 million tons of capacity at the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

As shown in Table VI-1 on page VI-42, upon full buildout, the Project would result in a net increase in solid waste generation of 730 tons per year. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as compliance with AB 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices.

Likewise, the analysis does not include implementation of the City's Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.²⁸ The estimated annual net increase in solid waste that would be generated by the Project of 730 tons represents approximately 0.0004 percent of the remaining capacity of the County's Class III landfills open to the City of Los Angeles.²⁹ 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.³⁰ The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant.

²⁸ *City of Los Angeles, Solid Waste Integrated Resource Plan FAQ; www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPFAQS.pdf, accessed May 7, 2020.*

²⁹ $(730 \text{ tons per year} / 163.39 \text{ million tons}) \times 100 \approx 0.0004\%$

³⁰ *Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.*

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

Building	Size	Employee Generation Rate ^a	Estimated No. of Employees	Solid Waste Generation Rate ^b	Total Generation (tons/year) ^c
Existing to be Removed					
Surface Parking Area	N/A	N/A	0	0	0
Total Existing					0
Proposed					
Residential	270 du	N/A	N/A	2.23 tones/du/yr	602
Commercial	6,790 sf	4 per ksf	27	2.98 tons/emp/yr	80
Vacant ^d	4,000 sf	4 per ksf	16	2.98 tons/emp/yr	48
Total with Implementation of Project					730
Total Net Increase (Proposed minus Existing)ⁱ					730
<hr/> <i>du = dwelling unit</i> <i>emp = employee</i> <i>lb = pound</i> <i>sf = square feet</i> <i>ksf = 1,000 square feet</i> ^a <i>Employee Generation Rates is based on the employee generation rates in City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020, and conservatively assumes that all new and currently vacant commercial space would be occupied by high-turnover restaurant uses.</i> ^b <i>Non-residential yearly solid waste generation factors are from City of Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study, Table 4, July 2002. Residential rates are from L.A. CEQA Thresholds Guide.</i> ^c <i>Numbers have been rounded.</i> ^d <i>The vacant square footage refers to the 4,000 square feet of floor area within the existing commercial buildings on the Project Site that has been vacant since prior to 2018 but is assumed to be occupied in the future.</i> <i>Source: Eyestone Environmental, 2021.</i>					

o. Wildfire

As discussed above, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone,³¹ nor is it located within a City-designated fire buffer

³¹ *City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5546012002, 5546012004, 5546012005, 5546012006, and 5546012009, <http://zimas.lacity.org/>, accessed October 29, 2019. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.*

zone.³² In addition, the Project Site is not located on or near State responsibility areas or lands classified as very high fire hazard severity zones. Thus, no impacts related to the following would occur: (1) the impairment of an adopted emergency response plan or emergency evaluation plan related to wildfire; (2) the exposure of Project occupants to pollutant concentrations from a wildfire; (3) the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or (4) the exposure of people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes.

³² *City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.*