VI. Other CEQA Considerations

VI. Other CEQA Considerations

1. Significant Unavoidable Impacts

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

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

As evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, and summarized below, implementation of the Project would result in significant and unavoidable impacts with regard to on-site and off-site noise and vibration (pursuant to the significance criteria for human annoyance) during construction.

a. On-Site Construction Noise

As discussed in Section IV.I, Noise, of this Draft EIR, the estimated noise levels during all stages of Project construction would be below the significance threshold at receptor locations R2 and R4. However, the estimated construction-related noise would exceed the significance criterion at receptor locations R1, R3, and R5. The estimated construction-related noise would exceed the significance threshold by 22.9 dBA at receptor location R1, 2.6 dBA at receptor location R3, and 26.9 dBA at receptor location R5. Implementation of Mitigation Measure NOI-MM-1 (installation of temporary sound barriers) would reduce the Project's construction noise levels to the extent feasible. As noted in Section IV.I, Noise, of this Draft EIR, noise barriers can provide noise level reductions beginning from approximately 5 dBA, where the barrier just breaks the line-of-sight between the source and receiver, up to 15 dBA. Accordingly, implementation of Mitigation Measure NOI-MM-1 would reduce the noise generated by on-site construction activities at the off-site noise-sensitive uses by up to 15 dBA at receptor locations R1 and R5 and a minimum 5 dBA at receptor location R3. Implementation of Mitigation Measure NOI-MM-1 would, therefore, reduce the noise impacts at receptor location R3 to a less-than-significant level. However, due to the proximity of receptor locations R1 and R5 at approximately

60 feet and 70 feet, respectively, from the construction area, the estimated construction-related noise levels would still exceed the significance threshold at receptor locations R1 and R5 with the implementation of Mitigation Measure NOI-MM-1 as temporary noise barriers are typically limited to a 15-dBA noise reduction. There are no other feasible mitigation measures that could be implemented to further reduce the temporary noise impacts from on-site construction at receptor locations R1 and R5, as no permanent or larger barrier could be installed while still allowing construction access and flexibility during construction. Therefore, the Project's construction noise impact associated with on-site noise sources would be significant and unavoidable.

b. Off-Site Construction Noise

As discussed in Section IV.I, Noise, of this Draft EIR, the hourly noise levels generated by Project construction trucks would exceed the significance criterion of a 5-dBA increase over the ambient noise level along Beatrice Street, Westlawn Avenue, and Grosvenor Boulevard during the grading/excavation, foundation, and building construction phases. The estimated construction trucks noise levels along Jefferson Boulevard would be below the existing ambient noise level. There are no feasible mitigation measures that could be implemented to reduce this short-term impact because conventional mitigation measures, such as providing temporary noise barrier walls, would not be feasible as the barriers would obstruct vehicular and pedestrian access and visibility to the properties along the anticipated haul routes and would extend for a distance of approximately 1.2 miles on City streets until the haul trucks reach I-405. Therefore, the Project's construction noise impact associated with off-site construction traffic would be significant and unavoidable.

c. On-Site Construction Vibration (Human Annoyance)

As discussed in Section IV.I, Noise, of this Draft EIR, the estimated vibration levels from the on-site construction equipment would exceed the human annoyance significance criteria of 72 VdB at receptor location R1 and 65 VdB at receptor location R5. Mitigation measures considered to reduce vibration impacts from on-site construction activities with respect to human annoyance included the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be very deep and long to be effective and constructing a wave barrier to reduce the Project’s construction-related vibration impacts would, in and of itself, generate ground-borne vibration from the excavation equipment, thereby exacerbating, rather than mitigating, the overall Project vibration impact. As such, there are no feasible mitigation measures that could be implemented to reduce the temporary vibration impacts with respect to the human annoyance significance criteria from on-site construction to a less-than-significant level.

Therefore, Project-level vibration impacts pursuant to the human annoyance significance criteria from on-site construction activities would be significant and unavoidable.

d. Off-Site Construction Vibration (Human Annoyance)

As evaluated in Section IV.I, Noise, of this Draft EIR, the sensitive uses, including residential uses and recording studio uses are located within 25 feet from the anticipated truck haul routes and would be exposed to ground-borne vibration up to 72 VdB. This would exceed the 65-VdB significance criteria (for recording studio use) and would be at the 72-VdB significance criteria (for residential uses) from the construction trucks. In addition, it would not be feasible to install a wave barrier along the approximately 1.2 miles of public roadways for the off-site construction vibration impacts. Since there are no feasible mitigation measures that would reduce the potential vibration impacts with respect to human annoyance, Project-level vibration impacts with respect to human annoyance as a result of off-site construction truck travel would be significant and unavoidable.

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

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

As discussed in Section II, Project Description, of this Draft EIR, the underlying purpose of the Project is to redevelop the infill Project site with an integrated office campus that would generate new economic opportunities and support growing industries located within the Palms–Mar Vista–Del Rey community. The underlying purpose and objectives of the Project are closely tied to the goals and objectives of the Palms–Mar Vista–Del Rey Community Plan, which supports the objectives and policies of applicable larger-scale regional and local land use plans, including SCAG's 2020–2045 Regional Transportation Plan/Sustainability Communities Strategy (2020–2045 RTP/SCS) and the City's General Plan.

The Project's general consistency with the applicable goals set forth in the Palms–Mar Vista–Del Rey Community Plan is analyzed in Table 4 of Appendix H of this Draft EIR. As detailed therein, the Project would support the Palms–Mar Vista–Del Rey Community Plan's objective to provide opportunities for new commercial development and services within existing commercial areas through the development of a commercial project that

would strengthen the economic vitality of the area without the need for zoning amendments and without introducing incompatible uses. The proposed uses would also be located in an area well served by public transit, which would reduce vehicle miles traveled (VMT) and thereby help meet greenhouse gas (GHG) emission goals. The Project would also support the Palms–Mar Vista–Del Rey Community Plan's policy to require that commercial projects be designed and developed to achieve a high level of quality, distinctive character, and compatibility with surrounding uses and development. The Project site is located within a commercial office and industrial low- and medium-rise, mixed-use neighborhood. The Project would support this policy by developing a new architecturally designed modern 8-story building with retail and office space that has been designed to fit within the neighborhood context. Additionally, the Project would support the Palms–Mar Vista–Del Rey Community Plan's policy to encourage pedestrian-oriented design in designated areas and in new development as it would provide landscaping, seating areas, new sidewalks, and access points throughout the Project site, including an internal pedestrian paseo with landscaping and seating areas to activate the pedestrian use of the neighborhood and provide buffers and transitions. The Project would also support the Community Plan's goal to encourage alternative modes of transportation (Goal 11). Specifically, the Project would be located in an area well-served by public transit via multiple lines, including Metro Local Lines 108, 110, Commuter Express 437B, Culver CityBus Line 4, and City of Santa Monica Big Blue Bus 14. In addition, pursuant to Mitigation Measure TR-MM-1 in Section IV.K, Transportation, of this Draft EIR, the Project would implement a TDM Program to promote non-auto travel and reduce the use of single-occupant vehicle trips by including measures, such as price workplace parking, travel behavior change programming, bicycle parking (i.e., 63 spaces) with facilities, such as showers and repair station, and subsidization of transit fares. Furthermore, the Project would improve the pedestrian environment by providing a landscaped pedestrian paseo with seating and open space. As such, the Project would provide opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle trips.

The Project would be designed and constructed to incorporate energy conservation, water conservation, and waste reduction features to support and promote environmental sustainability, as set forth in Section II, Project Description, of this Draft EIR, including, but not limited to, Energy Star appliances, plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) that comply with the performance requirements specified in the City of Los Angeles Green Building Code, weather-based irrigation system, and water-efficient landscaping. The Project would comply with the Los Angeles Green Building Code, including Section 95.05.211, which requires that the Project provide at minimum 3,300 square feet of roof area reserved for a solar photovoltaic system. In addition, the Project would incorporate features of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program to be capable of meeting the standards of LEED Silver® or equivalent green building standards.

Furthermore, the Project would be required to reduce indoor water use by at least 20 percent, in accordance with the City of Los Angeles Green Building Code.

The Project would support the growth of the City's economic base by creating jobs in both Project construction and operation. The Project would create commercial opportunities that could serve local employees, generate local tax revenues, and provide new permanent jobs, which would also increase the Project area employment population to support local businesses. The Project is estimated to generate approximately 670 net new employees.

The Project's general consistency with the applicable goals set forth in the 2020–2045 RTP/SCS is analyzed in Table 1 of Appendix H of this Draft EIR. As discussed therein, the Project would be generally consistent with the applicable goals set forth in the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating environmental effects. Specifically, the Project would support the goals of the 2020–2045 RTP/SCS to improve mobility, accessibility, reliability, and travel safety, as well as protect the environment and health of the region's residents by improving air quality and encouraging active transportation (e.g., bicycling and walking). The Project would be developed in an infill location in an existing urbanized area with an established network of roads and freeways that provide local and regional access to the area, including the Project site. In addition, the Project site is served by a variety of nearby mass transit options, including a number of bus lines. The Project would also provide bicycle parking spaces and facilities, as well as EV charging stations, which would maximize mobility and accessibility by providing opportunities for several alternative modes of transportation. Therefore, the Project would improve the environment and health of nearby residents by supporting low and zero emission modes of transportation.

Based on the above, the Project reflects a development that is consistent with the overall vision of the City and SCAG to locate supporting and synergistic uses within one site to create sustainable communities and enhance quality of life throughout the City and the region. As such, the Project would be consistent with, and would contribute to, the implementation of local, regional, and State land use, mobility, and air quality objectives. Additionally, the Project's significant and unavoidable noise and vibration impacts would only occur during temporary and periodic construction activities, similar to those occurring at development sites in urban areas, particularly within infill locations. As such, the benefits of the Project, as outlined above, would outweigh the effects of the temporary significant and unavoidable impacts of the Project. Furthermore, as detailed in Section V, Alternatives, of this Draft EIR, no feasible alternative was identified that would avoid or substantially lessen one or more significant environmental impacts that would occur under the Project while still meeting most of the basic project objectives.

3. Significant Irreversible Environmental Changes

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

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

a. Building Materials and Solid Waste

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

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

non-renewable building materials, such as aggregate materials and plastics, would be reduced with compliance with the State and local solid waste policies.

b. Water

Consumption of water during construction and operation of the Project is addressed in the Initial Study prepared for the Project, which is included as Appendix A of this Draft EIR. As evaluated therein, given the temporary nature of construction activities, the short-term and intermittent water use during construction of the Project would be less than the net new water consumption estimated for the Project at buildout. During operation, the estimated water demand for the Project would not exceed the available supplies projected by the City of Los Angeles Department of Water and Power (LADWP), as confirmed by the Utility Report prepared for the Project and included as Appendix M 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. In addition, the Project would implement a variety of sustainable features related to water conservation to reduce indoor water use, as set forth in Section II, Project Description, of this Draft EIR, including, but not limited to, plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) that comply with the performance requirements specified in the City of Los Angeles Green Building Code, weather-based irrigation systems, and water-efficient landscaping. Furthermore, the Project would be required to reduce indoor water use by at least 20 percent in accordance with the City of Los Angeles Green Building Code. Thus, as evaluated in the Initial Study prepared for the Project, while Project construction and operation would result in some irreversible consumption of water, the Project would not result in the wasteful, inefficient, and unnecessary consumption of water.

c. Energy Consumption

During ongoing operation of the Project, non-renewable fossil fuels would represent the primary energy source, and, thus, the existing finite supplies of these resources would be incrementally reduced. Fossil fuels, such as diesel, gasoline, and oil, would also be consumed in the use of construction vehicles and equipment. Project consumption of non-renewable fossil fuels for energy use during construction and operation of the Project is addressed in Section IV.D, Energy, of this Draft EIR. As discussed therein, construction activities for the Project would not require the consumption of natural gas but would require the use of fossil fuels and electricity. On- and off-road vehicles would consume an estimated 29,626 gallons of gasoline and approximately 134,852 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.001 percent of the 2023 annual on-road gasoline-related energy consumption and 0.002 percent of the 2023 annual diesel

fuel-related energy consumption in Los Angeles County.[1] Trucks and equipment used during Project 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. Furthermore, as detailed in Section IV.D, Energy, of this Draft EIR, a total of approximately 27,782 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. Therefore, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources.

During operation, the Project's increase in electricity demand would be within the anticipated service capabilities of LADWP. Specifically, the Project's electricity demand would represent approximately 0.028 percent of LADWP's projected sales in 2025. As provided in Section IV.D, Energy, of this Draft EIR, the buildout of the Project is projected to generate a net decrease in the on-site demand for natural gas assuming compliance with Title 24 standards and applicable CALGreen and City of Los Angeles Code requirements (e.g., requires all new buildings be all-electric buildings with some exceptions). As the Project's natural gas consumption results in a decrease in the onsite demand for natural gas, the Project would be consistent with the forecasted 2025 consumption in SoCalGas' planning area. In addition, as discussed in Section IV.D, Energy, of this Draft EIR, the Project would be consistent with energy conservation policies and plans relevant to the Project, including the California Title 24 energy standards, the CALGreen Code, the City of Los Angeles Green Building Code, City of Los Angeles Green New Deal, and SCAG's 2020–2045 RTP/SCS. Such requirements of Title 24, CALGreen Code, and Green Building Code include, but are not limited to, specific lighting requirements to conserve energy, window glazing to reflect heat, enhanced insulation to reduce heating and ventilation energy usage, and enhanced air filtration. The Project would implement these measures as required by the applicable code. The Title 24 Standards ensure that builders use the most energy efficient and energy conserving technologies. The Project would comply with Los Angeles Green Building Code, including Section 95.05.211, which requires that the Project provide at minimum 3,300 square feet of roof area reserved for a solar photovoltaic system. In addition, the Project would incorporate features of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program to be capable of meeting the standards of LEED Silver® or equivalent green building standards. These include energy conservation, water conservation, and waste reduction features to support and promote environmental

[1] *Refer to Appendix E of this Draft EIR for detailed energy calculations.*

sustainability, including Project Design Feature GHG-PDF-1, as discussed above and included in Section IV.F, Greenhouse Gas Emissions, of this Draft EIR.

As included in Section IV.D, Energy, of this Draft EIR, gasoline and diesel fuel consumption during operation are estimated to be 242,933 gallons per year and 39,278 gallons per year, respectively, which would account for 0.007 percent of gasoline and 0.006 percent of diesel fuel consumption in Los Angeles County in 2025. As noted above, the Project includes a number of features that would reduce the number of VMT, such as increased density, a mixed-use development, and increased destination and transit accessibility.

Based on the above and as evaluated in detail in Section IV.D, Energy, and in Section M.2, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR, the Project would not cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F of the CEQA Guidelines. In addition, Project operations would not conflict with adopted energy conservation plans. Refer to Section IV.D, 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 Section IV.G, Hazards and Hazardous Materials, of this Draft EIR. The Project site is located within a City-designated Methane Zone as defined by the City Methane Ordinance. Excavation and construction activities within the Project site that involve work in confined spaces on-site could pose a potential for methane and hydrogen sulfide build-up, resulting in a possible hazardous condition. Adherence to industry-standard construction safety measures, as well as compliance with California Occupational Safety and Health Act safety requirements, would serve to reduce the risk in the event that elevated levels of these soil gases are encountered during grading and construction. The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used in office 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, pesticides for landscaping, and petroleum products. Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials used during construction and operation would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be reduced to a less-than-significant level through compliance with these standards and regulations. As such, compliance with regulations and standards would serve to protect against significant

and irreversible environmental change that could result from the accidental release of hazardous materials.

e. Conclusion

Based on the above, Project construction and operation would require the irreversible commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources and the Project site for future generations or for other uses. However, the consumption of such resources would not be substantial and would be consistent with regional and local growth forecasts and development goals for the area. The loss of such resources would not be highly accelerated when compared to existing conditions and such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result from the Project, such changes would be less than significant, and the limited use of nonrenewable resources that would be required by Project construction and operation is justified in light of the benefits of the Project outlined above in Section 2, Reasons Why the Project is Being Proposed, Notwithstanding Significant and Unavoidable Impacts.

4. Growth-Inducing Impacts

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

a. Population

As discussed in Section II, Project Description, of this Draft EIR, the Project would include the construction of new office and commercial uses. Since the Project does not propose a housing component, it would not directly induce a new residential population growth in the vicinity of the Project site or the Palms–Mar Vista–Del Rey Community Plan area.

b. Employment

The Project would have the potential to generate indirect population growth in the vicinity of the Project site as a result of the employment opportunities generated by the Project. During construction, the Project would create temporary construction-related jobs. However, the work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time in which their specific skills 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 the City of Los Angeles Department of Transportation (LADOT), the Project is estimated to generate approximately 670 net new employees on the Project site.[2] According to SCAG's 2020–2045 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2020 is approximately 1,887,969 employees.[3] 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.[4] Therefore, the projected employment growth in the City between 2020 and 2025 based on SCAG's 2020–2045 RTP/SCS is approximately 49,586 employees. The Project's net increase of 670 employees would represent 0.03 percent of the total number of employees in 2025 and 1.4 percent of the growth between 2020 and 2025. Therefore, the Project would not cause an exceedance of SCAG's employment projections contained in the 2020–2045 RTP/SCS and would not be considered "unplanned growth" such that the employment opportunities generated by the Project would induce unplanned residential growth.

Specifically, the proposed office and commercial uses would include a range of full-time and part-time positions that are typically filled by persons already residing in the

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[2] *LADOT and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.*

[3] *SCAG. ConnectSoCal (2020–2045 RTP/SCS), Demographics and Growth Forecast Appendix, Table 14, page 35. Based on a linear interpolation of SCAG's employment data for 2016 (1,848,300) and 2045 (2,135,900). The 2020 value is extrapolated from 2016 and 2045 values: [(2,135,900 – 1,848,300) ÷ 29) * 4] + 1,848,300 = ~ 1,887,969.*

[4] *SCAG. ConnectSoCal (2020–2045 RTP/SCS), Demographics and Growth Forecast Appendix, Table 14, page 35. Based on a linear interpolation of SCAG's employment data for 2016 (1,848,300) and 2045 (2,135,900). The 2025 value is extrapolated from 2016 and 2045 values: [(2,135,900 – 1,848,300) ÷ 29) * 9] + 1,848,300 = ~ 1,937,555.*

vicinity of the workplace, and who generally do not relocate their households due to such employment opportunities. Therefore, given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Although it is possible that some of the employment opportunities offered by the Project would be filled by persons moving into the surrounding area, which could increase demand for housing, it is anticipated that most of this demand would be filled by then-existing vacancies in the housing market and others by any new residential developments that may occur in the vicinity of the Project site. Additionally, employment opportunities provided by the Project may also be filled by employees who would commute to the Project site from adjacent neighborhoods and cities and would not create a new demand for additional housing in the Community Plan area. The Project site is highly accessible from a variety of public transit options—Metro bus lines 108 and 110, Commuter Express 437B, Culver City Bus Line 4, and City of Santa Monica Big Blue Bus 14—which would facilitate access from employees outside of the Community Plan area. Overall, 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 or who would commute to the Project site, the potential growth associated with Project employees who may relocate their place of residence to be near their place of employment would not be substantial as not all employees generated by the Project would move to the Community Plan area. As such, the Project's office and commercial uses would be unlikely to create an indirect demand for additional housing or households in the area.

c. Utility and Transportation Infrastructure Improvements

The area surrounding the Project site is already developed with a mix of residential, commercial, and industrial uses, and the Project would not remove impediments to growth. The Project site is located within an urban area that is currently served by existing utilities and infrastructure. While the Project would require local infrastructure upgrades to improve fire flow and connections to existing water, sewer, electricity, and natural gas lines on-site and in the immediate vicinity of the Project site, such improvements would be limited to serving Project-related demand and would not necessitate major local or regional utility infrastructure improvements that have not otherwise been accounted and planned for on a regional level. In addition, the Project would not require any major roadway improvements or 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, to improve safety and walkability, and/or provide Americans with Disabilities Act (ADA) access.

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, and reduce regional congestion. Therefore, direct and indirect growth-inducing impacts would be less than significant.

5. Potential Secondary Effects of Mitigation Measures

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

a. Noise

Mitigation Measure NOI-MM-1 requires temporary and impermeable sound barriers to be installed during construction along the southern property line of the Project site between the construction areas and receptor locations R1 and R3 and along the western property line of the Project site between the construction areas and receptor location R5. The installation of the sound barriers would include limited construction activities associated with installation. Any noise associated with this installation would not result in additional noise beyond what has already been disclosed in the discussion of construction impacts. In addition, temporary construction fencing would be placed along the periphery of the Project Site to screen construction activity from view at the street level. This would include screening of the temporary sound barrier. Furthermore, the sound barrier would reduce the Project's noise impacts from construction and upon completion of construction, the temporary sound barriers would be removed. As such, implementation of this mitigation measure would not result in adverse long term secondary impacts.

b. Transportation

Mitigation Measure TR-MM-1 requires the Project to prepare a TDM program. The following TDM elements would be included in the Project: price workplace parking (i.e., paid parking), voluntary travel behavior change program, bike parking per LAMC, secure bike parking with its own access points along with facilities pedestrian network

improvements, and transit subsidies. This mitigation measure would not involve any physical improvements that have not already been accounted for as part of the Project or that could require construction activities to occur. As such, this mitigation measure would not generate construction-related activities that could result in additional air emissions or generate construction-related noise. This mitigation measure would be beneficial in addressing potential VMT impact and fully mitigating the Project impact. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

6. Effects Not Found to Be Significant

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

a. Aesthetics

The Project site is not located along a State scenic highway. The nearest officially eligible (not designated) State scenic highway is along California State Route 1 (SR-1), specifically starting at Route 187 near Santa Monica, which is located approximately 2.3 miles northwest of the Project site and extends up to Route 101.[5] Thus, the Project would not substantially damage scenic resources within a designated scenic highway as there are no scenic highways along the Project site. Therefore, the Initial Study concluded no impact would occur.

[5] *Caltrans, Scenic Highways, List of eligible and officially designated State Scenic Highways.*

b. Agricultural and Forest Resources

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

c. Air Quality

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

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

In addition, the construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403 regarding visible emissions violations.[6] In particular, SCAQMD Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.[7] Therefore, with compliance with existing regulatory requirements, the Project would not create odors that would adversely affect a substantial number of people.

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[6] *SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed March 17, 2023.*

[7] *SCAQMD, Rule 402, Nuisance, adopted May 7, 1976.*

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

d. Biological Resources

The Project site is located in an urbanized area and is developed with office uses and surface parking. Limited ornamental landscaping exists on-site. The Project would not result in the removal, filling, or other means of hydrological interruption of Centinela Creek Channel, which is located approximately 330 feet north of the Project site. Construction activities would occur within the boundaries of the Project site and would be separated from the Centinela Creek Channel by an existing intervening property with a building and parking lot. Due to the developed nature of the Project area, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. The Project site does not support any habitat or natural community.[8] Thus, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). There are no riparian or other sensitive natural communities, or federally protected wetlands as defined by Section 404 of the Clean Water Act on the Project site or in the surrounding area. Furthermore, no water bodies that could serve as habitat for fish exist on the Project site or in the vicinity. In addition, there are no established native resident or migratory wildlife corridors on the Project site or in the vicinity. Accordingly, development of the Project would not impact any riparian habitat or other sensitive natural community, or on State or federally protected wetlands, or any regional wildlife corridors or native wildlife nursery sites. The Project would comply with the Migratory Bird Treaty Act. As the USFWS database of conservation plans and agreements does not show any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans applicable to the Project site, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans.

As discussed above, landscaping within the Project site is limited. There are 61 trees located within the Project site. Specifically, there are 51 Tipuana (*Tipuana tipu*) trees, 8 Ficus (*benjamina, retusa and macropylla*) trees, and two California sycamore (*Platanus racemose*) trees. All 61 trees on the Project site have a trunk diameter of eight inches or greater. The City's Protected Tree Ordinance identifies sycamore trees as a protected tree species. The Project would involve the removal of the 51 Tipuana trees and 8 Ficus trees.

[8] *United States Environmental Protection Agency, NEPAssist, https://nepassisttool.epa.gov/nepassist/nepamap.aspx, accessed March 17, 2023.*

The two California sycamore trees identified along the southern perimeter of the Project site would be retained as part of the Project. There are no street trees located within the public right-of-way adjacent to the Project site. In accordance with the Department of City Planning's policy, the on-site trees to be removed would be replaced on a 1:1 basis.

Based on the above, the Project would not affect any sensitive biological species or protected trees on-site. Therefore, the Initial Study concluded that impacts would not occur or would be less than significant.

e. Cultural Resources

Given the age (1970s through 1990s) and unremarkable design of the existing structures, which are not considered to reflect a particular historical or architectural style, the on-site structures are not considered historic resources. In addition, based on a review of the SurveyLA Historic Resources Survey Report for the Palms–Mar Vista–Del Rey community, the HistoricPlacesLA database,[9] and the Los Angeles ZIMAS database, the Project site, including the existing structures within the Project site, and any of the adjacent sites have not been individually listed in or formally determined to be eligible for listing in the National Register or the California Register. The Project site and the adjacent sites have also not been designated as a Historic-Cultural Monument and are not located within an existing Historic Preservation Overlay Zone. Therefore, there are no historic resources within and adjacent to the Project site.[10] Furthermore, a records search was conducted for the Project area by the South Central Coastal Information Center (SCCIC) at California State University, Fullerton to identify previously recorded prehistoric and historic resources in and around the Project site. The records search indicates that there are no historic resources located on-site or on adjacent sites. Therefore, as no historic resources are located within the Project site, removal of the existing buildings within the Project site and development of the Project would not create a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines. As such, the Initial Study concluded that impacts related to historical resources would be less than significant.

The Project site is located within an urbanized area and has been subject to previous grading and development and the potential for uncovering human remains on the Project site is low. Nevertheless, the Project would require grading, excavation, and other construction activities that could have the potential to disturb existing but undiscovered human remains. If human remains were discovered during construction of the Project,

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[9] *City of Los Angeles, HistoricPlacesLA, www.historicplacesla.org/map, accessed March 17, 2023.*

[10] *City of Los Angeles Department of City Planning, SurveyLA, Los Angeles Historic Resources Survey Report for the Palms–Mar Vista–Del Rey Community Plan Area, July 2012.*

work in the immediate vicinity of the construction area would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with Public Resources Code (PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determined the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the person or persons it believes to be most likely descended from the deceased Native American. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98.

Therefore, the Initial Study concluded that due to the low potential that any human remains are located on the Project site, and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, the Project's impact related to human remains would be less than significant.

f. Geology and Soils

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

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

The Project site is located in an area that has been identified by the State and the City as being potentially susceptible to liquefaction. The Geotechnical Investigation included as Appendix IS-3 of the Initial Study found that due to the depth of the historical highest groundwater level, the type of soils underlying the Project site, and the liquefaction mapping by the City and State, the Project site would be susceptible to liquefaction during an earthquake event. However, this would be mitigated by the building foundation system (piles), which will be drilled to penetrate through the liquefiable layers and deepened into the Older Alluvium below the site. Project design and construction would comply with all

applicable requirements of the LADBS for a site located within a potentially liquefiable area, as well as site-specific design recommendations set forth in the Geotechnical Engineering Investigation. As such, the Initial Study concluded that impacts associated with liquefaction would be less than significant.

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

Project construction activities, including grading, excavation, and other construction activities, have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. As discussed in the Initial Study, with compliance with regulatory requirements that include the implementation of Best Management Practices (BMPs), impacts related to soil erosion would be less than significant. Regarding soil erosion during Project operations, the Project would also be required to comply with the City's Low Impact Development (LID) ordinance and implement standard erosion controls to limit stormwater runoff. The Project site would be developed and landscaped, which would prevent soil erosion. Therefore, the Initial Study concluded impacts related to soil erosion or the loss of topsoil would be less than significant.

As provided in the Geotechnical Engineering Investigation, the on-site geologic materials are in the low to high expansion range. Project design and construction would comply with all applicable requirements of the LADBS for a site with underlying expansive soils, as well as site-specific design recommendations set forth in the Geotechnical Engineering Investigation. Therefore, with adherence to existing regulations and site-specific design recommendations provided in the Geotechnical Engineering Investigation, the proposed structure is feasible from a geotechnical engineering standpoint. Therefore, the Initial Study concluded that impacts related to unstable and expansive soils would be less than significant.

The Project's wastewater demand would be accommodated via connections to the existing wastewater infrastructure, and no septic tanks are proposed. Therefore, the Initial Study concluded no impact would occur.

g. Hazards and Hazardous Materials

The Project site is not located within an airport land use plan. The Project is located approximately 2 miles north of the Los Angeles International Airport. Based on a report published by the Los Angeles International Airport, the Project site is not located within the 2015 65 dB CNEL noise contours for the airport, indicating airport noise is not an issue at

the Project site.[11] As a result, the Project would not expose people working on the Project site to safety hazards or excessive noise. As such, the Initial Study concluded that there would be no impacts related to airport hazards.

As discussed in the Initial Study, the nearest emergency/disaster routes to the Project site are Lincoln Boulevard (1.0 mile) to the west, SR 90 (0.1 mile) and Venice Boulevard (1.5 miles) to the north, Sepulveda Boulevard (1.2 miles) to the east, and Manchester Avenue (1.6 miles) to the south.[12] 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-1 that would be implemented to ensure adequate circulation and emergency access. The Project would comply with Los Angeles Fire Department (LAFD) access requirements and applicable LAFD regulations regarding safety. Specifically, during the plan check process, the Project would be subject to the review of the LAFD for compliance with emergency access requirements along with other site specific design and safety regulations prior to the issuance of building permits. In addition, while the Project would generate traffic in the vicinity and result in some modifications to site access, the Project would comply with LAFD access requirements and would not impede emergency access within the vicinity. Thus, as discussed in the Initial Study, impacts related to implementation of an adopted emergency response plan would be less than significant.

There are no wildlands located in the vicinity of the Project site. The Project site is not located within a City-designated Very High Fire Hazard Severity Zone[13] or within a Wildfire Severity Zone.[14] 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 there would be no impacts related to wildland fires.

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[11] *Los Angeles International Airport, Title 14 Code of Federal Regulations (CFR) Part 150 Noise Exposure Map Report Update August 2015, Exhibit 5-1 2015 Noise Exposure Map.*

[12] *County of Los Angeles,* Disaster Routes, *https://geohub.lacity.org/datasets/6223f108d67d49958d05092e0b488740/explore?location=33.989774%2C-118.418705%2C15.00, accessed March 17, 2023.*

[13] *City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 4211006009 and 4211006026. 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" of the Los Angeles General Plan Safety Element.*

[14] *City of Los Angeles Emergency Management Department, City of Los Angeles 2018 Local Hazard Mitigation Plan, January 2018, Figure 13-8, p. 13-10.*

h. Hydrology and Water Quality

During Project construction, stormwater runoff could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. On-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges related to the storage, handling, use, and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. Therefore, Project-related construction activities could potentially result in adverse effects on water quality. However, in accordance with the requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) adhering to the California Stormwater Quality Association BMP Handbook.

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

During operation, the Project would introduce sources of potential stormwater pollution that are typical of commercial and office uses (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with vehicular parking and circulation areas). Consistent with the City's Low Impact Development (LID) Ordinance, the Project would implement best management practices (BMPs) on-site to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system and would result in improved surface water quality compared to existing conditions. As such, impacts to surface water quality during operation of the Project would be less than significant.

As provided in the Geotechnical Investigation included as Appendix IS-3 of the Initial Study, groundwater was encountered at depths between 22.5 and 30 feet below existing site grade. Anticipated excavation depths up to 22 feet would occur to provide for the new subterranean parking levels. Considering the depth to groundwater encountered and the depth of the excavation, temporary dewatering may be required during construction. Groundwater discharges from dewatering operations can contain high levels of fine sediments, which if not properly treated, exceed NPDES requirements. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all relevant NPDES and Los Angeles Regional Water Quality Control Board requirements related to construction and discharges from dewatering operations.

Thus, construction of the Project would result in less-than-significant impacts related to groundwater and would not substantially deplete groundwater supplies in a manner that would result in a net deficit in aquifer volume or lowering of the local groundwater table. Therefore, the Initial Study concluded construction impacts related to groundwater quality would be less than significant.

Operational activities, which could affect groundwater quality, include spills of hazardous materials and leaking USTs. The Project site does not contain any known USTs, and the Project would not introduce any USTs. The Project would comply with all applicable regulations that would prevent discharges that would adversely impact groundwater. Therefore, the Initial Study concluded impacts would be less than significant

With regard to groundwater recharge, the percolation of precipitation that falls on pervious surfaces is variable, depending on the soil type, condition of the soil, vegetative cover, and other factors. The Project site is approximately 90 to 99 percent impervious under existing conditions (or an average of 94.91 percent). With implementation of the Project, impervious surfaces would comprise approximately 93 and 96 percent (or an average of 94.55 percent) of the Project site. In addition, since the Project site is predominately impervious under existing conditions and would continue to be so upon completion of the Project, the amount of rainfall infiltration that would occur on the Project site would be nominal and would not contribute to groundwater recharge. Thus, the Project would not interfere substantially with groundwater recharge such that there would be a net deficit in the aquifer volume or lowering of the local groundwater table. Therefore, the Initial Study concluded impacts would be less than significant.

Construction activities associated with the Project, which would involve grading, 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, in accordance with NPDES requirements the Project would implement a SWPPP that would specify BMPs and erosion/siltation control measures to be used during construction to manage runoff flows so that runoff would not impact off-site drainage facilities and receiving waters. In addition, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce erosion or siltation on- or off-site. For operations, similar to existing conditions, there would be a limited potential for erosion or siltation to occur from exposed soils or large expanses of previous areas. Therefore, the Initial Study concluded impacts would be less than significant.

Construction activities have the potential to temporarily alter existing drainage patterns on the Project site by modifying flow direction and making the Project site temporarily more permeable. However, as discussed above, in accordance with NPDES requirements the Project would implement a SWPPP that would specify BMPs designed to

contain stormwater or construction watering on the Project site. Through compliance with all applicable NPDES requirements, including preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading regulations. As previously discussed, the Project site is comprised of approximately 90 to 99 percent impervious under existing conditions (or an average of 94.91 percent. With implementation of the Project, the amount of landscaped area would increase, resulting in a decrease in the amount of impervious surfaces on the Project site to approximately 93 and 96 percent (or an average of 94.55 percent). This increase in pervious surfaces would result in a reduction in stormwater runoff. Accordingly, there would be no increase in runoff volumes into the existing storm drain system. In addition, the implementation of BMPs required by the City's LID Ordinance would target runoff pollutants that could potentially be carried in stormwater runoff. Therefore, the Project would not substantially alter the existing drainage pattern of the Project site or surrounding area such that on-site or off-site flooding would occur, nor would it 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. As such, the Initial Study concluded impacts would be less than significant.

The Project site is not located within a 100-year flood plain as mapped by the Federal Emergency Management Agency (FEMA) or by the City. A review of the FEMA flood insurance rate maps (FEMA MAP NUMBER 06037C1760F, effective on 09/26/2008) indicates that the Project site is located within Zone X, area of minimal flood hazard. Thus, the Project would not impede or redirect flood flows. Therefore, the Initial Study concluded no impacts would occur.

In addition, the Project site is not mapped as being located within a flood control basin or within a potential inundation area.[15] The Project site is located approximately 2.6 miles east of the Pacific Ocean, and is not mapped as being located within an area potentially affected by a tsunami.[16] Therefore, no tsunami or tsunami events would be expected to impact the Project site. Additionally, there are no standing bodies of water on or near the Project site that could result in a seiche. Therefore, the Initial Study concluded no impacts would occur.

Furthermore, with compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation

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[15] *City of Los Angeles 2018 Local Hazard Mitigation Plan, January 2018, Figure 12-2, Mapped Tsunami Inundation Area in West Los Angeles APC, p. 12-5.*

[16] *City of Los Angeles 2018 Local Hazard Mitigation Plan, January 2018, Figure 12-2, Mapped Tsunami Inundation Area in West Los Angeles APC, p. 12-5.*

of a water quality control plan or a sustainable groundwater management plan. Therefore, the Initial Study concluded that impacts would be less than significant.

i. Land Use and Planning

The Project site is located within a commercial office and industrial low- and medium-rise, mixed-use neighborhood. The Project would replace the existing structures at 12575 W. Beatrice Street with a new office building. The existing office building at 12541 W. Beatrice Street would remain. All proposed development would occur within the boundaries of the Project site as it currently exists, and the Project does not propose a freeway or other large infrastructure that would divide a community. Therefore, the Initial Study concluded that impacts related to the physical division of an established community would be less than significant.

j. Mineral Resources

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

k. Noise (Operational)

The Project site is not located within the vicinity of a private airstrip or airport land use plan. However, the Project site is located approximately 2 miles north of the Los Angeles International Airport. Based on a report published by the Los Angeles International Airport, the Project site is not located within the 2015 65 dB CNEL noise contours for the airport, indicating airport noise is not an issue at the Project site.[17] Therefore, the Project would not expose people residing or working in the project area to excessive airport noise. As such, the Initial Study concluded impacts would be less than significant.

[17] *Los Angeles International Airport, Title 14 Code of Federal Regulations (CFR) Part 150 Noise Exposure Map Report Update August 2015, Exhibit 5-1 2015 Noise Exposure Map.*

I. Population and Housing

The Project would include the construction of new office and commercial uses. Since the Project does not propose a housing component, it would not directly induce a new residential population which would contribute to population growth in the vicinity of the Project site or the Palms–Mar Vista–Del Rey Community Plan area. 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.

Based on employee generation factors from the LADOT, the Project is estimated to generate approximately 670 net new employees on the Project site.[18] Overall, the provision of new jobs would constitute a small percentage of employment growth and would not be considered "unplanned growth" and would not produce such a high quantity of new jobs that it would have the possibility to induce unplanned residential growth. Therefore, the Project would not cause an exceedance of SCAG's employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities. As such, given that the Project would not directly contribute to substantial unplanned population growth in the Project area through the development of residential uses and as some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site or who would commute, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Further, as the Project would be located in a highly developed area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth.

Furthermore, as discussed previously, 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 such, the Initial Study concluded impacts would be less than significant.

The Project site is currently occupied by office uses and surface parking and no housing currently exists on the Project site. The Project would not displace any existing people or housing. Therefore, the Initial Study concluded no impact would occur.

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[18] *LADOT and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.*

m. Public Services

(1) Schools

The Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of students within the service area of LAUSD from the introduction of a residential population. In addition, the number of students that may be indirectly generated by the Project that could attend LAUSD schools serving the Project site would not be anticipated to be substantial because not all employees of the Project are likely to reside in the vicinity of the Project site. Furthermore, pursuant to Senate Bill 50, the Project Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Thus, the Project would not result in the need for new or altered school facilities. Therefore, the Initial Study concluded impacts would be less than significant.

(2) Parks and Recreation

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create a demand for parks. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks. In addition, Project employees would be more likely to use parks near their homes during non-work hours. Furthermore, the Project proposes on-site open space amenities, such as landscaped courtyards with seating for use by employees, reducing the likelihood employees would use local parks. Specifically, the Project proposes approximately 38,033 square feet of landscaped area (e.g., trees, green space, etc.) and 54,583 square feet of hardscape area (e.g., courtyards, pathways, etc.) throughout the Project site and on the building terraces on the upper levels of the proposed building. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks or the need for new or physically altered parks. As such, the Initial Study concluded impacts would be less than significant.

(3) Other Public Facilities

Since the Project does not propose the development of residential uses, the Project would not be expected to generate a substantial increase in the use of the Mar Vista Branch Library. In addition, as Project employees would be more likely to use library facilities near their homes during non-work hours and given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project site, Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library services. As such, any direct or indirect demand for library services generated by Project employees would be negligible. Therefore, the Initial Study concluded impacts on library facilities would be less than significant.

o. Utilities and Service Systems

(1) Wastewater

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Water Reclamation Plant (HWRP). The HWRP has a capacity of 450 million gallons per day (mgd),[19] and current average wastewater flows are at approximately 275 mgd.[20] Accordingly, the remaining available capacity at the HWRP is approximately 175 mgd. The Project would generate a net increase in wastewater flow from the Project site of approximately 29,182 gpd, or approximately 0.029 mgd. The Project's increase in average daily wastewater flow of 0.029 mgd would represent approximately 0.02 percent of the current estimated 175 mgd of remaining available capacity at the HWRP. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the HWRP. Furthermore, wastewater flows would be typical of office and commercial developments. No industrial discharge into the wastewater system would occur. Discharge of effluent from the HWRP into Santa Monica Bay is also regulated by permits issued under the NPDES and is required to meet Los Angeles Regional Water Quality Control Board (LARWQCB) requirements. As LA Sanitation & Environment (LASAN) monitors the treated wastewater, wastewater treated at the HWRP would not exceed wastewater treatment requirements of LARWQCB and new or expanded treatment facilities would not be required.

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[19] *LASAN, Water Reclamation Plants, Hyperion Water Reclamation Plant, Treatment Process, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=mibfkqjhf_5&_afrLoop=3077685258816373#!, accessed March 17, 2023.*

[20] *LASAN, Water Reclamation Plants, Hyperion Water Reclamation Plant, Treatment Process, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=mibfkqjhf_5&_afrLoop=3077685258816373#!, accessed March 17, 2023.*

Sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project site. Based on the Wastewater Service Information letter provided by LASAN, included in the Utility Technical Report provided in Appendix IS-5 of the Initial Study, the sewer infrastructure in the vicinity of the Project site includes an existing 8-inch line on Beatrice Street. The sewage from the existing 8-inch line feeds into a 12-inch line on Jandy Place then into a 30-inch line on McConnell Avenue before discharging into a 42-inch sewer line on Jefferson Boulevard. As determined by LASAN in their Wastewater Service Information letter, based the estimated flows of the Project, it is anticipated that the sewer system surrounding the Project site might be able to accommodate the total flow for the Project. In addition, ultimately, the Project's sewage flow would be conveyed to the HWRP, which has sufficient capacity for the Project. As required by LAMC Section 64.15, the Project would submit a Sewer Capacity Availability Request to LASAN to evaluate the capability of the existing wastewater system and obtain approval to discharge the Project's wastewater to the existing sewer system. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for the Project during the Project's permitting process. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Therefore, the Project would not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained.

Based on the above, the Project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Therefore, the Initial Study concluded impacts would be less than significant.

In regard to whether the Project would result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments, the wastewater generated under the Project would be accommodated by the future capacity of the HWRP. As such, the Initial Study concluded impacts would be less than significant.

(2) Stormwater

As discussed above in Section 6.h, Hydrology and Water Quality, the Project would not increase the percentage of impervious surface area on the Project site. Therefore, stormwater flows from the Project site would not increase with implementation of the Project. In addition, the Project would provide appropriate on-site drainage improvements

to control runoff. Thus, the Project would not require the construction of new stormwater drainage facilities or expansion of existing facilities. Impacts would be less than significant.

(3) Telecommunications Facilities

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

(4) Water Supplies

LADWP supplies water to the Project site. Consistent with LADWP's methodology, the analysis of the Project's impacts relative to water supply is based on a calculation of the Project's water demand by applying the sewage generation factors established by LASAN, which also serve to estimate water demand to the proposed uses. Assuming constant water use throughout the year, the Project would result in a net average daily demand of 34,336 gallons per day (gpd).

The 2015 Urban Water Management Plan[21] forecasts adequate water supplies to meet all projected water demands in the City for normal, single-dry, and multiple-dry years through the year 2040. As outlined in the 2015 Urban Water Management Plan, LADWP is committed to providing a reliable water supply for the City. The 2015 Urban Water Management Plan utilized SCAG's 2012–2035 RTP data that provide for reliable water demand forecasts, taking into account changes in population, housing units, and employment. As previously discussed, the Project would not generate a new residential or

[21] *Subsequent to the release of the Notice of Preparation for the Project in December 2020, LADWP released its 2020 Urban Water Management Plan in May 2021.*

household population on the Project site and would therefore not result in a direct population growth in the area. While some of the new employment positions could be filled by persons who would relocate to the vicinity of the Project site, this potential increase in population would not be substantial since not all employees would move close to the Project site. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project site and other persons would commute to the Project site from other communities in and outside of the City. Therefore, LADWP would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years, and the Initial Study concluded impacts would be less than significant.

(5) Solid Waste

The construction activities necessary to build the Project would generate debris, some of which may be recycled to the extent feasible. Pursuant to the requirements of Senate Bill (SB) 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. After accounting for mandatory recycling, the Project would result in approximately 683 tons of construction and demolition waste. Given the remaining permitted capacity the Azusa Land Reclamation facility, which is approximately 57.72 million tons, as well as the remaining 163.39 million tons of capacity at the Class III landfills serving the County, the landfills serving the Project site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.[22]

Upon full buildout, the Project would generate approximately 1,287 tons of solid waste per year when accounting for the removal of the existing land uses. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures, such as AB 939 which requires California cities, counties, and approved regional solid waste management agencies responsible for enacting plans and implementing programs to divert 50 percent of their solid waste away from landfills, compliance with AB 341, which requires California commercial enterprises and public entities that generate four or more cubic yards per week of waste to adopt recycling practices, and compliance with AB 1826, which requires businesses to recycle their organic waste. Likewise, the analysis does not include implementation of the City's Zero Waste LA franchising system, which is expected to result in a reduction of landfill

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

disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.[23] Solid waste that would be generated by the Project represents approximately 0.00079 percent of the remaining capacity for the Class III landfills serving the County.[24] 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.[25] 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, the Initial Study concluded impacts would be less than significant.

p. Wildfire

As discussed above, the Project site is not located within a City-designated Very High Fire Hazard Severity Zone[26] or within a Wildfire Severity Zone. In addition, the Project site is not located near State responsibility lands. Therefore, the Initial Study concluded no impacts related to the following would occur: (1) the impairment of an adopted emergency response plan or emergency evaluation plan related to wildfire; (2) the exposure of Project occupants to pollutant concentrations from a wildfire; (3) the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or (4) the exposure of people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes.

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

[24] *(1,287 tons per year/148.40 million tons) x 100 = 0.0009 percent*

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

[26] *City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 4211006009 and 4211006026. 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" of the Los Angeles General Plan Safety Element.*