

VI. Other CEQA Considerations

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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 associated with on- and off-site noise sources during construction and off-site vibration with respect to human annoyance during construction. Cumulative impacts regarding on- and off-site noise during construction and off-site vibration with respect to human annoyance during construction would also be significant and unavoidable.

a. On-Site Construction Noise

(1) Project-Level Impacts

As discussed in Section IV.F, Noise, of this Draft EIR, the estimated noise levels during all stages of Project construction would be below the significance criterion at off-site receptor locations R3, R4, and R5. However, the estimated construction-related noise from construction of the tower would exceed the significance threshold at receptor locations R1 and R2. Implementation of Mitigation Measure NOI-MM-1 (installation of temporary sound barriers during the tower construction) would reduce the noise generated by on-site construction activities at the off-site sensitive uses by a minimum of 11 dBA at the residential uses across the Project Site to the south (receptor location R1) and 12 dBA at the religious use across the Project Site to the east (receptor location R2). The estimated construction-related noise levels at the ground level of off-site sensitive receptor locations R1 and R2 would be reduced to below a level of significance with implementation of Mitigation Measure NOI-MM-1. However, the temporary sound barriers of Mitigation

Measure NOI-MM-1 would not be effective in reducing the construction-related noise levels from construction of the tower for the upper levels of the multi-story residential buildings located along the south side of 8th Street, represented by receptor location R1. In addition, the temporary sound barriers would not be effective in reducing the construction noise from construction of the tower at the upper levels of the proposed mixed-use development at 754 Hope Street that is represented by receptor location R2. In order to be effective at the upper levels of these multi-story residential buildings, the temporary noise barrier would need to be as high as the building, which would not be feasible (i.e., cost prohibitive and impractical). There are no other feasible mitigation measures to further reduce the construction noise from construction of the tower at the upper levels of receptor locations R1 and R2 to below the significance threshold. Therefore, construction noise impacts associated with on-site noise sources would be significant and unavoidable.

(2) Cumulative Impacts

As discussed in Section IV.F, Noise, of this Draft EIR, there would be potential cumulative noise impacts at the nearby sensitive uses (e.g., residential uses) located in proximity to the Project Site and Related Project No. 3, in the event of concurrent construction activities. Similar to the Project, noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures (e.g., providing temporary noise barriers) for each individual related project. However, as noted above, in order to be effective, the temporary noise barrier would need to be as high as the building, which would not be feasible (i.e., cost prohibitive and impractical). Beyond these temporary noise barriers, there are no other physical mitigation measures that may be feasible. As such, cumulative on-site noise impacts from on-site construction would be significant and unavoidable.

b. Off-Site Construction Noise

(1) Project-Level Impacts

As discussed in Section IV.F, Noise, of this Draft EIR, the Project includes off-site utility improvements, including installation of approximately 772 feet of 12-inch water main upgrade, and three hydrant installations along Hope Street between 7th Street and 8th Street. The Project also includes an off-site staging area along Hope Street, which would include a parking lane and a travel lane, adjacent to the Project Site, associated with construction of the tower. The estimated noise levels due to the off-site utility improvements associated with construction of the tower would exceed the significance criteria at the off-site receptor locations R1, R2, and R3. Noise levels associated with the off-site staging for construction of the tower would exceed the significance criteria at receptor location R2. The overlapping (composite) off-site construction noise levels for construction of the tower (off-site utility improvements and off-site staging) would exceed

the significance criteria at the off-site receptor locations R1, R2, and R3. Implementation of Mitigation Measure NOI-MM-1 (installation of temporary sound barriers) would provide minimum 3-dBA, 6-dBA, and 2-dBA noise reductions at receptor locations R1, R2 and R3, respectively. The estimated construction noise levels would be reduced to less than significant at receptor location R3. However, noise impacts would remain significant at receptor locations R1 and R2 (proposed mixed-use development at 754 Hope Street), as the temporary sound barrier would not be effective in reducing the construction noise at the upper levels at these two receptor locations, and there are no feasible mitigation measures to reduce construction noise at the upper levels. Therefore, construction noise impacts associated with the off-site utility improvements and off-site staging construction would remain significant and unavoidable. However, the significant noise impact at receptor location R1 would be limited to few days during the off-site utility improvements construction. Significant noise impacts at receptor location R2 would only occur if the proposed mixed-use development at 754 Hope Street is built and occupied during the tower construction.

(2) Cumulative Impacts

As discussed in Section IV.F, Noise, of this Draft EIR, the estimated off-site construction noise levels for the Project would be below the significance criteria along the anticipated truck routes, including 6th Street, Hope Street, and 8th Street. However, the Project would contribute to the number of cumulative truck trips that would generate noise level increases exceeding the 5-dBA significance criterion. Conventional mitigation measures, such as providing temporary noise barrier walls to reduce the off-site construction truck traffic noise impacts, would not be feasible as the barriers would obstruct the access and visibility to the properties along the anticipated truck routes. There are no other feasible mitigation measures to reduce the temporary significant noise impacts associated with the cumulative off-site construction trucks. As such, cumulative off-site noise impacts from off-site construction trucks would be significant and unavoidable.

c. Off-Site Construction Vibration (Human Annoyance)

(1) Project-Level Impacts

As discussed in Section IV.F, Noise, of this Draft EIR, per Federal Transit Administrator guidance, the significance criterion for human annoyance is 72 VdB for residential uses. The estimated vibration levels generated by construction trucks traveling along the anticipated haul route were assumed to be within 22 feet of the sensitive uses (i.e., residential uses) along 6th Street, Hope Street, and 8th Street. The temporary vibration levels could reach approximately 73.7 VdB periodically as trucks pass by sensitive receptors along the anticipated haul route(s) at a distance of 22 feet.

Mitigation measures considered to reduce vibration impacts from off-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, are cost prohibitive for temporary applications, such as construction, and are therefore considered infeasible. Additionally, constructing a wave barrier to reduce the Project's off-site construction-related vibration impacts would, in and of itself, generate ground-borne vibration from the excavation equipment. Furthermore, it would not be feasible to install a wave barrier along the public roadways for the off-site construction vibration impacts, as an open trench would block access to and from the sensitive receptor locations. Lastly, the applicant does not have a right to construct a wave barrier on properties they do not own, consequently the wave barrier would need to be installed on the public sidewalk, which the City would not permit due to disruption of streets and sidewalks. As such, there are no feasible mitigation measures to reduce the potential vibration human annoyance impacts. Therefore, the Project's vibration human annoyance impact from off-site construction activities would be significant and unavoidable.

(2) Cumulative Impacts

As discussed in Section IV.F, Noise, of this Draft EIR, Related Project No. 3 could use similar trucks as the Project; therefore, it is anticipated that construction trucks would generate similar vibration levels along 8th Street. There are residential uses along 8th Street, which could reach 73.7 VdB as the trucks pass by within 22 feet of the sensitive receptors. There are no feasible mitigation measures to reduce the potential vibration human annoyance impacts. Even though impacts would be temporary, intermittent, and limited to daytime hours when haul trucks are traveling within 25 feet of a sensitive receptor, cumulative vibration impacts from off-site construction with respect to human annoyance 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 associated 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 integrate needed high-density multi-family housing uses and associated amenities with existing commercial/retail/restaurant uses in close proximity to

an existing rail station portal and other public transit options and, thus, reduce vehicle miles traveled (VMT) and promote walkability within the Downtown community. As discussed in more detail below, the underlying purpose and associated objectives of the Project would support the objectives and policies of the Central City Community Plan, which supports the goal, objectives, and policies of applicable larger-scale regional and local land use plans, including the City's General Plan Framework Element (Framework Element) and the Southern California Association of Governments (SCAG) 2020–2045 Regional Transportation Plan/Sustainability Communities Strategy (2020–2045 RTP/SCS).

a. Central City Community Plan

The Project would increase the range of housing choices available to Downtown employees and residents, and foster development that can accommodate a full range of incomes, by providing residential units that range in unit types and sizes. The Project would encourage pedestrian activity by introducing a new residential entrance, as well as a new storefront for the relocated retail space and the relocated pedestrian passageway to the interior retail plaza, at the ground level along the Hope Street frontage of the existing podium building. The Project would feature high-quality finish materials on the ground-level façade and storefronts, which would create interest at the pedestrian scale, and would improve the pedestrian environment along Hope Street by providing enhanced sidewalk paving along a 190-foot portion of Hope Street as well as five new street trees. As such, the Project would provide opportunities to improve Downtown's pedestrian environment and circulation. In addition, the Project would reduce parking demand and per capita VMT within the Central Area Planning Commission area by placing residential uses next to a transit station and encouraging the use of alternative modes of transportation available in the immediate vicinity of the Project Site. The Project would promote the safety and security of personal property through proper design and effective use of the built environment by incorporating elements such as a dedicated security team for the residential tower; a closed-circuit security camera system; and proper lighting of building entries and walkways to provide for pedestrian orientation. Furthermore, the Project would intensify urban development in an area planned for such intensification and would take advantage of Downtown's easy access to mass transit facilities, the freeway system, and major boulevards that connect Downtown to the region. As such, the Project would support goals, objectives and policies of the Central City Community Plan.

b. Framework Element

The Project would contribute to the needs of the City's existing and future residents, businesses, and visitors by adding a new high-density residential development to an existing mixed-use development containing hotel and commercial uses, resulting in a synergistic development where people can live, work and play. The Project would also support the City's objective to provide for the stability and enhancement of multi-family residential

neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services, where the residents' quality of life can be maintained or improved. Specifically, because the Project Site does not contain any existing residential use and is located in an area characterized by a wide variety of commercial and multi-family residential uses, the Project would not displace existing housing or intrude into an existing established residential neighborhood. The Project would provide high-density multi-family residential uses integrated with an existing mixed-use hotel and commercial development, on a site already served by public infrastructure and services, including public transit (e.g., the Metro 7th Street/Metro Center Station within the Project Site and multiple existing adjacent bus routes). Residents of the Project and surrounding area would be provided streetscape improvements that would improve the pedestrian environment, including, but not limited to, an enhanced sidewalk paving along a portion of Hope Street, new replacement street trees, a new storefront for the relocated retail space, and the relocated pedestrian passageway to the interior retail plaza. The Project would also encourage a range of new housing opportunities within Downtown Los Angeles in close proximity to existing jobs and transit by locating the proposed mix of multi-family housing types in a high activity area well-served by public transit, particularly since the Project Site is within a TPA and SCAG-designated HQTAs. Overall, given the location of the Project Site along and in proximity to major transit corridors and transit stops, as well as the incorporation of pedestrian and streetscape improvements and design features, the Project would serve to reduce vehicular trips. As such, the Project would support goals, objectives and policies of the General Plan Framework Element.

c. 2020–2045 RTP/SCS

The Project would support the goals of the 2020–2045 RTP/SCS related to improving mobility and accessibility, maximizing the productivity of transportation systems, supporting healthy and equitable communities by improving air quality and promoting active transportation (e.g., bicycling and walking), and encouraging energy efficiency. Specifically, the Project would increase urban density on an already developed urban infill site in a City-designated TPA and SCAG-designated HQTAs in close proximity to jobs, shopping, services and transit (including an on-site Metro 7th Street/Metro Center Station portal), and would be served by an established network of roads and freeways. Furthermore, the Project would provide: (1) bicycle parking facilities in compliance with the Los Angeles Municipal Code (LAMC) requirements to promote the use of bicycles; (2) pedestrian enhancements including, but not limited to, replacement of street trees and enhanced sidewalk paving along a 190-foot portion of Hope Street, a new residential entrance, a new storefront for the relocated retail space, and the relocated pedestrian passageway to the interior retail plaza, which are all at the ground level along the Hope Street frontage of the existing podium building; (3) 30 percent of the new parking spaces

capable of supporting future electric vehicle supply equipment (EVSE) and 10 percent of the new parking spaces equipped with electric vehicle (EV) charging stations¹, (4) reserved area for future solar PV panel on roof plus conduit for wiring; (5) landscaped roof terraces; and (6) energy saving technologies and appliances pursuant to Project Design Feature GHG-PDF-1. Furthermore, the Project would be required to comply with the City's All-Electric ordinance which does not allow installation of natural gas-powered equipment (stoves, water heaters, space heating) within residential uses. As such, the Project would be designed and constructed to incorporate features to support and promote environmental sustainability. As such, the Project would support the goals and strategies of the 2020–2045 RTP/SCS.

Based on the above, the Project reflects a development that is consistent with the overall vision of the Central City Community Plan as well as with other primary land use plans such as the Framework Element and SCAG's 2020–2045 RTP/SCS. As such, the benefits of the Project as outlined above and described more fully in Section II, Project Description, of this Draft EIR, would outweigh the effects of the significant and unavoidable impacts of the Project, all of which are temporary construction impacts associated with construction of the new building.

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,

¹ *The parking spaces capable of supporting future EVSE and the parking spaces equipped with EV charging stations would apply to the new parking spaces on the new parking levels.*

natural gas, and transportation. As demonstrated below, the Project would not consume a large commitment of natural resources or result in significant irreversible environmental changes.

a. Building Materials and Solid Waste

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

The Project's potential impacts related to solid waste are addressed in the Initial Study prepared for the Project, which is included as Appendix A to this Draft EIR. As discussed therein, pursuant to the requirements of Senate Bill (SB) 1374,² the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of its 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. In addition, during operation, the Project would provide adequate storage areas in accordance with the City's Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.³ The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Overall, the Project would adhere to State and local solid waste policies and objectives that further goals to divert waste. Thus, the consumption of non-renewable building materials, such as aggregate materials and plastics, would be reduced and the Project would not result in significant impacts regarding solid waste.

b. Water

Consumption of water during construction and operation of the Project is addressed in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. As discussed therein, water use during construction would be partially offset by

² *Senate Bill 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills.*

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

the estimated 597 gallons per day (gpd) of water currently consumed by the existing on-site uses to be removed. Additionally, based on the temporary nature of construction activities, Project construction water demand would be anticipated to be less than the operational water demand. During operation, the estimated water demand of 55,530 gpd for the Project would not exceed the available supplies projected by the City of Los Angeles Department of Water and Power (LADWP). 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 water use, as set forth in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, including but not limited to Energy Star appliances; drip/surface irrigation; proper hydro-zoning/zoned irrigation, and drought-tolerant plants. Thus, as evaluated in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, while Project construction and operation would result in some irreversible consumption of water, the Project would not result in a significant impact related to water supply.

c. Energy Consumption

During ongoing operation of the Project, non-renewable fossil fuels would represent the primary energy source, and thus the existing finite supplies of these resources would be incrementally reduced. Fossil fuels, such as diesel, gasoline, and oil, would also be consumed in the use of construction vehicles and equipment. Project consumption of non-renewable fossil fuels for energy use during construction and operation of the Project is addressed in Section IV.C, Energy, of this Draft EIR. As discussed therein, construction activities for the Project would not require the consumption of natural gas but would require the use of fossil fuels and electricity. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. In addition, long-term construction lighting (longer than 120 days) providing illumination for the construction site and staging areas would also comply with applicable Title 24 requirements, which include limits on the wattage allowed per specific area, which would result in the conservation of energy. As detailed in Section IV.C, Energy, of this Draft EIR, trucks and equipment used during construction activities would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Further, on-road vehicles (i.e., haul trucks, worker vehicles) would be subject to federal fuel efficiency requirements. Therefore, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Thus, impacts related to the consumption of fossil fuels during construction of the Project would be less than significant.

During operation, the Project's increase in electricity demand would be within the anticipated service capabilities of LADWP, respectively. As detailed in Section IV.C,

Energy, of this Draft EIR, the Project would be subject to the City's all-electric ordinance which does not allow for natural gas equipment to be installed as part of the Project. Removal of existing uses which consume natural gas would result in a net decrease in natural gas emissions. As discussed in Section IV.C, Energy, of this Draft EIR, the Project would comply with Title 24 standards and applicable CALGreen requirements. The Applicant would also implement Project Design Feature GHG-PDF-1 in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, which states that the design of the new building would incorporate sustainability features (e.g., Energy Star-labeled products, and use of LED lighting), and Project Design Feature WAT-PDF-2, presented in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, which states that the Project would incorporate water conservation features, such as high-efficiency Energy Star-rated residential clothes washers and dishwashers, drought-tolerant plans, and drip/subsurface irrigation, among others.

With regard to transportation energy, as noted above, the Project is located in an HQT and TPA and includes a number of features that would reduce the VMT such as increased density, a mixed-use development, bicycle parking per code, pedestrian improvements, and increased destination and transit accessibility (including the existing Metro station portal within the Project Site). With incorporation of these measures and associated vehicle trips, net transportation-fuel usage would be reduced for both gasoline and diesel fuels.

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 prepared for the Project, included as Appendix A of this Draft EIR. As evaluated therein, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used in residential developments, including cleaning products, paints, and those used for maintenance of landscaping. Construction of the Project would also involve the temporary use of potentially hazardous materials, fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners. However, all potentially hazardous materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local 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.

The Project Site is located within a designated Methane Buffer Zone as mapped by the City.⁴ 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. In addition, as the Project is located in a Methane Buffer Zone, the Project would be required to comply with the City's methane ordinance (Ordinance No. 175790), which requires site testing for methane concentrations and soil gas pressures, and based on the results of such testing, may require a methane system to be integrated into the Project's design during construction. As such, with compliance with existing regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving methane gas.

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 for future generations or for other uses. However, as noted in Section IV.C, Energy and Section J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, and in the Initial Study prepared for the Project, which is included as Appendix A of this Draft EIR, the consumption of such resources would not be considered substantial and would be consistent with regional and local growth forecasts and development goals for the area. The loss of such resources would not be highly accelerated when compared to existing conditions and such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result from the Project, such changes would be less than significant, and the limited use of nonrenewable resources that would be required by Project construction and operation is justified.

4. Growth-Inducing Impacts

CEQA Guidelines Section 15126.2(e) requires that growth-inducing impacts of a project be considered in a Draft EIR. Growth-inducing impacts are characteristics of a

⁴ CalGEM, Well Finder Online Mapping System, <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.25455/34.04665/15>, accessed November 13, 2023.

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 develop 466 new residential units. Based on generation factors from the LADOT's Vehicle Miles Traveled Calculator, the Project's new residential units would generate approximately 1,049 residents.⁵ According to SCAG's 2020–2045 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2022 is approximately 4,107,076 persons.⁶ As projected by the 2020–2045 RTP/SCS, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,366,990 persons in 2031, the projected occupancy year of the Project.⁷ Therefore, the projected population growth between 2022 and 2031 is approximately 259,914 persons. The estimated 1,049 new residents generated by the Project would represent approximately 0.40 percent of the population growth forecasted by SCAG's 2020–2045 RTP/SCS in the City of Los Angeles Subregion between 2022 and 2031. Therefore, the Project's residents would be well within SCAG's population projections in the 2020–2045 RTP/SCS for the Subregion and would not result in a significant direct growth-inducing impact.

⁵ *City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020.*

⁶ *Based on a linear interpolation of SCAG's 2016–2045 data, the 2022 values for population are calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to each year until 2022.*

⁷ *Based on a linear interpolation of SCAG's 2016–2045 data, the 2031 values for population are calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to each year until 2031.*

b. Employment

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 in Southern California, the Project would not be considered growth-inducing from a short-term employment perspective. Rather, the Project would have the beneficial effect of providing new employment opportunities during the construction period.

With regard to operation, the Project would not include uses that would generate new employment positions (e.g., new office or retail uses). As such, the Project would not indirectly contribute to employment growth in the vicinity of the Project Site. 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.

c. Utility Infrastructure Improvements

The area surrounding the Project Site is already developed with a mix of mid- to high-rise buildings containing a variety of uses, including commercial (office, retail and restaurant), multi-family residential, institutional, and parking uses. The Project would not be a project that would remove obstacles to population growth as discussed in CEQA Guidelines Section 15126.2(e) (e.g., a major expansion of a wastewater treatment plant). The Project Site is located within an urban area that is currently served by existing utilities and infrastructure. While the Project would require local infrastructure upgrades to maintain and improve water, sewer, electricity on-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 SCAG growth forecast for the City of Los Angeles Subregion. Further, given the Project's location on an urban infill site that is adequately served by public infrastructure in close proximity of public transit, the Project would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, and reduce regional congestion through the reduction of vehicle miles traveled. 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 erected during construction along the southern property line of the Project Site between the construction areas for the new tower and the noise sensitive use on the south side of 8th Street (receptor R1), the eastern side of the Project Site’s off-site staging area (along Hope Street) between the construction areas for the new tower and the noise sensitive use on the east side of Hope Street (receptor R2), and during off-site utility improvements construction along Hope Street. The noise and vibration from installation of the temporary sound barrier would be short-term and would occur within the specified construction hours and days permitted by the City’s noise regulations. 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 Mitigation Measure NOI-MM-1 would not result in additional significant 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 determined through the Initial Study that the Project would not have the potential to cause significant impacts related to aesthetics; agricultural and forest resources; objectionable odors; biological resources; cultural resources (archaeological resources and human remains); geology and soils; hazards and hazardous materials; hydrology and water quality; physical division of an established community; mineral resources; airport and airstrip-related noise;

population and housing; public services (schools, parks, and other public facilities); recreation; hazards due to geometric design features; utilities and service systems (wastewater, stormwater drainage facilities, telecommunications, and solid waste); and wildfire. A summary of the analysis provided in Appendix A for these issue areas is provided below.

a. Aesthetics

As detailed in the Initial Study, Senate Bill (SB) 743 [Public Resources Code (PRC) Section 21099(d)] sets forth the following: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” PRC Section 21099 applies to the Project since the Project is a residential project located within 0.5 mile of a major transit stop. As such, the aesthetic impacts of the Project shall not be considered significant impacts on the environment. Nonetheless, an analysis of the Project’s potential aesthetics impacts is included in the Initial Study for informational purposes only and not for determining whether the Project will result in significant impacts on the environment. The analysis therein concludes that even in the absence of SB 743, aesthetic impacts of the Project would be less than significant.

b. Agricultural and Forest Resources

The Project Site is located in an urbanized area of the City and is developed with hotel and commercial uses and associated parking as well as a portal that provides access to the Metro 7th Street/Metro Center Station. 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 vicinity of the Project Site. Therefore, as determined in the Initial Study, no impacts to agricultural or forest resources would occur.

c. Air Quality (Objectionable Odors)

No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses. In addition, on-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

Construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.⁸ Therefore, as determined in the Initial Study, impacts related to objectionable odors would be less than significant.

d. Biological Resources

The Project Site is located in an urbanized area and is currently developed with hotel and commercial uses and associated parking as well as a portal that provides access to the Metro 7th Street/Metro Center Station. As detailed in the Initial Study, there are 25 right-of-way trees, and no private property trees associated with the Project Site. Due to the urbanized and developed nature of the Project Site and surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Thus, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). No riparian or other sensitive natural communities, or state and federally protected wetlands exist on the Project Site or in the surrounding area.^{9,10} In addition, there are no established native resident or migratory wildlife corridors on the Project Site or in the vicinity. Accordingly, development of the Project would not impact any regional wildlife corridors or native wildlife nursery sites. As determined in the Initial Study, no Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.¹¹ Therefore, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans.

None of the 25 right-of-way trees are considered to be protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.^{12,13} As indicated in the Tree

⁸ SCAQMD, *Visible Emissions, Public Nuisance, and Fugitive Dust*, www.aqmd.gov/home/rules-compliance/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed November 13, 2023.

⁹ City of Los Angeles Department of City Planning, *ZIMAS, Parcel Profile Report for APNs 5144-010-401, -405, -408, -421, -422, -423, and -425*.

¹⁰ USFWS, *National Wetlands Inventory*, www.fws.gov/wetlands/data/Mapper.html, accessed November 13, 2023.

¹¹ CDFW, *California Natural Community Conservation Plans, April 2019*.

¹² Carlberg Associates, *City of Los Angeles Tree Inventory Report—The Bloc, 700 S. Flower Street, 700 W. 7th Street, and 711 S. Hope Street, Los Angeles, California 90017, May 26, 2022*. See Appendix IS-2 of the Initial Study.

¹³ Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure four inches or (Footnote continued on next page)

Inventory Report, five of the 25 right-of-way trees on Hope Street would be removed as part of the Project and replaced in compliance with applicable City requirements. All other street trees would be avoided or preserved in place. As detailed in the Initial Study, the Project would comply with the Migratory Bird Treaty Act (MBTA) and other applicable law by conducting tree removal activities outside of the nesting season (February 1–August 31) to the extent feasible, and if any tree or vegetation removal activities occur during the nesting season, the Applicant would retain a biological monitor 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 is based on the professional judgement of the monitoring biologist, in coordination with the CDFW, as appropriate. The Project Site is located in an urbanized area that is currently fully developed and 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.

For all the foregoing reasons, Project impacts to biological resources would be less than significant.

e. Cultural Resources (Archaeological Resources and Human Remains)

With regard to archaeological resources, the Project Site is located within an urbanized area of the City and has been subject to grading, excavation and fill activities, and development in the past. There are no known archaeological resources within the Project Site, and no documentation has been found depicting zanja segments within the Project Site. The Project would require limited excavation associated with building foundations within the existing below-grade parking levels. Thus, the Project could have the potential to disturb any previously undiscovered archaeological resources. Nevertheless, the City has established a standard condition of approval to address inadvertent discovery of archaeological resources. Should archeological resources be inadvertently encountered, this condition of approval provides for temporary halting of construction activities near the encounter so the find can be evaluated. An archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the

more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.

evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements as set forth in CEQA Section 21083.2. As determined in the Initial Study, with adherence to the City's standard condition of approval consistent with CEQA Section 21083.2, the Project would not cause a substantial adverse change in the significance of an archaeological resource. As such, impacts to archaeological resources would be less than significant.

With regard to human remains, the Project site is located within an urbanized area and has been subject to previous grading and development. Therefore, the potential for uncovering human remains on the Project site is low. Nevertheless, the Project would require limited excavation associated with building foundations within the existing below-grade parking levels. As such, construction activities could have the potential to disturb existing but undiscovered human remains. If human remains were discovered during construction of the Project, work in the immediate vicinity of the construction area would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains, and any associated grave goods would occur in accordance with Public Resources Code 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, as concluded in the Initial Study, 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

(1) Faults and Groundshaking

The Project Site is not located within a an Alquist-Priolo Earthquake Fault Zone as mapped by the California Geological Survey (CGS) or within a City-designated Preliminary Fault Rupture Study Area.¹⁴ In addition, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. According to the Geotechnical Evaluation, included as Appendix IS-4 of the Initial Study, the Project Site is underlain at depth by the Compton and Puente Hills blind thrust faults; however, these faults do not present a potential surface fault rupture hazard. Therefore, as concluded in the Initial Study, since the potential for surface rupture due to faults 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 California Building Code and Los Angeles Building Code regulations and the recommendations of the design level geotechnical investigation for the Project. The Project would also require seismic retrofit of the existing non-ductile concrete podium (pursuant to City Ordinance No. 183,893). As part of the seismic retrofit, the diameter of the existing columns must be enlarged by approximately 1 foot. New shear walls would be located on all levels of the existing podium building and the two new parking levels, along the interior walls facing west, south and east. The thickness of the shear walls would range from approximately 2 feet to 3 feet to strengthen the structural support system on each level of the podium. In addition, in order to construct the residential tower, a portion of the existing parking levels and the retail levels of the podium building must be removed to add new structural columns, elevators, stairwells, bicycle parking, mechanical rooms, storage areas, etc. In addition, the Project would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions such as strong seismic ground shaking. As such, the Initial Study concluded that impacts related to strong seismic ground shaking would be less than significant.

(2) Liquefaction

The Project Site is not located in an area that has been identified by the State or the City as being potentially susceptible to liquefaction.¹⁵ Also, according to the Geotechnical

¹⁴ The City's ZIMAS System (<http://zimas.lacity.org/>) confirms the location of the Project Site within a TPA. See Zoning Information File No. 2452 and Parcel Profile Reports for APNs 5144-010-401, -405, -408, -421, -422, -423, and -425.

¹⁵ The City's ZIMAS System (<http://zimas.lacity.org/>) confirms the location of the Project Site within a TPA. See Zoning Information File No. 2452 and Parcel Profile Reports for APNs 5144-010-401, -405, -408, -421, -422, -423, and -425.

Evaluation, the soils encountered in the borings drilled at the Project Site were stiff and/or dense and are not susceptible to liquefaction or seismically induced settlement. Furthermore, as concluded in the Geotechnical Evaluation, groundwater was not present in the upper 50 feet beneath the Project Site; therefore, the potential for liquefaction and seismically induced settlement is considered low. As such, the Initial Study concluded that impacts associated with liquefaction would be less than significant.

(3) Lateral Spreading

The Project Site is within a heavily urbanized area with gentle south and southeast surface gradient. The Project Site is not located in a landslide area as mapped by the State or the City.¹⁶ Further, development of the Project also would not include altering the existing topography of the Project Site such that steep slopes would be introduced. As such, the Initial Study concluded that impacts from landslides and lateral spreading would be less than significant.

(4) Erosion

Project construction activities, including grading, limited 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. However, this potential soil erosion would be reduced by the implementation of standard erosion controls during site preparation and grading activities. Specifically, all grading activities would require grading permits from the Los Angeles Department of Building and Safety (LADBS), which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavation, and fills. The Project would also be required to comply with the City's Low Impact Development (LID) ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Regarding soil erosion during Project operations, the potential is negligible since the Project Site would mostly remain fully developed and no soils would be left exposed. Therefore, as determined in the Initial Study, with compliance with applicable regulatory requirements, impacts related to substantial soil erosion or the loss of topsoil would be less than significant.

¹⁶ The City's ZIMAS System (<http://zimas.lacity.org/>) confirms the location of the Project Site within a TPA. See Zoning Information File No. 2452 and Parcel Profile Reports for APNs 5144-010-401, -405, -408, -421, -422, -423, and -425.

(5) Unstable Geologic Units

Regarding unstable geologic units, as indicated above, the Project would not be subject to or exacerbate liquefaction (including lateral spreading) or landslides. As discussed in the Geotechnical Evaluation, the alluvial soils encountered in the borings drilled at the site were stiff and/or dense and not susceptible to collapse. In addition, because there is no large-scale extraction of groundwater, gas, oil or geothermal energy at the Project Site or in the general vicinity of the Project Site, there is no potential for ground subsidence due to withdrawal of fluid or gas at the Project Site. Lastly, the specific details of the building foundations would comply with City requirements regarding structural loads and would be determined as part of the review and approval of a design level site-specific geotechnical investigation by LADBS. Therefore, as concluded in the Initial Study, the Project would not cause geologic unit or soil to become unstable. Impacts would be less than significant.

(6) Corrosive Soils

As provided in the Geotechnical Evaluation, the soils underlying the Project Site are predominately sands with lesser silts and clays and, hence, are primarily of low expansion potential. However, the fine-grained alluvial soils may be moderately expansive. The Project design and construction would comply with all applicable requirements of the LADBS for a site with underlying expansive soils. Thus, as concluded in the Initial Study, compliance with regulatory requirements would ensure that potential impacts associated with expansive soils would be less than significant. Additionally, as discussed in the Initial Study, localized areas of corrosive soils may be present at the Project Site which could react adversely to buried steel and concrete. In accordance with regulatory requirements, site-specific design requirements for corrosive soils could include isolation of utilities from soils with barriers or wrappings, cathodic isolation, and/or cathodic protection. Therefore, compliance with regulatory requirements would ensure that potential impacts associated with corrosive soils would be less than significant.

(7) Soils Supporting Septic Tanks

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.

(8) Paleontological Resources

With regard to paleontological resources, the Project would require limited excavation associated with building foundations within the existing below-grade parking

levels. Thus, it is possible that paleontological artifacts that were not recovered during prior construction or other human activity may be present. However, the City has established a standard condition of approval to address inadvertent discovery of paleontological resources. Should paleontological resources be inadvertently encountered, this condition of approval provides for temporary halting construction activities near the encounter so the find can be evaluated. A paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum and the Department of City Planning. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist. Therefore, as concluded in the Initial Study, with implementation of the City's established condition of approval to address any inadvertent discovery of paleontological resources, impacts would be less than significant.

g. Hazards and Hazardous Materials

(1) Use of Hazardous Materials

During demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be routinely used on the Project Site. Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in residential uses, including cleaning products, paints, and those used for maintenance of landscaping. However, all potentially hazardous materials would be used, stored, and disposed of in accordance with all applicable federal, state and local requirements. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations.

(2) Existing Hazards

The Phase I Environmental Site Assessment (Phase I ESA), included as Appendix IS-5 of the Initial Study, included a review of environmental records for the Project Site and a site reconnaissance to identify potential on-site hazards. As discussed therein, no Historical Recognized Environmental Conditions (HRECs), Recognized Environmental Conditions (RECs), or Controlled Recognized Environmental Conditions (CRECs) were identified in connection with the Project Site. A Tier I (non-intrusive) Vapor Encroachment Screening (VES) was conducted on the Project Site in accordance with the methodology set forth in ASTM E 2600-15, Standard Guide for Vapor Encroachment Screening on

Property Involved in Real Estate Transactions. As concluded in the Phase I ESA, historical and current uses on the Project Site were not identified to likely represent a vapor encroachment condition (VEC). Additionally, none of these impacted properties identified as part of the Phase I ESA are suspected of having petroleum or chemical contaminant plumes that would be identified as a VEC.

(3) Underground and Aboveground Storage Tanks

According to the Phase I ESA, no evidence of existing Underground Storage Tanks (USTs) was observed on the Project Site. No other records were found that indicate the presence of USTs within the areas proposed for construction. Six 25- and 50-gallon Aboveground Storage Tanks (ASTs), a 1,000-gallon AST, and two 8,800-gallon ASTs containing diesel fuel were observed on-site; however, the ASTs appear to be in good condition and void of leaks, and no suspect conditions were noted. In the unlikely event that USTs are found, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. With regard to operation, the Project does not propose the installation of underground or aboveground storage tanks. Therefore, with compliance with applicable regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts related to USTs and ASTs would be less than significant.

(4) Asbestos

Based on an asbestos survey previously conducted for the Project Site (see Appendix IS-5 of the Initial Study), positive asbestos results were detected in samples of drywall and tape, joint compound, fireproofing material, wall and ceiling texture, transite panels, thermal systems insulation, floor tile and mastic, carpet mastic and glue, cove base mastic, exterior stucco, leveling compound, and pipe wrap. However, the Project Site has since then undergone asbestos abatement and an Asbestos Operations and Maintenance Plan was prepared for the Project Site. Since remaining materials were observed in good condition, no further action is recommended at this time other than maintaining same in good condition under the existing Asbestos Operations and Maintenance Program. With compliance with relevant regulations and requirements regarding asbestos-containing materials, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment. With regard operation, development of the Project would include the use of commercially-sold construction materials that would not include asbestos or asbestos containing materials (ACMs). Project operation is, therefore, not anticipated to increase the occurrence of friable asbestos or ACMs at the Project Site. Therefore, with compliance with applicable regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the

release of hazardous materials into the environment. Impacts related to ACMs would be less than significant.

(5) Lead-Based Paint

Based on a lead paint survey previously conducted for the Project Site (see Appendix IS-5 of the Initial Study), positive lead paint results were reported in several locations throughout the Project Site. Due to the extensive renovation activities that have occurred on-site, it is likely that some lead paint has been removed, although no documentation regarding any specific lead paint abatement was provided. Nonetheless, in the event that lead-based paint (LBP) is found within areas proposed for demolition, suspect materials would be removed in accordance with procedural requirements and regulations for the proper removal and disposal of LBP prior to demolition activities, including standard handling and disposal practices pursuant to OSHA regulations. Therefore, with compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of LBP into the environment. With regard to operation, development of the Project would include the use of commercially-sold construction materials that would not include LBP. Project operation is, therefore, not anticipated to increase the occurrence of LBP at the Project Site. Therefore, with compliance with applicable regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts related to LBP would be less than significant.

(6) PCBs

According to the Phase I ESA for the Project Site, four electrical transformers, three hydraulic solid waste compactors, and a high-voltage switch were observed on-site. According to the Phase I ESA, based on the age of the compactors, the hydraulic components are not suspected to contain polychlorinated biphenyls (PCBs). However, it is likely that the transformers and high-voltage switch contain PCBs. Therefore, in the event that PCBs are found within areas proposed for demolition, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. With regard to operation, the new electrical systems to be installed as part of the Project would not contain PCBs. Therefore, during operation of the Project, maintenance of such electrical systems would not expose people to PCBs and operation of the Project would not expose people to any risk resulting from the release of PCBs in the environment. Therefore, with compliance with applicable regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts related to PCBs would be less than significant.

(7) Methane

As discussed in the Initial Study, the Project Site is not located within any oil or gas field, and no oil or natural gas wells were located on the Project Site. However, the Project Site is located within a designated Methane Buffer Zone as mapped by the City.¹⁷ 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. In addition, as the Project Site is located in a Methane Buffer Zone, the Project would be required to comply with the City's methane ordinance (Ordinance No. 175790), which requires site testing for methane concentrations and soil gas pressures, and based on the results of such testing, may require a methane system to be integrated into the Project's design during construction. As such, with compliance with existing regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving methane gas. With regard to operation, the Project does not include the installation of oil wells. Additionally, development would comply with the City's methane ordinance. Therefore, operation of the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts associated with oil wells and methane gas would be less than significant.

(8) Hazards Near Schools

The nearest school to the Project Site is SEA Charter High School, Downtown, located approximately 290 feet northeast of the Project Site. As discussed above, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of residential developments. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Furthermore, all 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. As such, the use of such materials would not create a significant hazard to nearby schools, and impacts would be less than significant.

¹⁷ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5144-010-401, -405, -408, -421, -422, -423, and -425.

(9) Hazard Databases

The Project Site was identified on the following databases: Resources Conservation and Recovery Act—Small Quality Generators, RCRA Non-Generator, Federal Facility Index System Data Systems/Enforcement and Compliance History Online, Emergency Response Notification System, State Hazardous Waste Information System, County Hazardous Materials Management, Emissions Inventory Data, AST, California Environmental Reporting System, and Historical Cleaners. However, as concluded in the Phase I ESA, the Project Site does not appear on any databases of known or suspected releases. As such, these listings do represent an REC. Impacts regarding the identification of the Project Site on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would be less than significant.

(10) Hazards Associated with Airports

The Project Site is not located within 2 miles of an airport or a private airstrip or located within an airport land use plan and would not result in a safety hazard or excessive noise. Therefore, as concluded in the Initial Study, no impacts would occur.

(11) Emergency Access

It is expected that construction fences may encroach into the public right-of-way (e.g., sidewalks and roadways), the adjacent sidewalk, parking/right-turn lane, and one travel lane on Hope Street would temporarily be utilized as a staging area for construction equipment adjacent to the Project Site. However, with implementation of the Construction Traffic Management Plan (CTMP) (Project Design Feature TR-PDF-1) emergency access would not be impeded. With regard to operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Project site or surrounding area as set forth in California Vehicle Code (CVC) 21806(a)(1). In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. Therefore, with compliance with applicable regulatory requirements, the Project would not impede emergency access within the Project site or vicinity that could cause an impediment along City designated disaster routes such that the Project would impair the implementation of the City's emergency response plan.

(12) Wildland Fires

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.¹⁸ Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. 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.

h. Hydrology and Water Quality

(1) Surface Water Quality

During construction, the Project would be required by the City to put in place an erosion control plan (Local SWPPP) consisting of Best Management Practices (BMPs) for the full duration of Project construction activities. 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. In addition, as discussed in the Initial Study, Project construction activities for the new tower are expected to encounter groundwater. While dewatering during construction is not anticipated since the seepage water anticipated in the perched layers can be handled with temporary subdrains and subsequently the permanent retaining wall subdrainage system, in the event dewatering is required, temporary dewatering systems such as dewatering tanks, sand media particulate, pressurized bag filters, and cartridge filters would be utilized in compliance with the National Pollutant Discharge Elimination System (NPDES) permit. As concluded in the Initial Study, with the implementation of site-specific BMPs included as part of the Local SWPPP required to comply with the City's grading permit regulations, construction of the Project would not result in discharges that would violate any surface water quality standard or waste discharge requirements.

During operation, the Project would introduce sources of potential stormwater pollution that are typical of residential developments (e.g., sediment, nutrients, pesticides, metals, pathogens, and oil and grease). 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"). The implementation of BMPs required by the City's LID Ordinance would target the

¹⁸ *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5144-010-401, -405, -408, -421, -422, -423, and -425.*

pollutants that could potentially be carried in stormwater runoff. Therefore, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. Implementation of the proposed BMP system would result in the treatment of the entire required volume for the Development Area and the elimination of pollutant runoff up to the 85th percentile storm event. Therefore, with the incorporation of LID BMPs, 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.

(2) Groundwater

Project construction activities for the new tower are expected to encounter groundwater. While dewatering during construction is not anticipated since the seepage water anticipated in the perched layers can be handled with temporary subdrains and subsequently the permanent retaining wall subdrainage system, in the event dewatering is required, a temporary dewatering system would be installed and operated in accordance with NPDES requirements. Any discharge of groundwater during construction of the Project would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. Other potential effects to groundwater quality could result from the presence of an UST or during the removal of a UST. While no UST or USTs are anticipated to be present within the Development Area, in the unlikely event that USTs are found, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. Additionally, in the event contaminated soils are encountered during construction, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166. Furthermore, the Project would comply with all applicable requirements concerning the handling, storage and disposal of hazardous waste, which would reduce the potential for the construction of the Project to release contaminants into groundwater. As such, 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.

With respect to operation, the Project would not introduce any new USTs that would have the potential to expose groundwater to contaminants. In addition, the Project would comply with all applicable existing regulations that would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated. Furthermore, the Project includes the installation of a capture and use system as a means of treatment and disposal of the volume of water produced by the greater of the 85th percentile storm or the 0.75-inch storm event, which would allow for treatment of the on-site

stormwater. Therefore, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade ground water quality, and impacts on groundwater quality during operation would be less than significant.

With regard to groundwater recharge, the Development Area's existing conditions are approximately 100-percent impervious and there is minimal groundwater recharge potential. With implementation of the Project the impervious area within the proposed Development Area would be reduced 85-percent. As previously discussed, any stormwater that bypasses the capture and use system would discharge to an approved discharge point in the public right-of-way and would not result in infiltration of a large amount of rainfall that would affect groundwater hydrology, including the direction of groundwater flow. Therefore, as concluded in the Initial Study, the Project would not interfere substantially with groundwater recharge such that groundwater management would be impeded, and impacts would be less than significant.

(3) Drainage and Flooding

Construction activities for the new tower have the potential to temporarily alter existing drainage patterns and flows within the Project Site by exposing 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 specifies BMPs and erosion 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. With respect to operation, the amount of impervious area within the Development Area is expected to be reduced to approximately 85-percent from 100-percent. As stated in the Hydrology Report, included as Appendix IS-6 of the Initial Study, surface water runoff from the Project would be directed to the existing 36-inch City owned storm drain line that runs along the west side of 8th Street. Furthermore, in accordance with requirements of the City's LID Ordinance, BMPs would be implemented throughout the operational life of the Project to reduce erosion. Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion or siltation on-site or off-site would occur, and impacts would be less than significant.

Construction activities for the new tower have the potential to temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. As noted above, the Project would implement a Local SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. Thus, through compliance with applicable City grading permit regulations, construction

activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in flooding on- or off-site. As discussed above, the Development Area is approximately 100-percent impervious. With implementation of the Project, the amount of impervious area within the Development Area is expected to be reduced to approximately 85-percent. Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Development Area, the Project is expected to include the installation of capture and use system as established by the LID Manual. The installed BMP systems would be designed with an internal bypass or overflow system to prevent upstream flooding due to large storm events. The stormwater which bypasses the BMP systems would discharge to an approved discharge point in the public right-of-way. Therefore, with implementation of BMPs to capture and treat stormwater that are not currently present within the Development Area, the Project would decrease the rate or amount of surface runoff in a manner which would not increase runoff and not result in or otherwise increase the potential for flooding on- or off-site. Impacts would be less than significant.

The Project Site is not located within a designated 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or City.^{19,20} The Project Site is located within an area designated as FEMA Zone X, which denotes an area with 0.2-percent annual chance flood with average flood depths of less than 1 foot or with drainage areas of less than one mile. Therefore, as concluded in the Initial Study, the Project would not impede or redirect flood flows, and no impact would occur.

In addition, the Project Site is not mapped as being located within a City-designated flood control basin or within a potential inundation area. The Project Site is located approximately 13 miles east of the Pacific Ocean, and is not mapped as being located within an area potentially affected by a tsunami. As such, no tsunami or tsunami events would be expected to impact the Project Site. Therefore, the Initial Study concluded no impacts would occur.

(4) Compliance with Water Quality and Groundwater Plans

Furthermore, 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. Therefore, the Initial Study concluded that impacts would be less than significant.

¹⁹ *Federal Emergency Management Agency, Flood Insurance Rate Map, Panel Number 06037C1617G, effective on December 21, 2018.*

²⁰ *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5144-010-401, -405, -408, -421, -422, -423, and -425.*

i. Land Use and Planning (Physical Division of an Established Community)

The Project Site is located in an urbanized area and is currently developed with hotel and commercial uses and associated parking, as well as a portal that provides access to the Metro 7th Street/Metro Center Station. The area surrounding the Project Site is highly urbanized and includes a mix of mid- to high-rise buildings containing a variety of uses, including commercial (office, retail and restaurant), multi-family residential, institutional, and parking uses. The proposed uses and high-rise building would be consistent with other developments located adjacent to and in the general vicinity of the Project Site. Additionally, all proposed development would also occur within the boundaries of the Project Site. Furthermore, the Project Site is fully built out, and the Project does not propose a freeway or other large infrastructure that could divide the existing surrounding community. Therefore, as concluded in the Initial Study, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant.

j. Mineral Resources

No mineral extraction operations currently occur on the Project Site and none are proposed by the Project. 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 Surface Mining District 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. Therefore, the Initial Study concluded that no impacts related to mineral resources would occur.

k. Noise (Airport and Airstrip)

The Project Site is not located within the vicinity of a private airstrip or airport land use plan. Therefore, as concluded in the Initial Study, the Project would not expose people

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, 2018.*

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

working in the Project area to excessive noise levels from airports or airstrips, and no impacts would occur.

I. Population and Housing

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 anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project.

The Project would construct 466 new residential units. Based on generation factors from the LADOT's Vehicle Miles Traveled Calculator, the Project's new residential units would generate approximately 1,049 residents.²⁴ The estimated 1,049 new residents generated by the Project would represent approximately 0.40 percent of the population growth forecasted by SCAG's 2020–2045 RTP/SCS in the City of Los Angeles Subregion between 2022 and 2031. The Project's 466 residential households added by the Project would constitute approximately 0.35 percent of the housing growth forecasted between 2022 and 2031 by SCAG's 2020–2045 RTP/SCS. 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 that is jobs rich and well-served by transit.

With regard to employees, since the Project would not include the construction of uses that would generate a substantial number of new employment positions (e.g., new office or retail uses), the Project would not indirectly contribute to employment growth in the vicinity of the Project Site. 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 no housing currently exists on the Project Site, the Project would not cause the displacement of any persons or housing, or require the construction of housing elsewhere. Therefore, the Initial Study concluded no impacts related to displacement of people or housing would occur.

²⁴ *City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020.*

m. Public Services (Schools, Parks, and Other Public Facilities)

(1) Schools

The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). The Project Site is currently served by one primary center (Olympic Primary Center), one elementary school (10th Street Elementary), one middle school (John H. Liechty Middle School), and seven high schools (Belmont Zone of Choice High Schools²⁵). As previously discussed, the Project includes the construction of 466 new residential units. Based on LAUSD Student Generation rates, the Project would result in approximately 106 elementary students, 29 middle school students, and 61 high school students in the project area, for a total of approximately 196 students.²⁶ As such, the Project would create new demand for capacity at the LAUSD schools that serve the Project Site. 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, as concluded in the Initial Study, impact related to schools would be less than significant.

(2) Parks

Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. There are over 30 parks and recreational facilities within a 2-mile radius of the Project Site. The Project would provide approximately 54,750 square feet of open space, of which of which 44,750 square feet would be exterior open space. In addition, 13,600 square feet of the total exterior common open space would be landscaped. Overall, the Project's proposed open space would exceed the requirements of the LAMC. Due to the amount, variety, and availability of the proposed open space to be provided within the Project Site, it is anticipated that Project residents would often utilize on-site open space to meet their

²⁵ *Belmont Zone of Choice high schools include: Ramon C. Cortines School of Visual & Performing Arts, Edward R. Roybal Learning Center, Belmont Senior High, Miguel Contreras Learning Complex—Academic Leadership Community, Miguel Contreras Learning Complex—Business and Tourism, Miguel Contreras Learning Complex—School of Social Justice, and Miguel Contreras Learning Complex—Los Angeles School of Global Studies*

²⁶ *Los Angeles Unified School District, 2020 Developer Fee Justification Study, March 2020, Table 3.*

recreational needs. While the Project's residents and visitors would be expected to use off-site public parks and recreational facilities to some degree, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Therefore, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities. In addition, compliance with regulatory requirements, including the payment of park fees pursuant to LAMC Section 12.33 would ensure that the Project's potential impacts on parks would not be significant. Therefore, as concluded in the Initial Study, impacts related to parks would be less than significant.

(3) Libraries

The Project area is served by existing libraries within the Central City Community Plan area, including the Central Library, located 0.21-mile northeast of the Project Site. The new residential population generated by the Project may result in additional demand for library services provided by the Los Angeles Public Library (LAPL). However, while the new residents generated by the Project would be anticipated to make use of the various libraries serving the Project Site, not all residents would use the library or travel to the same library. Additionally, the Project's residential units would be equipped to receive individual internet service, which provides information and research capabilities that studies have shown to reduce demand at physical library locations. The LAPL also provides access to a variety of web-based collections, reducing the demand for physical library locations. Furthermore, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, and business tax, etc.) that could be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the Project Site and vicinity, as deemed appropriate.²⁷ The Project's revenue to the General Fund would help offset the Project-related increase in demand for library services. Therefore, as concluded in the Initial Study, impacts related to libraries would be less than significant.

n. Recreation

As described above, many public parks and recreational facilities are located in the vicinity of the Project Site. As previously discussed, while the population increase associated with the Project could generate additional demand for parks and recreational facilities in the vicinity of the Project Site, the Project would comply with the City's requirements in LAMC Section 12.33 through the payment of park fees. In addition, the Project would comply with applicable open-space requirements with respect to the Project's

²⁷ *City Administrative Officer, City of Los Angeles 2016–2017 Budget Overview, July 2016.*

residential component. As discussed above, the Project would provide approximately 54,750 square feet of open space, of which of which approximately 44,750 square feet would be exterior open space. In addition, approximately 13,600 square feet of the total exterior common open space would be landscaped. Overall, the Project's proposed open space would meet or exceed the requirements of the LAMC. Due to the amount, variety, and availability of the proposed open space and recreational amenities provided within the Project Site it is anticipated that Project residents and employees would often utilize on-site open space and common areas to meet their recreational needs. Thus, while the Project's residents would be expected to utilize off-site public parks and recreational facilities to some degree, the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. In addition, pursuant to Section 12.33 of the LAMC, the Applicant would be required to comply with applicable park fee requirements with regard to the residential component of the Project, which could be used to increase recreational opportunities for project residents and improve existing parks, both of which would reduce the Project residents' use of existing parks and recreational facilities and/or address any deterioration of those facilities. Therefore, as concluded in the Initial Study, the impact on parks and recreational facilities would be less than significant.

o. Transportation (Hazards Due to a Geometric Design Feature)

The Project would not introduce hazards due to incompatible uses such as farm equipment. Additionally, the Project would not include new vehicular access improvements. As previously discussed, access to the Project Site would continue to be provided from existing ingress/egress driveways on the southern portion of the Project Site, along Hope Street, 8th Street, and Flower Street. Therefore, as concluded in the Initial Study, impacts to hazards due to geometric design features would be less than significant.

p. Utilities and Service Systems (Wastewater, Stormwater, Telecommunications Facilities, and Solid Waste)

(1) Wastewater

Wastewater generated by the Project would be conveyed by 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),²⁸ and current average

²⁸ LASAN, *Water Reclamation Plants*, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p?_adf.ctrl-state=17rft0wb47_739&_adf.ctrl=&_afLoop=11943624721403694#!, accessed November 13, 2023.

wastewater flows are at approximately 300 mgd.²⁹ Accordingly, the remaining available capacity at the Hyperion Treatment Plant is approximately 150 mgd.³⁰ Based on sewage generation factors established by the City Department of Public Works, Bureau of Sanitation's (LASAN), the Project would generate a net increase of approximately 55,530 gallons of wastewater per day, or approximately 0.06 mgd, upon completion. The Project's average daily wastewater flow of 0.06 mgd would represent approximately 0.037 percent of the current 150 mgd available capacity of the HWRP. Therefore, Project-generated wastewater would be accommodated by the existing capacity of the HWRP.

As provided in the March 7, 2022 Wastewater Service Information Report, included as Exhibit 1 of the Wastewater Report, included as Appendix IS-8 of the Initial Study, the City determined that the existing capacity of the sewer system may be able to accommodate the additional wastewater infrastructure demand created by the Project. 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.

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

(2) Stormwater Drainage

As discussed above, the Project would result in an overall decrease in the amount of impervious surfaces within the Development Area. Specifically, with implementation of the Project the amount of impervious area is expected to be reduced from 100 percent to approximately 85 percent. As previously discussed, the Project Site currently does not have BMPs for the management of pollutants or runoff, the Project BMPs, required under the City's LID Ordinance, would control stormwater runoff and ultimately result in a minor decrease in runoff compared to existing conditions. Consequently, the Project would not increase the amount of stormwater runoff discharging into the existing storm drainage infrastructure. As such, the Project would not create runoff which would exceed the capacity of existing or planned drainage systems. Based on the above, 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

²⁹ *City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer System Management Plan Hyperion Sanitary Sewer System, January 2019.*

³⁰ $450 \text{ mgd} - 300 \text{ mgd} = 150 \text{ mgd}$

environmental effects. Therefore, as concluded in the Initial Study, impacts to stormwater facilities would be less than significant.

(3) Telecommunications

With respect to telecommunications facilities, the Project would require construction of new on-site telecommunications infrastructure to serve the new tower and potential upgrades and/or relocation of existing telecommunications infrastructure. 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 ensure vehicle and pedestrian access is maintained throughout construction. 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. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. As concluded in the Initial Study, no upgrades to off-site telecommunications systems are anticipated. Therefore, as concluded in the Initial Study, impacts to telecommunication facilities would be less than significant.

(4) Solid Waste

Pursuant to the requirements of SB 1374³¹, 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. In addition, 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. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, are disposed of in inert waste landfills. The permitted inert waste landfill serving the County is Azusa Land Reclamation. After accounting for mandatory recycling, the Project would result in approximately 981 tons of construction and demolition waste. This amount of construction and debris waste would represent approximately 0.002 percent of the Azusa Land Reclamation Landfill's remaining disposal capacity of 64.64 million tons. As such, the Azusa Land Reclamation landfill, the County's inert waste landfill, would be able to accommodate waste from the Project's construction activities.

³¹ *Senate Bill 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills.*

Upon full buildout, the Project would generate approximately 989 net tons of solid waste per year. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures, such as 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 does not include implementation of the City's recycLA franchising system. The Project's estimated solid waste disposal of 989 net tons per year represents approximately 0.0007 percent of the remaining capacity (132.58 million tons) at the County's Class III landfills that serve the City. 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 also be consistent with the applicable regulations associated with solid waste. Specifically, the Project residential tower would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size. The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. As concluded in the Initial Study, as the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts related to regulatory compliance would be less than significant.

p. Wildfire

The Project Site is located in an urbanized, generally flat area, and there are no wildlands or steep slopes located in the vicinity of the Project Site. As discussed above, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone.³² In addition, the Project Site is not located in or near State responsibility lands. Therefore, as concluded in the Initial Study, no impacts related to wildfire risks would occur.

³² *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5144-010-401, -405, -408, -421, -422, -423, and -425.*