

VI. Other CEQA Considerations

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1. Significant Unavoidable Impacts

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

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

As evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, and summarized below, should several of the related projects be constructed, sensitive uses would be present in the Project vicinity. In this case, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with regard to on-site and off-site noise and vibration (human annoyance) during construction and cumulative impacts with regard to on-site and off-site noise and off-site vibration (human annoyance) during construction. The Project would also result in off-site operational noise associated with vehicular traffic. All other impacts associated with the Project would be less than significant or reduced to less than significant with mitigation.

a. On-Site Construction Noise

As discussed in Section IV.H, Noise, of this Draft EIR, without mitigation, the estimated noise levels during construction would exceed the significance criteria at off-site receptor location R1 (the proposed mixed-use development at 2110 Bay Street) by up to 33.7 dBA and off-site receptor location R2 (the proposed mixed-use development at 2143 Violet Street) by up to 0.8 dBA. Implementation of Mitigation Measure NOI-MM-1, installation of temporary sound barriers, would reduce the Project-level noise generated by on-site construction activities by a minimum 5 dBA (i.e., from 65.7 dBA to 60.7 dBA) at the proposed mixed-use development at 2143 Violet Street north of the Project Site (receptor location R2) and by 15 dBA (i.e., from 97.3 dBA to 82.3 dBA) at the proposed mixed-use

development at 2110 Bay Street adjacent to the Project Site to the west (receptor location R1).¹ However, the construction-related noise would still exceed the significance threshold at receptor location R1 of 63.6 dBA. There are no other feasible mitigation measures that could be implemented to reduce the temporary noise impacts from on-site construction at receptor location R1. Therefore, Project-level construction noise impacts associated with on-site noise sources would remain significant and unavoidable. Cumulative impacts would also be significant and unavoidable if the proposed mixed-use development at receptor location R2 is built and occupied prior to construction of Related Project No. 9 and the Project. In the event the proposed mixed-use projects at receptor locations R1 and R2 are not built and occupied by or during Project construction, these project and cumulative impacts would be less than significant.

b. Off-Site Construction Noise

Project-related construction trucks would result in significant noise impacts along Bay Street between the Project Site and Santa Fe Avenue, based on the assumption that the proposed noise-sensitive uses along Bay Street (i.e., receptor locations R1 and R3) would be built and occupied prior to the Project construction. Specifically, noise levels from off-site construction would exceed the ambient noise levels along the haul route Bay Street (east of Santa Fe Avenue) by 5 dBA (i.e., from 2.8 dBA during the building construction phase to a maximum of 6.5 dBA during the grading/excavation phase). Additional truck trips associated with related projects would have the potential to increase the traffic noise and contribute to the cumulative noise impacts. There are no feasible mitigation measures that could be implemented to reduce this short-term impact because conventional mitigation measures, such as providing temporary noise barrier walls to reduce the offsite construction truck traffic noise impacts, would not be feasible as the barriers would obstruct the access and visibility to the properties along the anticipated haul routes. As such, Project-level and cumulative noise impacts from off-site construction would be significant and unavoidable.

c. On-Site Construction Vibration (Human Annoyance)

As discussed in Section IV.H, Noise, of this Draft EIR, estimated Project-level ground-borne vibration levels would be up to 99 VdB at receptor location R1, which would exceed the 72-VdB significance criterion pursuant to human annoyance. However, the vibration impact identified at receptor location R1 assumes the proposed mixed-use

¹ *The Project construction noise levels at receptor locations R1 and R2 would vary depending on the construction phase (i.e., demolition, grading, building construction, etc.). The pre- and post-mitigation Project construction noise levels identified here are during the demolition phase, which is the construction phase that would generate the highest noise levels (i.e., worst-case condition).*

development will be completed and occupied prior to or during Project construction. In the event the proposed mixed-use development is not built and occupied by or during Project construction, the vibration impact identified at receptor location R1 would be less than significant. As discussed in Section IV.H, there are no feasible mitigation measures that could be implemented to reduce the potential temporary vibration impacts from on-site construction associated with human annoyance to a less-than-significant level. Therefore, Project-level vibration impacts from on-site construction activities with respect to human annoyance would be significant and unavoidable.

d. Off-Site Construction Vibration (Human Annoyance)

Currently, there are no vibration-sensitive uses along the anticipated haul routes. However, Related Project Nos. 39 and 54 (i.e., receptor locations R1 and R3, respectively) would/have introduced sensitive receptors along the Bay Street segment of the haul route.² To provide a conservative analysis, the estimated vibration levels generated by construction trucks traveling along the anticipated haul route were assumed to be within 22 feet of the proposed sensitive uses along Bay Street. As evaluated in Section IV.H, Noise, of this Draft EIR, these proposed uses would be exposed to Project-level ground-borne vibration levels of approximately 74 VdB, which would reach the 72-VdB significance criterion. In addition, as some of the related projects would be anticipated to use similar trucks (i.e., large construction haul trucks) as the Project, it is anticipated that construction trucks associated with the some of the related projects would generate similar vibration levels along the anticipated haul route, which would add to the off-site construction vibration of the Project. Therefore, to the extent that other related projects use the same haul route as the Project, potential cumulative human annoyance impacts associated with temporary and intermittent vibration from haul trucks traveling along the designated haul routes would also be significant. Since there are no feasible mitigation measures that would reduce the potential vibration impacts with respect to human annoyance, Project-level and cumulative vibration impacts with respect to human annoyance as a result of off-site construction truck travel would be significant and unavoidable.

e. Off-Site Operational Noise

Cumulative noise impacts associated with operational off-site traffic would occur along Violet Street (east of Santa Fe Avenue), and Sacramento Street (east of Santa Fe

² *Related Project No. 39 is the 2110 Bay Street development located immediately west of the Project Site on Bay Street. Related Project No. 54 is the Soho House, which has already been developed, located at the southeast corner of Santa Fe Avenue and Bay Street. See Figure IV.I-3, Noise Measurement Locations, in Section IV.I, Noise, of this Draft EIR, which show the locations of noise receptor locations R1 and R3 (i.e., Related Project Nos. 39 and 54) relative to the location of the Project Site.*

Avenue). Conventional mitigation measures, such as providing noise barrier walls to reduce the off-site traffic noise impacts, would not be feasible as the barriers would obstruct the access and visibility to the properties along the impacted roadway segments. There are no other feasible mitigation measures to reduce the significant noise impacts associated with the cumulative off-site traffic.

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

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

As discussed in Section II, the purpose of the Project is to provide a vertical creative office campus for innovative media, entertainment, and technology companies. The purpose and objectives of the Project are closely tied to the goals and objectives of the Central City North Community Plan, which supports the objectives and policies of applicable larger-scale regional and local land use plans, including the Southern California Association of Government's (SCAG's) 2020–2045 Regional Transportation Plan/Sustainability Communities Strategy (2020–2045 RTP/SCS) and the City's General Plan.

The Project's general consistency with the applicable goals set forth in the 2020–2045 RTP/SCS is analyzed in Table 1 of Appendix I to this Draft EIR. As detailed therein, the Project would be generally consistent with the applicable goals set forth in the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating environmental effects. Specifically, the Project would support the goals of the 2020–2045 RTP/SCS to improve mobility, accessibility, reliability, and travel safety, as well as protect the environment and health of the region's residents by improving air quality and encouraging active transportation (e.g., bicycling and walking). The Project would be developed in an infill location within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is located within a City-designated Transit Priority Area (TPA) and is served by a variety of nearby mass transit options, including a number of bus lines. The Project would also provide bicycle parking spaces for the proposed uses that would serve to promote the use of bicycles and provide charging stations to serve electric vehicles. Furthermore, the Project would reduce per capita VMT within the Central Area

Planning Commission (APC) area.³ As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit, walking, and biking, and thereby improve the environment and health of nearby residents by supporting low and zero emission modes of transportation.

Furthermore, the Project would support the Central City North Community Plan's policy of new development needing to add to and enhance the existing pedestrian activity. The Project would enhance pedestrian activity within and around the Project Site by providing new sidewalks, street trees, ground floor commercial space with storefront glazing, and a lobby entrance for the office/creative office tenants along a pedestrian paseo. The paseo would allow pedestrians to cross the Project Site between Bay Street and Sacramento Street and would include landscaped planters and various gathering areas, including an outdoor courtyard that would serve as an open-air "forum" at the end of Bay Street. Additionally, the proposed uses would be located in an area well served by public transit, which would reduce vehicle miles travelled (VMT) and thereby help meet GHG emission goals. The Project would also support the Central City North Community Plan's objective to develop a project that achieves a high level of design and quality, distinctive character, and compatibility with existing uses and development. The Project would be designed to convey a classic industrial architecture that draws from elements of the surrounding neighborhood. Further, the Project would continue the area trend of re-using industrial lands, while remaining compatible with the industrial, warehouse, and commercial uses in the surrounding area. The Project would also support the Central City North Community Plan's goal to encourage alternative modes of transportation to the use of single occupant vehicles in order to reduce vehicular trips, as it would be developed in a TPA within close proximity to transit, reduce per capita VMT as discussed above, and include 78 bicycle parking spaces (28 short-term and 50 long-term).

In addition, the Project would implement a variety of sustainable features related to water conservation to reduce indoor water use, as set forth in Section II, Project Description, and Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. Furthermore, the Project would be required to reduce indoor water use by at least 20 percent, in accordance with the City of Los Angeles Green Building Code. The Project would also implement Project Design Feature WAT-PDF-1, which includes water conservation measures in excess of code requirements.

³ *The Mobility Group, 2159 Bay Street Transportation Assessment, July 2020. See Appendix M of this Draft EIR.*

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

Lastly, the Project would (1) redevelop a currently underutilized commercial site; (2) strengthen the Arts District's economic vitality by attracting new, highly skilled workers and new economy media, entertainment, and technology businesses; (3) provide additional opportunities for new commercial development and services through the development of a creative office project with a combination of indoor and outdoor spaces that is capable of attracting high-quality media and creative office tenants to the Arts District consistent with Central City North Community Plan Objective 2-1; and (4) provide community benefits, including, but not limited to, an outdoor courtyard, street trees and pedestrian improvements along the Project Site's Bay Street and Sacramento Street frontages, and a pedestrian paseo with retail/restaurant opportunities and gathering zones through the Project Site.

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

3. Significant Irreversible Environmental Changes

CEQA Guidelines Section 15126.2(c) indicates that an EIR should evaluate significant irreversible environmental changes that would be caused by implementation of a proposed project. As stated in CEQA Guidelines Section 15126.2(c), "[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway

improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

The Project would necessarily consume a limited amount of slowly renewable and non-renewable resources that could result in irreversible environmental changes. This consumption would occur during construction of the Project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that would include (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation. As demonstrated below, the Project would not result in a large commitment of nonrenewable 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 in Appendix A of this Draft EIR. As discussed therein, during construction of the Project, a minimum of 75 percent of construction and demolition debris would be diverted from landfills. 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 on-site recycling containers within a designated recycling area for Project residents to facilitate recycling in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687) and the Los Angeles Green Building Code. In accordance with Assembly Bill (AB) 1826, the Project would also provide for the recycling of organic waste. The Project would adhere to State and local solid waste policies and objectives that further goals to divert waste (for example, with at least a 50-percent waste diversion rate as required by AB 939 and the City’s Solid Waste Management Policy Plan). Thus, Project construction would not result in a large commitment of nonrenewable building materials, Project construction and operation would not result in a large commitment of solid waste disposal capacity, and significant irreversible environmental changes associated with building materials and solid waste would not occur.

b. Water

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

c. Energy Consumption

During ongoing operation of the Project, non-renewable fossil fuels would represent the primary energy source, and thus the existing finite supplies of these resources would be incrementally reduced. Fossil fuels, such as diesel, gasoline, and oil, would also be consumed in the use of construction vehicles and equipment. Project consumption of non-renewable fossil fuels for energy use during construction and operation of the Project is addressed in Section IV.C, Energy, of this Draft EIR. As discussed therein, construction activities for the Project would not require the consumption of natural gas but would require the use of fossil fuels and electricity. On- and off-road vehicles would consume an estimated total of 76,052 gallons of gasoline and approximately 273,689 gallons of diesel during the Project's construction period. For comparison purposes, the fuel usage during Project construction would represent approximately 0.001 percent of the 2023 annual on-road gasoline-related energy consumption and 0.03 percent of the 2023 annual diesel fuel-related energy consumption in Los Angeles County.⁴ Furthermore, as detailed in Section IV.C, Energy, of this Draft EIR, a total of approximately 22,797 kWh of electricity is

⁴ Refer to Appendix E of this Draft EIR for detailed energy calculations.

anticipated to be consumed during Project construction. However, when not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption; 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; and 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.

As indicated in Section IV.C, Energy, Project operation would consume energy related to the use of heating/ventilating/air conditioning (HVAC) equipment, refrigeration, lighting, the use of electrical equipment and machinery, water usage, solid waste disposal, and vehicle trips. Specifically, Project operation would consume an estimated 4,266,959 kilowatt hours of electricity per year, 3,252,133 cubic feet of natural gas per year, and 203,183 gallons of petroleum-based fuel per year, all after compliance with applicable conservation requirements (e.g., Title 24, CALGreen Code, etc.) and the additional conservation proposed by the Project (i.e., Project Design Features GHG-PDF-1, WAT-PDF-1 [LEED Silver], etc.). The Project's increase in electricity and natural gas demand would be within the anticipated service capabilities of LADWP and the Southern California Gas Company (SoCalGas), respectively. Specifically, the Project's electricity and natural gas demand would represent 0.02 and 0.0003 percent, respectively, of LADWP and SoCalGas' projected sales in 2025, while the Project's fuel demand would account for 0.003 percent of gasoline and diesel fuel consumption in Los Angeles County. In addition, multiple factors would reduce the Project's operational fuel use, including, but not limited to, its urban infill location within a TPA, its mixed-use nature, and the implementation of City-required transportation demand management (TDM) measures. Overall, as indicated in Section IV.C, Energy, compliance with applicable regulations, additional proposed energy conservation measures, and the infill and mixed-use nature of the Project, would reduce the Project's operational electricity demand by an estimated 8 percent, and the Project's operational transportation-related fuel demand by an estimated 36 percent.

Therefore, based on the above, the Project would not cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F of the CEQA Guidelines. In addition, Project operations would not conflict with adopted energy conservation plans.

d. Environmental Hazards

The Project's potential use of hazardous materials is addressed in the Initial Study for the Project, included in Appendix A of this Draft EIR and Section IV.E. Hazards and Hazardous Materials. 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 office

and commercial developments. Specifically, operation of the Project would be expected to involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and petroleum products. Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials used during construction and operation would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Additionally, any soil contamination, asbestos containing materials, or lead based paint encountered during demolition and construction would be handled and disposed of in compliance with applicable federal, State, and local regulations. Any associated risk would be reduced to a less-than-significant level through compliance with these standards and regulations. As such, compliance with regulations and standards would serve to protect against significant and irreversible environmental change that could result from the accidental release of hazardous materials.

e. Conclusion

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

4. Growth-Inducing Impacts

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

characteristics of projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Finally, the CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment. Growth can be induced or fostered as follows:

- Direct growth associated with a project;
- Indirect growth created by either the demand not satisfied by a project or the creation of surplus infrastructure not utilized by a project

a. Population

As discussed in Section II, Project Description, of this Draft EIR, the Project would include the construction of new creative office and retail/restaurant uses. As indicated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, since the Project does not propose a housing component, it would not directly induce a new residential population which would contribute to population growth in the vicinity of the Project Site.

b. Employment

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

Based on employee generation factors (i.e., rates) from the City of Los Angeles Department of Transportation (LADOT), it is estimated that the Project would generate approximately 781 net new employees on the Project Site.⁵ Based on a linear interpretation

⁵ LADOT and Los Angeles Department of City Planning (DCP), *City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020*. See Table IV.1.2-2 in Section IV.1.2 of this Draft EIR for calculations.

of employment data from the 2020–2045 RTP/SCS, an estimated 1,937,555 employees are projected within the City of Los Angeles in 2025, the Project’s buildout year, with 19,834 new employees between 2023 and 2025. The Project’s net increase of 781 employees would represent 0.04 percent of the total number of employees in 2025 and 3.93 percent of the growth between 2023 and 2025. Therefore, the Project would not cause an exceedance of SCAG’s employment projections contained in the 2020–2045 RTP/SCS.

In addition, as indicated in the Initial Study, while the employment opportunities generated by the proposed creative office, retail, and restaurant uses may be filled to some extent by employees already residing in the vicinity of the Project Site, it is also possible that some of the jobs created by the proposed uses would be filled by persons moving into the surrounding area, and housing demand associated with the Project could increase. However, it is anticipated that some of this demand would be filled by then-existing vacancies in the housing market, and some from other new units in nearby developments. Therefore, given that the Project would not directly contribute to population growth in the Project area and as some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. As such, the Project would not result in a notable increase in demand for new housing, and any new demand, should it occur, would be minor in the context of forecasted growth for the City of Los Angeles.

c. Infrastructure Improvements

The area surrounding the Project Site is already developed with a mix of commercial and industrial uses, and the Project would not remove impediments to growth. The Project Site, which is already developed with urban uses, represents an urban infill site located within an urban area that is currently served by existing utilities and roadway infrastructure. The Project would not result in the extension of utility or roadway infrastructure to areas not already served by such infrastructure. Although the Project would require connections of the proposed on-site utility infrastructure to the existing off-site water, sewer, electricity, and natural gas lines along the adjacent streets, these improvements would not include upgrades to the existing off-site infrastructure and would be limited to serving Project-related demand. Therefore, the Project would not remove existing obstacles to growth.

d. Conclusion

Overall, the Project would be consistent with SCAG’s growth forecast for the City of Los Angeles Subregion and would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of VMT. In addition, the Project would not require any major

utility or roadway improvements or open any large undeveloped areas for new use. Any access improvements would be limited to driveways necessary to provide immediate access to the Project Site, improve safety and walkability, and/or provide Americans with Disabilities Act (ADA) access. 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 identified in Section IV, Environmental Impact Analysis, of this Draft EIR. The mitigation measures are listed by environmental issue area consistent with how they are identified in Section IV, Environmental Impact Analysis, of this Draft EIR. As demonstrated by the analysis below, no significant secondary effects associated with the proposed mitigation measures would occur.

a. Geology and Soils (Paleontological Resources)

The following mitigation measures are identified in Section IV.D, Geology and Soils (Paleontological Resources), of this Draft EIR to avoid potentially significant Project impacts to paleontological resources. Mitigation Measure GEO-MM-1 requires the development of a site-specific Paleontological Resource Mitigation and Treatment Plan by a qualified paleontologist prior to earthmoving activities. Mitigation Measure GEO-MM-2 requires that prior to the start of any ground-disturbing activities, a preconstruction meeting take place during which the qualified paleontologist shall provide all construction personnel with paleontological sensitivity training via a Worker Environmental Awareness Program (WEAP). Mitigation Measure GEO-MM-3 requires that: a qualified professional paleontologist attend pre-construction meetings to consult with grading and excavation contractors, a paleontological monitor be on-site at all times during excavation where the original cutting of previously un-disturbed deposits of high paleontological resource potential (e.g., Quaternary old alluvial fan deposits) may occur to inspect exposures for contained fossils, and that the paleontological monitor have the authority to temporarily divert or direct ground-disturbing activities in the immediate vicinity of any find until they are assessed for scientific significance and collected). Mitigation Measure GEO-MM-4 requires

that: the paleontological monitor collect all significant paleontological resources encountered during monitoring, which will then be prepared in a properly equipped fossil-preparation laboratory to the point that specimens are ready for curation, and that specimens be identified to the finest taxonomic level that is reasonably possible before being sorted and catalogued as part of the mitigation program. Mitigation Measure GEO-MM-5 requires that at the conclusion of paleontological monitoring effort, the qualified professional paleontologist prepare a final report detailing the paleontological resources recovered, their significance, treatment, and arrangements made for their curation in a manner that meets the standards published by the Society of Vertebrate Paleontology.

These mitigation measures would represent procedural actions and would be beneficial in protecting paleontological resources at the Project Site. They could include some paleontological investigative and recovery work, but any such work would occur within the grading and excavation area of the Project and would not result in additional significant environmental effects. As such, implementation of these mitigation measures would not result in adverse secondary impacts.

b. Noise

Mitigation Measure NOI-MM-1 requires temporary and impermeable sound barriers to be installed during construction along the western property line of the Project Site between the construction areas and proposed mixed-use development at 2110 Bay Street on the west side of the Project Site (receptor location R1, a minimum 16-foot high sound barrier), and along the northeastern property line of the Project Site between the construction areas and proposed mixed-use development at 2143 Violet Street, north of the Project Site (receptor location R2, a minimum 8-foot high sound barrier).^{6,7} The noise and vibration from installation of the temporary sound barriers would be short-term and would be required to comply with the City's noise thresholds as described in Section 3.a.(1) of Section IV.H, Noise, of this Draft EIR. In addition, upon completion of construction, the temporary sound barriers would be removed. As such, implementation of this mitigation measure would not result in adverse long term secondary impacts.

Mitigation Measure NOI-MM-2 states prior to start of construction, the Applicant shall retain the services of a structural engineer or qualified professional to visit the existing single-story commercial/industrial buildings adjacent to the Project Site to the east and west to inspect and document the apparent physical condition of the buildings'

⁶ *In the event the 2110 Bay Street project is not completed and occupied prior to or during Project construction, this part of the mitigation measure shall not be required.*

⁷ *In the event the 2143 Violet Street project is not completed and occupied prior to or during the demolition phase of Project construction, this part of the mitigation measure shall not be required*

readily-visible features. Prior to construction, the Applicant shall retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a vibration monitoring program capable of documenting the construction-related ground vibration levels at the building during demolition and grading/excavation phases. In the event that a consent is not provided from the adjacent property owners, the vibration monitoring shall be made at the Project property line. The vibration monitoring at the Project property line would provide a more conservative reading, as it would be closer to the construction equipment. In the event the warning level (0.16 PPV) is triggered, the contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level, including but not limited to halting/staggering concurrent activities and utilizing lower vibratory techniques. In the event the regulatory level (0.20 PPV) is triggered, the contractor shall halt construction activities in the vicinity of the building and visually inspect the building for any damage. Results of the inspection must be logged. The contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level. Construction activities may then restart. This mitigation measure represents procedural actions and would be beneficial in protecting historic resources adjacent to the Project Site. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

c. Transportation

Mitigation Measure TR-MM-1 requires the preparation and implementation of a TDM Program that includes strategies to promote non-auto travel and reduce the use of single-occupant vehicle trips, subject to review and approval by LADOT. These TDM measures shall include parking cash-out; education and encouragement—promotions and marketing; commute trip reductions—ride-share programs; shared mobility—car-share and bike share; a contribution of money into the LADOT Bicycle Trust Fund for future improvements to the bicycle network and/or facilities in the Project area; and providing an on-site pedestrian paseo. Implementation of Mitigation Measure TR MM-1 would be beneficial in addressing the Project's transportation impacts during operation, with only the last TDM measure (providing an on-site pedestrian paseo) involving a specific physical improvement. This physical improvement is already included as part of the Project proposal and accounted for in the environmental analyses in this Draft EIR (for example, in the Project grading estimates and construction-related air quality analysis, the hydrology analysis as part of the Project's impervious surfaces, etc.). As such, implementation of Mitigation Measure TR-MM-1 would not result in adverse secondary impacts.

6. Effects Not Found to Be Significant

CEQA Guidelines Section 15128 states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the EIR. An Initial Study was prepared for

the Project and is included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City of Los Angeles determined through the Initial Study that the Project would not have the potential to cause significant impacts related to aesthetics; agriculture and forestry resources; air quality (odors); biological resources; cultural resources (human remains); geology and soils (except for paleontological resources); hazards and hazardous materials (routine transport of hazardous materials, hazardous emissions within 0.25 mile of a school, airport safety hazards, impairment of implementation of an emergency response/ evacuation plan, and wildland fires); hydrology and water quality (flood hazard area, flooding as a result of levee/dam failure, and inundation by seiche/tsunami/mudflow); land use and planning (physical division of an established community); mineral resources; noise (airport noise); population and housing; public services (schools, parks, and libraries); recreation; utilities and service systems (wastewater, telecommunications, and solid waste); and wildfire.⁸ A summary of the analysis provided in Appendix A for these issue areas is provided below.

a. Aesthetics

The Project Site is located within a relatively flat highly urbanized area, is currently developed with urban uses, and is surrounded on all sides by urban development. The Project would replace the existing low-rise development at the Project Site with a high-rise office building with ground-floor retail and restaurant uses and terraced open space areas, a two-story and one-story building with similar such uses, a pedestrian paseo, and five levels of parking (four subterranean and one ground floor level). With the introduction of the proposed building, short-range views from street-level vantage points adjacent to the Project Site would be modified. The building would be more prominently visible, would be taller, and would have more perceived bulk than the existing low-rise structures. However, given the location of the Project Site and existing dense intervening development, the proposed uses would not block public short-range views of visual resources, such as the nearby Los Angeles River or nearby historic resources. The increased height and mass of the buildings on the Project Site may be visible from more distant locations and may be within the same viewshed of the downtown Los Angeles skyline. However, given the distance to the downtown skyline, any such views are very limited and intermittent and are primarily only available from public roadways, and the Project would not completely

⁸ *In January 2018, OPR proposed comprehensive updates to the CEQA Guidelines which revised thresholds for aesthetics, air quality, cultural resources, geology and soils, hydrology and water quality, land use and planning, noise, population and housing, transportation, and utilities and service systems. Prior to the release of the revised thresholds, the question or threshold related to potential impacts to paleontological resources was considered under cultural resources. This threshold has since been moved and is now addressed under geology and soils.*

obscure views of the skyline. Thus, the Initial Study concluded that the Project would have a less-than-significant impact on scenic vistas.

The Project Site is not located along a state scenic highway. The nearest officially eligible state scenic highway is along the Foothill Freeway (I-210), approximately 9.2 miles to the northeast, and the nearest City-designated scenic parkway is along Stadium Way between the I-5 and I-110 Freeways, approximately 2.6 miles to the north. Therefore, the Initial Study concluded that the Project would not substantially damage scenic resources within a state or City-designated scenic highway and that no impact would occur.

The Project would remove three buildings and ancillary structures, none of which are historic or unique scenic resources, and would develop in their place a high-rise building, two low-rise buildings, and a pedestrian paseo. The design of the Project would convey a classic industrial architecture that draws from elements of the surrounding neighborhood and blends with the Arts District's industrial context and would incorporate staggered terraces and setbacks to visually break up the façade along Bay Street and Sacramento Street. In addition, the pedestrian paseo would create a pedestrian linkage between Bay Street and Sacramento Street, and most of the parking would be undergrounded with the one above-grade parking level screened. The proposed building would also not be out of character with the other mid-rise development in the area, and the proposed signage would be designed to be consistent with LAMC requirements and aesthetically compatible with the surrounding area. Overall, the Initial Study concludes that the impact on existing visual character would be less than significant.

The Project Site currently generates moderate levels of artificial light and glare typical of an urban area. Existing light sources within the Project Site include low-level security lighting, interior lighting emanating from the existing buildings, and vehicle headlights. Existing glare sources within the Project Site include glass and metal vehicle and building surfaces. The Project would introduce new sources of light and glare that are typically associated with commercial/office uses and that would be compatible with the existing buildings, including low-level exterior lighting on the buildings and along pathways for security and wayfinding purposes. Furthermore, the Project would include new low- and high-rise buildings, which would introduce an increased amount of nighttime lighting as compared to existing conditions. However, light levels from these buildings would be consistent with lighting from other nearby buildings. Thus, the Initial Study concludes that the Project would not create substantial light or glare that would adversely affect daytime or nighttime views in the area and that the impact would be less than significant.

It is noted that, pursuant to SB 743 [Public Resources Code (PRC) Section 21099(d)] and the City's Zone Information (ZI) File No. 2452, the Project's aesthetic impacts shall not be considered significant impacts on the environment. Specifically, pursuant to PRC Section 21099, the Project is a employment center project located on an

infill site. The Project Site is also located within a TPA because it is located within 0.5 mile of an existing “major transit stop.” Therefore, pursuant to SB 743 and ZI File No. 2452, aesthetic impacts, including impacts related to scenic vistas, scenic resources, visual character or quality, light, and glare, are not considered significant.

b. Agricultural and Forest Resources

The Project Site is located in an urbanized area of the City of Los Angeles and is currently developed with three buildings and other smaller on-site structures. The Project Site and surrounding area are not zoned for agricultural or forest uses, and no agricultural or forest lands occur on-site or in the Project area. As such, the Project would not convert farmland to a non-agricultural use, conflict with any zoning for agricultural uses or a Williamson Act Contract, conflict with existing zoning for, or cause rezoning of, forest land or timberland, result in the loss or conversion of forest land, or result in the conversion of farmland to non-agricultural use or in the conversion of forest land to non-forest use. Therefore, the Initial Study concluded that no impacts would occur.

c. Air Quality

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

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

In addition, construction and operation of the Project would comply with SCAQMD Rules 401, 402, and 403 regarding visible emissions violations.⁹ In particular, SCAQMD Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or

⁹ SCAQMD, *Visible Emissions, Public Nuisance, and Fugitive Dust*, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed December 6, 2021.

annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.¹⁰ Therefore, with compliance with existing regulatory requirements, the Project would not create odors that would adversely affect a substantial number of people.

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

d. Biological Resources

The Project Site is located in an urbanized area and is developed with three buildings and other smaller on-site structures, such as converted shipping containers, tents for welding operations and meetings, and parking stackers. Limited ornamental landscaping exists on-site. Due to the developed nature of the Project area, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Thus, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (USFWS). Also, there are no riparian or other sensitive natural communities, or federally protected wetlands as defined by Section 404 of the Clean Water Act on the Project Site. In addition, there are no established native resident or migratory wildlife corridors on the Project Site or in the vicinity. Accordingly, development of the Project would not impact any regional wildlife corridors or native wildlife nursery sites. Furthermore, no water bodies that could serve as habitat for fish exist on the Project Site. Although the Project Site is in proximity to the Los Angeles River, development of the Project would not have an adverse effect on any riparian habitat in the Los Angeles River since the Project would not encroach into the Los Angeles River and since the portion of the Los Angeles River near the Project Site is concrete lined. Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. As the USFWS database of conservation plans and agreements does not show any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans applicable to the Project Site, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans.

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

As discussed above, landscaping within the Project Site is limited. There are no trees located on-site or in the public right-of-way. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. In addition, in accordance with LAMC requirements, new trees would be planted within the Project Site. The planting of new tree species would be selected to enhance the pedestrian environment, convey a distinctive high quality visual streetscape, and complement trees in the surrounding area.

Overall, as discussed in the Initial Study, Project impacts on biological resources would be less than significant.

e. Cultural Resources (Human Remains)

The Project Site is located within an urbanized area and has been subject to previous grading and development, and the potential for uncovering human remains on the Project Site is low. Nevertheless, the Project would require grading, excavation, and other construction activities that could have the potential to disturb existing but undiscovered human remains. If human remains were discovered during construction of the Project, work in the immediate vicinity of the construction area would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5, which requires that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determined the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the person or persons it believes to be most likely descended from the deceased Native American. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. Therefore, due to the low potential that any human remains are located on the Project Site, and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, the Initial Study concluded that impacts related to human remains would be less than significant.

f. Geology and Soils¹¹

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

In addition, the Project would be constructed in accordance with the most current City of Los Angeles Building Code regulations and the recommendations of the design level geotechnical investigation for the Project included as Appendix IS-3 of the Initial Study which is included in Appendix A of this Draft EIR. As such, the Initial Study concluded that impacts related to strong seismic ground shaking would be less than significant.

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

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

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

¹¹ *Potential impacts associated with paleontological resources are analyzed in Section IV.D, Geology and Soils—Paleontological Resources, of this Draft EIR, in accordance with the 2018 OPR updates to the CEQA Guidelines.*

negligible since the Project Site would be developed and landscaped, which would prevent soil erosion. Therefore, the Initial Study concluded that impacts associated with soil erosion would be less than significant.

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

With regard to collapsible soils, the soils underlying the Project Site indicate mixtures of sand, silt, and clay, with varying amounts of gravel. Due to the type and density of the soils underlying the Project Site, the Project Site soils are not be considered collapsible soils in the Geotechnical Investigation. Therefore, the Project Site is not located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in collapse. Impacts associated with collapsible soils would be less than significant.

The Project Site is underlain with native alluvial soils that are typically dense or stiff and well consolidated, with expansion potential ranging from very low to low. Furthermore, construction of the Project would be required to comply with the California Building Code and supplemental requirements of the LAMC. As such, based on the depth of excavation and low expansion range of the onsite geologic materials, the Geotechnical Investigation concluded that the proposed structure would not be prone to the effects of expansive soils. In addition, the Project would not increase the expansion potential of these soils. Therefore, the Initial Study concluded that impacts related to unstable and expansive soils would be less than significant.

Project-generated wastewater would be conveyed to the existing public wastewater conveyance and treatment system rather than be disposed of using septic tanks or alternative wastewater disposal systems. As such, the Initial Study concluded that the Project would not result in impacts related to the ability of soils to support septic tanks or alternative wastewater disposal systems.

g. Hazards and Hazardous Materials

The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used for office and commercial uses. Specifically, operation of the proposed uses would be expected to involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and petroleum products. Construction of the Project would also involve the temporary use of potentially hazardous

materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials would be used and stored in accordance with manufacturers' instructions and used, handled, stored and disposed of in compliance with applicable federal, State, and local regulations. Therefore, the Initial Study concluded that any risk associated with the routine use, handling, storage and disposal of hazardous materials under the Project would be less than significant.

There are no schools located within 0.25 mile of the Project Site. Metropolitan High School is located approximately 0.35 mile west of the Project Site at 727 Wilson Street. As previously discussed, 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 mixed-use office and retail/restaurant developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed uses would be typical of office and retail/restaurant developments and would include small quantities of cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products rather than either large quantities of such materials or acutely hazardous materials or waste. The Project would also not include the development of industrial or other uses that would emit large amounts of chemicals or acutely hazardous materials. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and used, handled, stored and disposed of in compliance with applicable federal, State, and local regulations, including, but not limited to, federal and State Occupational Safety and Health Act requirements. As such, the use of such materials would not create a significant hazard to nearby schools. Therefore, the Initial Study concluded that impacts related to the emission of hazardous materials within 0.25 mile of a school would be less than significant.

The Project Site is not located within an airport land use plan or within two miles of a public airport or public use airport. The nearest airport is the Hawthorne Municipal Airport located approximately 9.3 miles southwest of the Project Site. As such, the Initial Study concluded that there would be no impacts related to airport hazards.

According to the Safety Element of the City of Los Angeles General Plan, the nearest emergency/disaster routes to the Project Site are the Hollywood Freeway (US-101), the Santa Monica Freeway (I-10), and the Golden State Freeway (I-5), which are all accessible within one mile of the Project Site along with Alameda Street, which is located approximately 0.6 mile west of the Project Site.¹² While it is expected that the

¹² *City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 1996, Exhibit H, Critical Facilities and Lifeline Systems.*

majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with the Project's Construction Management Plan and Worksite Traffic Control Plan prepared pursuant to Project Design Feature TR-PDF-1 that would be implemented to ensure adequate circulation and emergency access during construction. In addition, while the Project would generate traffic in the vicinity and result in some modifications to site access, the Project would comply with City of Los Angeles Fire Department (LAFD) emergency access requirements and would not impede emergency access within the vicinity. Thus, as discussed in the Initial Study, impacts related to implementation of an adopted emergency response plan would be less than significant.

There are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or within a City-designated fire buffer zone.^{13,14} Furthermore, the existing on-site uses would be removed, and the Project would be developed and operated, in accordance with LAFD requirements pertaining to fire safety. Additionally, the proposed creative office and retail/restaurant uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. 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 and the Initial Study concluded that there would be no impacts related to wildland fires.

h. Hydrology and Water Quality

The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City. The Safety Element of the City's General Plan does map the Project Site as being located within a potential inundation area of the Los Angeles River.¹⁵ The nearest levee is along the Los Angeles River located approximately 250 feet east of the Project Site. However, the U.S. Army Corps of Engineers operates and maintains the 22.5-mile stretch of the Los Angeles River

¹³ *City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166001002, 5166005008, 5166005009, 5166005010, and 5166005013, <http://zimas.lacity.org/>, accessed December 6, 2021. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.*

¹⁴ *City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.*

¹⁵ *City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G, p. 59.*

between Lankershim Boulevard in Hollywood and Stuart and Grey Road in Downey, which includes the portion adjacent to the Project Site. With continued inspection, maintenance and flood control activities, the potential for substantial adverse impacts related to inundation at the Project Site due to proximity to the Los Angeles River would be less than significant. Therefore, the Initial Study concluded that impacts related to floor hazard areas would be less than significant.

There are no levees or dams in the Project vicinity. Therefore, the Initial Study concluded that impacts related to flooding as a result of levee, or dam failure would be less than significant.

The Project Site is located approximately 14 miles east of the Pacific Ocean and the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami.¹⁶ Therefore, no tsunami or tsunami events would be expected to impact the Project Site. Additionally, there are no standing bodies of water on or near the Project Site that could result in a seiche. Lastly, the Project Site is not located in or immediately downstream of an undeveloped hillside area and is, thus, not subject to potential mudflows. Therefore, the Initial Study concluded that impacts related to inundation by a seiche, tsunami, or mudflow would be less than significant.

i. Land Use and Planning

The Project Site is located in a highly urbanized area characterized by a mixture of low- and mid-rise buildings occupied by a mix of light industrial, heavy industrial, warehouse, and commercial uses. The Project would replace the three existing buildings on the Project Site with a new infill development. All proposed development would occur within the boundaries of the Project Site as it currently exists, and the Project does not propose a freeway or other large infrastructure that would divide a community. Furthermore, the Project would not close any existing public streets or otherwise create barriers to vehicular, pedestrian and bicycle movement (it would increase rather than decrease pedestrian access and circulation through the Project Site). Therefore, the Initial Study concluded that impacts related to the physical division of an established community would be less than significant.

¹⁶ *City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G, p. 59.*

j. Mineral Resources

No mineral extraction operations currently occur on or in the immediate vicinity of the Project Site. The Project Site is located within an urbanized area and is currently developed with and surrounded by urban uses. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey. The Project Site is also not located within a City-designated oil field or oil drilling area. Therefore, the Initial Study concluded that no impacts related to mineral resources would occur.

k. Noise

The Project Site is not located within the vicinity of a private airstrip or within two miles of a public airport or public use airport. The nearest airport is the Hawthorne Municipal Airport located approximately 9.3 miles southwest of the Project Site. Therefore, the Project would not expose people residing or working in the Project area to excessive airport noise. As such, the Initial Study concluded that no impacts would occur related to airport noise.

l. Population and Housing

The Project Site is currently occupied by three buildings used for engineering and test development operations, office operations, and fabrication and machining operations, and no housing currently exists on the Project Site. The Project would not displace any existing people or housing that would necessitate the construction of replacement housing elsewhere. Therefore, the Initial Study concluded that no impact would occur related to population or housing displacement.

The Project would include the construction of new creative office and retail/restaurant uses. Since the Project does not propose a housing component, it would not directly induce a new residential population which would contribute to population growth in the vicinity of the Project Site or the Central City North Community Plan area. However, the Project would have the potential to generate indirect population growth in the vicinity of the Project Site as a result of the employment opportunities generated by construction and operation of the Project. Regarding construction-related employment, while construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, project-related construction workers would not be expected to relocate their household's place of residence as a consequence of working on the Project or result in a substantial increase in housing demand.

Regarding operations-related employment, based on employee generation factors (i.e., rates) from LADOT's VMT Calculator Documentation, it is estimated that the Project would generate approximately 781 net new employees on the Project Site.¹⁷ Based on a linear interpretation of employment data from the 2020–2045 RTP/SCS, an estimated 1,937,555 employees are projected within the City of Los Angeles in 2025, the Project's buildout year, with 19,834 new employees between 2023 and 2025. The Project would represent approximately 0.04 percent of the total number of employees in the City in 2025, and approximately 3.93 percent of the growth in employees in the City between 2023 and 2025. Therefore, the Project would not cause an exceedance of SCAG's employment projections contained in the 2020–2045 RTP/SCS. Furthermore, as indicated in the Initial Study, (1) some of the jobs created by the Project would be filled by persons already residing within the area; and (2) while some of the jobs created by the Project would be filled by persons moving to the Project area for employment, it is anticipated that some of the associated demand for housing would be filled by then-existing vacancies in the housing market and others by any new residential developments that may occur in the vicinity of the Project Site. Therefore, given that the Project would not directly contribute to population growth in the Project area, and as some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, the potential growth associated with Project operational employees who may relocate their place of residence would not be substantial.

Lastly, the Project would represent infill development on an urban infill site that is already served by fully developed roadway and utility infrastructure systems, and the project would not extend roads or utility infrastructure to areas not already served by such infrastructure.

Based on the above, the Initial Study concluded that the Project would not induce substantial population growth, and impacts would be less than significant.

m. Public Services

(1) Schools

The Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of students within the service area of LAUSD from the introduction of a residential population. In addition, the number of students that may be indirectly generated by the Project that

¹⁷ LADOT and Los Angeles Department of City Planning (DCP), *City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020*. See Table IV.1.2-2 in Section IV.1.2 of this Draft EIR for calculations.

could attend LAUSD schools serving the Project Site would not be anticipated to be substantial because not all employees of the Project are likely to reside in the vicinity of the Project Site. Furthermore, pursuant to Government Code Section 65995, 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 removes Project-related school impacts. As such, the Initial Study concluded that impacts would be less than significant.

(2) Parks

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create a demand for parks. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks. In addition, Project employees would be more likely to use parks near their homes during non-work hours. Furthermore, the Project would include a variety of open space for employees and visitors. On the ground floor, the Project would provide a publicly accessible pedestrian paseo system with potted plants and various gathering spaces, including an outdoor courtyard that would serve as an open-air "forum" at the end of Bay Street. The paseo would also allow access through the Project Site between Bay Street and Sacramento Street. In addition, a landscaped outdoor terrace on Level 10 of the proposed high-rise building would be available for use by Project tenants and would offer views of Downtown. Therefore, the Initial Study concluded that the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks or the need for new or physically altered parks and that impacts would be less than significant.

(3) Libraries

The Project area is served by the Benjamin Franklin Branch Library, located approximately 1.23 miles northeast of the Project Site.¹⁸ In addition, two other Los Angeles Public Library (LAPL) libraries are located in the Project vicinity, including the Little Tokyo

¹⁸ *Los Angeles Public Library, Locations and Hours, www.lapl.org/branches?distance%5Bpostal_code%5D=90038&distance%5Bsearch_distance%5D=2&distance%5Bsearch_units%5D=mile&field_branch_resources_services_tid=All, accessed December 6, 2021.*

Branch Library (located 1.8 miles to the northwest) and the Los Angeles Central Library (located 2.4 miles to the northeast). As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the demand for LAPL library facilities and services. In addition, while Project employees would generate some indirect demand for LAPL library facilities and services, they would have internet access to LAPL and other web-based resources, decreasing the demand on library facilities. Furthermore, as Project employees would be more likely to use library facilities near their homes during non-work hours and given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library services. Therefore, the Initial Study concluded that the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities or the need for new or physically altered library facilities, and that impacts would be less than significant.

n. Recreation

As discussed above, the Project does not propose the development of residential uses which would create a demand on nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create a demand for parks and recreational facilities. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks and recreational facilities. The Project would also provide on-site open space. Specifically, the Project would provide a publicly accessible pedestrian paseo system with potted plants and various gathering spaces including an outdoor courtyard that would serve as an open-air “forum” at the end of Bay Street). In addition, Project employees would be more likely to use parks near their homes during non-work hours. Therefore, the Initial Study concluded that 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 and that impact would be less than significant.

o. Utilities and Service Systems

(1) Wastewater

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Water Reclamation Plant

(HWRP). The HWRP has a capacity of 450 million gallons per day (mgd), and current average wastewater flows are at approximately 275 mgd.¹⁹ Accordingly, the remaining available capacity at the HWRP is approximately 175 mgd. The Project would generate a net increase in wastewater flow from the Project Site of approximately 34,713 gpd, or approximately 0.035 mgd.²⁰ The Project's increase in average daily wastewater flow of 0.035 mgd would represent approximately 00.020 percent of the current estimated 175 mgd of remaining available capacity at the HWRP. Therefore, the Project-generated wastewater would be able to be accommodated by the existing capacity of the HWRP. Furthermore, wastewater flows from the Project would be typical of creative office and retail/restaurant developments and would not include industrial discharges that could potentially interfere with the HWRP's ability to meet the water quality requirements of its discharge permit. Therefore, as concluded in the Initial Study included in Appendix A of this Draft EIR, and the Utility Infrastructure Technical Report for Wastewater included in Appendix P of this Draft EIR, (1) adequate wastewater treatment capacity exists to serve the Project; (2) the Project would not require new or expanded wastewater treatment facilities, the construction of which could cause significant environmental effects; and (3) the Project would not exceed the wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board (LARWQCB).²¹ Thus, the Initial Study concluded that less-than-significant impacts would occur in terms of these issues.

Sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing sewer mains adjacent to the Project Site. As discussed in the Wastewater Report, there is currently an existing 8-inch vitrified clay pipe (VCP) sewer main in Bay and an 8-inch VCP sewer main in Sacramento Street, both flowing west.²² According to the Wastewater Report, a Sewer Capacity Availability Report (SCAR) was submitted to LASAN to see whether the above public sewer main would be able to accommodate the net increase in wastewater that would be generated by the Project. It was assumed that approximately half of the proposed sewer discharge would go into the Bay Street sewer, with the remainder going to the Sacramento Street sewer. LASAN analyzed the Project demands in conjunction with existing conditions and forecasted growth in the SCAR and approved the Project to discharge up to 36,083 gpd of wastewater

¹⁹ LASAN, *Water Reclamation Plants, Hyperion Water Reclamation Plant*, www.lacitysan.org/san/faces/wcnav_externalld/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=vm8qwyj80_4&_afLoop=18606279438697733#!, accessed December 6, 2021.

²⁰ KPFF Consulting Engineers, *2159 Bay Street Utility Infrastructure Technical Report: Wastewater*, August 29, 2022. Included in Appendix P of this Draft EIR.

²¹ KPFF Consulting Engineers, *2159 Bay Street Utility Infrastructure Technical Report: Wastewater*, August 29, 2022. Included in Appendix P of this Draft EIR.

²² KPFF Consulting Engineers, *2159 Bay Street Utility Infrastructure Technical Report: Wastewater*, August 29, 2022.

to the Bay Street and Sacramento Street mains (as opposed to the net wastewater generation estimate for the Project of 34,713 gpd).^{23,24} Furthermore, as indicated in the Initial Study, (1) 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; and (2) Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. As such, the Project would not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. Therefore, as concluded in the Initial Study and the Wastewater Report, (1) adequate sewer capacity exists to serve the Project; and (2) the Project would not require new or expanded sewer facilities, the construction of which could cause significant environmental effects.²⁵ As such, impacts related to wastewater infrastructure were determined to be less than significant.

(2) Telecommunications Facilities

The Project Site is located in an area served by existing telecommunications infrastructure. Some telecommunications infrastructure improvements would be required to serve the Project. Installation of new telecommunications infrastructure would primarily take place on-site, with minor off-site work associated with connections to the existing system. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. However, the Project would prepare a Construction Management Plan and Worksite Traffic Control Plan pursuant to Project Design Feature TR-PDF-1, which would ensure safe pedestrian access, as well as emergency vehicle access and safe vehicle travel in general, to reduce any temporary pedestrian and traffic impacts occurring as a result of construction activities. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration (i.e., months) and would cease to occur when installation is complete. No upgrades to off-site telecommunications systems are anticipated to be required, and even if some upgrades to the existing telecommunications lines servicing the site would be required, it would not lead to significant environmental effects given the urban and fully built-out nature of the area and the implementation of Project Design Feature TR-PDF-1. Furthermore, any

²³ LASAN, *Sewer Capacity Availability Request for 2136 & 2159 Bay St. & 2145 Sacramento St.*, May 7, 2022. Included as Exhibit 1 of the Wastewater Report.

²⁴ KPFF Consulting Engineers, *2159 Bay Street Utility Infrastructure Technical Report: Wastewater*, August 29, 2022. Included in Appendix P of this Draft EIR.

²⁵ KPFF Consulting Engineers, *2159 Bay Street Utility Infrastructure Technical Report: Wastewater*, August 29, 2022. Included in Appendix P of this Draft EIR.

work that may affect services to the existing telecommunications lines would be coordinated with service providers. As such, the Project would not require new or expanded telecommunications facilities, the construction of which would result in significant environmental effects. Therefore, impacts would be less than significant.

(3) Solid Waste

The construction activities necessary to build the Project would generate debris, some of which may be recycled to the extent feasible. Pursuant to the requirements of Senate Bill (SB) 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. After accounting for mandatory recycling, the Project would result in approximately 870 tons of construction and demolition waste. Given the remaining permitted capacity the Azusa Land Reclamation facility, which is approximately 58.84 million tons, as well as the remaining 148.40 million tons of capacity at the Class III landfills serving the County, the Initial Study concludes that the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs, and that the impact would be less than significant.²⁶

As shown in Table VI-1 on page VI-33, upon full buildout, the Project would generate approximately 320 tons of solid waste per year when accounting for the removal of the existing land uses and associated existing operational solid waste generation. 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 and compliance with AB 341, which requires California commercial enterprises and public entities that generate four or more cubic yards per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste LA franchising system, which is expected to result in a reduction of landfill Disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.²⁷ The

²⁶ *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.*

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

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

Building	Size	Employee Generation Rate per ksf^a	Estimated No. of Employees	Solid Waste Generation Rate^b	Total Generation (tons/year)
Existing					
Office	7,106 sf	4.0	28 emp	0.37 tn/emp/yr	11
Creative Office/Office	16,000 sf	4.0	64 emp	0.37 tn/emp/yr	24
Light Industrial	16,222 sf	1.0	16 emp	1.67/lbs/emp/day	27
<i>Total</i>					61
Total to Be Removed					61
Proposed					
Creative Office	217,189 sf	4.0	869 emp	0.37 tn/emp/yr	321
Retail/Restaurant	5,000 sf	4.0	20 emp	2.98 tn/emp/yr ^c	60
Total Proposed					381
Total Net Increase					320
<p><i>sf = square feet</i> <i>emp = employees</i> <i>lbs = pounds</i> <i>ksf = thousand square feet</i> <i>tn/emp/yr = tons per employee per year</i></p> <p>^a <i>Employee Generation Rates from LADOT and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.</i></p> <p>^b <i>Non-residential yearly solid waste generation factors from LASAN City Waste Characterization and Quantification Study, Table 4, July 2002. Assumes rate of 0.37 tons per employee per year (Services—Business) for office uses and rate of 1.67 tons per employee per year (Manufacturing—Other) for light industrial use.</i></p> <p>^c <i>The LASAN solid waste generation rate for restaurant used here as it is greater than the solid waste generation rate for retail and thus provides a conservative estimate.</i></p> <p><i>Source: Eyestone Environmental, 2022.</i></p>					

estimated annual net increase in solid requires California commercial enterprises and public entities that generate 4 cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Solid waste that would be generated by the Project would represent approximately 0.0002 percent of the remaining capacity for the Class III landfills serving the County.²⁸ The Project's estimated solid waste generation would, therefore, represent a nominal percentage of the remaining daily disposal capacity of the County's Class III landfills. As such, the landfills that serve the

²⁸ $(320 \text{ tons per year} / 148.40 \text{ million tons}) \times 100 = 0.0002 \text{ percent}$

Project have sufficient permitted capacity to accommodate the solid waste that would be generated by Project operation and that the impact would be less than significant.

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

p. Wildfire³⁰

There are no wildlands located in the vicinity of the Project Site; the Project Site is an urban infill site located within an urban area and surrounded on all sides by urban development. As discussed above, in Section 6.g, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or fire buffer zone.^{31,32} In addition, the Project Site is not located near State responsibility lands. Therefore, no impacts related to the following would occur. Specifically, the Project would not result in: (1) the impairment of an adopted emergency response plan or emergency evaluation plan related to wildfire; (2) the exposure of Project occupants to pollutant concentrations from a wildfire; (3) the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or (4) the exposure of people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes.

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

³⁰ The 2018 Initial Study addressed wildfire under Hazards and Hazardous Materials in accordance with the version of CEQA Guidelines Appendix G in force at the time. This Wildfire section has been added here in accordance with the latest version of CEQA Guidelines Appendix G.

³¹ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5166001002, 5166005008, 5166005009, 5166005010, and 5166005013, <http://zimas.lacity.org/>, accessed December 6, 2021. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

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