

VI. Other CEQA Considerations

VI. Other CEQA Considerations

1. Significant Unavoidable Impacts

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

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

As evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, and summarized below, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with respect to on- and off-site noise sources during construction and on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance). Cumulative impacts associated with on- and off-site noise during construction and on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance) would also be significant and unavoidable.

a. On-Site Construction Noise

(1) Project-level Impacts

As discussed in Section IV.G, Noise, of this Draft EIR, Implementation of Mitigation Measure NOI-MM-1 (installation of temporary sound barriers) would reduce the Project's on-site construction noise levels to the extent feasible. Specifically, implementation of Mitigation Measure NOI-MM-1 would reduce the noise generated by on site construction activities at the off-site sensitive uses by a minimum of 20 dBA, 20 dBA, 6 dBA, 5 dBA, and 6 dBA at receptor locations R1, R2, R4, R5, and R6, respectively. The estimated construction-related noise levels at the uses represented by off-site sensitive receptor locations R4, R5, and R6 would be reduced to below a level of significance with implementation of Mitigation Measure NOI-MM-1. However, even with the implementation of Mitigation Measure NOI-MM-1, on-site construction-related noise levels at Receptors R1, R2, and R4 would exceed the

applicable noise criteria by 17.1, 1.7, and 0.0¹ average A-weighted decibels (dBA) during a 24-hour day (L_{eq}), respectively. In addition, the nighttime mat foundation pour would exceed the nighttime significance threshold (ambient plus 5 dBA) at receptor locations R1, R2 and R6 even with Mitigation Measure NOI-MM-1 by 13.9, 5.2, and 7.7 dBA, respectively. To be fully effective, the temporary noise barrier would need to be as high as the building (i.e., six stories), which would not be feasible as it would require a deep foundation with extensive structural engineering components and construction activities to erect, which would result in additional noise and vibration generation and other secondary impacts. In addition, the maximum noise reduction that would be provided by the sound barriers under Mitigation Measure NOI-MM-1 would be 20 dBA which would be below that required at Receptors R1 and R2. Therefore, temporary on-site construction noise impacts would remain significant and unavoidable.

(2) Cumulative Impacts

As discussed in Section IV.G, Noise, on-site construction-related noise levels from the related projects would be intermittent and temporary and it is anticipated that, as with the Project (under both development scenarios), the related projects would comply with the construction hours and other relevant provisions set forth in the LAMC. On-site noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual related project and compliance with locally adopted and enforced noise ordinances. However, there would be potential cumulative noise impacts at the nearby sensitive uses (e.g., residential uses) located in proximity to the Project Site and Related Project No. 1, in the event of concurrent construction activities. As such, cumulative noise impacts from on-site construction would be significant and unavoidable.

b. Off-Site Construction Noise

(1) Project-level Impacts

As discussed in Section IV.G, Noise, of this Draft EIR, noise impacts from off-site construction activities associated with the construction of the required water main upgrade along Detroit Street between Wilshire Boulevard and 8th Street and installation of the three new fire hydrants along Wilshire Boulevard and Cloverdale Avenue would be potentially significant. Temporary noise barriers, as specified in Mitigation Measure NOI-MM-1, would provide up to a maximum 10-dBA noise reduction at the off-site receptor locations. However, even with these temporary noise barriers, the estimated construction noise levels would still

¹ Noise barriers would not be effective in reducing the on-site construction noise at the upper levels of receptor location R4. Therefore, on-site construction noise impacts would remain significant and unavoidable. On-site construction noise levels shown for R4 are for the ground level of the building only.

exceed the significance criteria by up to 11.8, 13.0, and 1.9 dBA (L_{eq}) at receptor locations R1, R2, and R4, respectively. Therefore, temporary off-site construction noise impacts from the off-site construction activities would remain significant and unavoidable.

(2) Cumulative Impacts

As discussed in Section IV.G, Noise, of this Draft EIR, off-site construction haul trucks would have a potential to result in cumulative impacts if the trucks for the related projects and the Project were to utilize the same haul route. The estimated off-site construction noise levels from the Project would exceed the significance criteria along the anticipated truck routes, including Wilshire Boulevard and La Brea Avenue. Therefore, any additional number of trucks from the Project and related projects would incrementally increase the noise levels, which would contribute to cumulative impacts. Since the related projects are located along and near Wilshire Boulevard, these related projects could utilize the same truck routes as the Project. Therefore, cumulative noise due to construction truck traffic from the Project and other related projects has the potential to increase the ambient noise levels along the truck route by 5 dBA. Conventional mitigation measures, such as providing temporary noise barrier walls to reduce the off-site construction truck traffic noise impacts, would not be feasible as the barriers would obstruct the access and visibility to the properties along the anticipated truck routes. There are no other feasible mitigation measures to reduce the temporary significant noise impacts associated with the cumulative off-site construction trucks. As such, cumulative off-site noise impacts from off-site construction trucks would be significant and unavoidable.

c. On-Site Construction Vibration (Human Annoyance)

As analyzed in Section IV.G, Noise, of this Draft EIR, the estimated ground-borne vibration levels from on-site construction equipment would be below the significance criteria for human annoyance at all off-site sensitive receptor locations, except for receptor locations R1 and R2. The estimated ground-borne vibration levels at receptor locations R1 (up to 98.9 VdB) and R2 (up to 74.6 VdB), which would exceed the 72 VdB significance criteria during the demolition and grading/excavation phases with large construction equipment (i.e., large bulldozer, caisson drilling and loaded trucks) operating within 80 feet of receptor locations R1 and R2.

Mitigation measures considered to reduce vibration impacts from on-site construction activities with respect to human annoyance included the installation of a wave barrier, which is typically a trench, or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be very deep and long to be effective and are not considered cost effective for temporary applications, such as construction. In addition, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate ground-borne vibration

from the excavation equipment. Furthermore, it would not be technologically feasible to install a wave barrier along the public roadways for the off-site construction vibration impacts, as it is within the public right-of-way, over which the Applicant does not have control. As such, there are no technologically feasible mitigation measures to reduce the potential vibration human annoyance impacts from on-site construction activities. 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)

(1) Project-level Impacts

As discussed in Section IV.G, Noise, of this Draft EIR, the vibration significance criteria for human annoyance are 72 VdB for sensitive uses, including residential and hotel uses. It should be noted that buses and trucks rarely create vibration that exceeds 70 VdB at 50 feet from the receptor unless there are bumps in the road. The estimated vibration levels generated by construction trucks traveling along the anticipated haul route (i.e., Wilshire Boulevard and La Brea Avenue to US-101) were assumed to be within 24 feet of the sensitive use (i.e., residential and motel uses) along the anticipated truck routes (Wilshire Boulevard and La Brea Avenue). As indicated in the noise calculation worksheets included in Appendix G of this Draft EIR, the temporary vibration levels from off-site construction traffic could reach approximately 72.6 VdB periodically as trucks pass sensitive receptors along the anticipated haul route(s) at 24 feet. Therefore, the residential and motel uses along the anticipated haul routes would be exposed to ground-borne vibration levels up to 72.6 VdB, which would exceed the 72-VdB significance criteria from the construction trucks. In addition, the estimated vibration levels due to off-site construction equipment would be up to 87.9 VdB at receptor locations R1 and R2 (residential uses along Detroit Street) and up to 85.0 VdB at the receptor location R4, which would exceed the 72-VdB significance criteria with respect to human annoyance.

Mitigation measures considered to reduce vibration impacts from off-site construction equipment and trucks with respect to human annoyance included the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be very deep and long to be effective and are not considered cost effective for temporary applications, such as construction. In addition, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate ground-borne vibration from the excavation equipment. Furthermore, it would not be technologically feasible to install a wave barrier along the public roadways for the off-site construction vibration impacts, as it is within the public right-of-way, over which the Applicant does not have control. As such, there are no technologically feasible mitigation measures to reduce the potential vibration impacts from off-site construction trucks and equipment in terms of

human annoyance. Therefore, the Project's vibration human annoyance impact from off-site construction activities would be significant and unavoidable.

(2) Cumulative Impacts

As discussed in Section IV.G, Noise, of this Draft EIR, there are residential and motel uses along the Project's anticipated construction truck route, which would exceed 72 VdB as the trucks pass by within 24 feet of the sensitive receptors. There are related projects located along Wilshire Boulevard (i.e., Related Project Nos. 1, 2, and 4, which could utilize the same construction truck routes (i.e., Wilshire Boulevard and/or La Brea Avenue) during the same period as the Project. There are no feasible mitigation measures to reduce these potential vibration human annoyance impacts. Therefore, to the extent that other related projects use the same construction haul route as the Project, potential cumulative vibration impacts with respect to human annoyance associated with temporary and intermittent vibration from haul trucks traveling along the designated haul route would be significant and unavoidable.

As discussed above, potential vibration impacts associated with Project-related off-site construction activities for the off-site utility improvements would be significant with respect to human annoyance at receptor locations R1, R2, and R4. As analyzed above, the estimated ground-borne vibration due to Project off-site constructions were up to 87.9 VdB (at receptor locations R1 and R2) and up to 85.0 VdB (at receptor location R4), which exceeds the 72 VdB significance criteria. Since Related Project No. 5 is located adjacent to receptor location R2 and approximately 70 feet from receptor locations R1 and R4, there is a potential cumulative construction vibration impacts due concurrent construction. There are no feasible mitigation measures to reduce these potential vibration human annoyance impacts. Therefore, potential cumulative vibration impacts with respect to human annoyance associated with temporary and intermittent vibration from off-site construction activities would be significant and unavoidable.

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

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

As provided in Section II, Project Description, of this Draft EIR, the underlying purpose of the Project is to promote the revitalization of the Wilshire community and the surrounding

area redeveloping an infill site while preserving existing contributors to the Miracle Mile Historic District, and integrating high-density multi-family housing uses and ground floor commercial space in close proximity to a future rail station. As discussed in more detail below, the underlying purpose and associated objectives of the Project would support the objectives and policies of the Wilshire Community Plan, which supports the goal, objectives, and policies of applicable larger-scale regional and local land use plans, including the City of Los Angeles (City) General Plan Framework Element (Framework Element) and the Southern California Association of Governments (SCAG) 2024–2050 Regional Transportation Plan/Sustainability Communities Strategy (2024–2050 RTP/SCS). Provided below are summaries of the analyses of Project consistency with these plans contained in Section IV.F, Land Use, of this Draft EIR. Refer to Section IV.F for the full consistency analyses.

a. Wilshire Community Plan

The Project would support reducing vehicular trips and congestion by locating a mixed-use high-density residential and commercial development in close proximity to existing jobs, transit, and services. The Project is an urban infill site located within a City-designated Regional Center and Transit Priority Area (TPA) and SCAG-designated High Quality Transit Corridor (HQTC) in close proximity transit, including the Los Angeles County Metropolitan Transportation Authority (Metro) D Line Wilshire/La Brea Station across Detroit Street from the Project Site and variety of existing bus lines operated by Metro, Los Angeles Department of Transportation (LADOT), Antelope Valley Transit Authority, and DASH. As such, the Project's residents, employees, and visitors would have the opportunity to walk, bike, and ride transit to access the Regional Center and surrounding areas which would reduce vehicular trips and congestion.

The Project would provide new street trees featuring decorative lighting, enhanced sidewalk paving along the perimeter of the Project Site, bike racks, outdoor dining and seating areas, and landscaping. The Project would include low-level exterior lights adjacent to the building and along pathways that would serve to enhance the safety of pedestrians at night. Furthermore, as provided in Section IV.H.2, Public Services—Police Protection, of this Draft EIR, the Project would implement several design features to enhance safety within and immediately surrounding the Project Site including, but not limited to: security cameras; a dedicated security team for the residential tower; sufficient lighting of buildings and walkways as well as parking areas, elevators, and lobbies; and entrances, spaces around buildings, and pedestrian walkways that are designed to be open and visible from surrounding sites. These Project elements, together with the location of the Project Site within a TPA and in close proximity to transit, would promote a safe, comfortable, and accessible pedestrian experience for all and encourage pedestrian activity.

The Project would also support the City's goal to preserve and restore resources, neighborhoods, and landmarks which have historical and/or cultural significance.

Specifically, the Project would retain the existing buildings that are contributors to the Miracle Mile Historic District. Furthermore, with compliance with applicable regulations and implementation of Project Design Feature CUL-PDF-1 requiring an Historic Structure Report, all aspects of historic integrity associated with the on-site contributors would remain. As such, the Project would not result in a substantial adverse change in the significance of a historic resource and its impact would be less than significant.

Based on the above, the Project would support the applicable land use goals, objectives and policies of the Wilshire Community Plan.

b. Framework Element

The Project would contribute to the needs of the City's existing and future residents, businesses, and visitors by redeveloping an underutilized site with high-density housing, inclusive of 47 Extremely Low-Income affordable units, contributing towards the City's allocation under the SCAG Regional Housing Needs Assessment, and developing this housing within an existing employment center. The Project would also support the City's objective to provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services, where the residents' quality of life can be maintained or improved. Specifically, because the Project Site does not contain an existing residential use and is located in an area characterized by a wide variety of commercial and multi-family residential uses, the Project would not displace existing housing or intrude into an existing established residential neighborhood, while at the same time would contribute to growth in an area where there is sufficient public infrastructure to accommodate that growth (i.e., Wilshire Boulevard is a major urban corridor in the City). Residents of the Project and surrounding multi-family neighborhoods would also be provided streetscape improvements that would improve the pedestrian environment and enhance quality of life, including, but not limited to, new street trees featuring decorative lighting, enhanced sidewalk paving along the perimeter of the Site, bike racks, outdoor dining and seating areas, and landscaping. These improvements would serve to enhance the pedestrian environment and, together with the location of the Project on an urban infill site within a TPA and in close proximity to transit, would facilitate a reduction of vehicle trips and vehicle miles traveled. As such, the Project would support the applicable land use goals, objectives and policies of the General Plan Framework Element.

c. 2024–2050 RTP/SCS

The Project would support the goals of the 2024–2050 RTP/SCS related to improving mobility and accessibility, maximizing the productivity of transportation systems, supporting healthy and equitable communities by improving air quality and promoting active transportation (e.g., bicycling and walking), and encouraging energy efficiency. The Project would increase urban density on an already developed urban infill site in a City-designated

TPA and SCAG-designated HQTC in close proximity to jobs, shopping, services and transit (including the future Metro D Line Wilshire/La Brea Station across Detroit Street from the Project Site), and would be served by an established network of roads and freeways.

Furthermore, the Project would provide bicycle parking facilities meeting LAMC requirements as well as a bike repair station that would serve to promote use of bicycles; pedestrian enhancements including, but not limited to, new street trees featuring decorative lighting, enhanced sidewalk paving along the perimeter of the Project Site, outdoor dining and seating areas, and landscaping; electric vehicle charging receptacles in 419 residential parking spaces and in 3 commercial parking spaces in accordance with 2025 CALGreen requirements. The Project would also prohibit the use of natural gas within the building envelope during Project operations, excluding restaurant cooking equipment and the cost of residential parking will be unbundled from the cost of the residential units, with the exception of all Restricted Affordable Units, which will include any provided residential parking in the base rent or sales price. As such, the Project would be designed and constructed to incorporate features to support and promote environmental sustainability. Furthermore, the Project's Transportation Demand Management features would reduce the number of single occupancy vehicle trips and associated vehicle miles traveled (VMT), which would contribute to the reduction in greenhouse gas (GHG) emissions. Therefore, the Project would support the applicable land use goals, principles, and strategies of the 2024–2050 RTP/SCS adopted specifically to mitigate or avoid an environmental impact.

d. Conclusion

Based on the above, the Project would reflect a development that is consistent with the overall vision of the Wilshire Community Plan as well as with other primary land use plans such as the Framework Element and SCAG's 2024–2050 RTP/SCS. As such, the benefits of the Project as outlined above and described more fully in Section II, Project Description, of this Draft EIR, would outweigh the significant and unavoidable impacts of the Project (i.e., temporary construction-related noise and vibration impacts).

3. Significant Irreversible Environmental Changes

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

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

a. Building Materials and Solid Waste

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

The Project’s potential impacts related to solid waste are addressed in the Initial Study prepared for the Project, which is included as Appendix A of this Draft EIR. As discussed therein, 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 its non-hazardous demolition and construction debris. Furthermore, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project’s construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. In addition, during operation, the Project would provide adequate storage areas in accordance with the City’s Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size. The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Overall, the Project would adhere to State and local solid waste policies and objectives that further goals to divert waste. Thus, the consumption of non-renewable building materials, such as aggregate materials and plastics, would be reduced and the Project would not result in significant impacts regarding solid waste.

b. Water

Consumption of water during construction and operation of the Project is addressed in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this

Draft EIR. As discussed therein, the anticipated water demand associated with construction activities would be less than the net new water consumption of the Project at buildout. Furthermore, Project construction water demand would be temporary and would cease once construction activities are completed. During operation, the estimated water demand for the Project would not exceed the available supplies projected by the City of Los Angeles Department of Water and Power (LADWP), as confirmed by the Water Supply Assessment prepared by LADWP for the Project and included as Appendix H of this Draft EIR. The Project would also include water savings as required by City Ordinance No. 186,488, Ordinance No. 184,248, the Los Angeles Plumbing Code, and Los Angeles Green Building Code. In addition, the Project would implement Project Design Feature WAT-PDF-1, which would include water conservation measures in excess of code requirements, such as Energy Star-labeled appliances; high efficiency toilets; California Friendly® plants or native plants; drip/subsurface irrigation (micro-irrigation); proper hydro-zoning/zoned irrigation (groups plants with similar water requirements together); installation of a meter on the pool make-up line or leak detection system so water use can be monitored, and leaks can be identified and repaired; individual metering and billing for water use for residential and commercial units; and the use of grey water collection to meet 100% of the cooling tower make-up water requirements. Thus, as evaluated in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, while Project construction and operation would result in some irreversible consumption of water, the Project would not result in a significant impact related to water supply.

c. Energy Consumption

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

efficiency requirements. Therefore, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Thus, impacts related to the consumption of fossil fuels during construction of the Project would be less than significant.

During operation, the Project's increase in electricity demand would be within the anticipated service capabilities of LADWP, respectively. As detailed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project includes Project Design Feature GHG-PDF-1, which would prohibit the use of natural gas within the building envelope during Project operations, excluding restaurant cooking equipment. Removal of existing uses which consume natural gas would result in a net decrease in natural gas emissions.

With respect to electricity, as discussed in Section IV.C, Energy, of this Draft EIR, the Project would comply with Title 24 standards and applicable CALGreen Code requirements and City of Los Angeles Code requirements (e.g., requiring all new buildings be all-electric buildings with some exceptions).

With regard to transportation energy, as noted above, the Project is located on an urban infill site within an HQTC designated by SCAG and would include a number of features that would reduce the VMT such as increased density, employment opportunities, bicycle parking per code, pedestrian improvements, and increased destination and transit accessibility (including the newly opened Metro D Line Wilshire/La Brea Station). With incorporation of these measures and associated vehicle trips, net transportation-fuel usage would be reduced for both gasoline and diesel fuels.

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

d. Environmental Hazards

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

less than significant level through compliance with these standards and regulations. As such, compliance with regulations and standards would serve to protect against significant and irreversible environmental change that could result from the accidental release of hazardous materials.

The Project Site is located within a designated Methane Buffer Zone as mapped by the City. As concluded in the Initial Study, the Project Site does not contain significantly elevated concentrations of methane, and there would not be unacceptable health risk to Project occupants. In addition, adherence to standard construction safety measures, as well as compliance with California Occupational Safety and Health Act safety requirements, would serve to reduce the risk in the event that elevated levels of gases are encountered during grading and construction. In addition, as the Project is located in a Methane Buffer Zone, the Project would be required to comply with the City's Methane Mitigation Ordinance No. 175,790. As such, with compliance with existing regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving methane gas.

e. Conclusion

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

4. Growth-Inducing Impacts

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

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

a. Population

As discussed in Section II, Project Description, of this Draft EIR, the Project would develop 419 new residential units. Based on generation rates developed by the Department of City Planning and LADOT, the Project could generate a new residential population of approximately 943 residents.² According to SCAG's 2024–2050 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2023 was approximately 3,957,000 persons.³ As projected by the 2024–2050 RTP/SCS, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,031,700 persons in 2029, the projected occupancy year of the Project.⁴ Therefore, the projected population growth between 2023 and 2029 would be approximately 74,700 persons. The estimated 943 new residents generated by the Project would represent approximately 1.26 percent of the population growth forecasted by SCAG's 2024–2050 RTP/SCS in the City of Los Angeles Subregion between 2023 and 2029. Therefore, the Project's residents would be well within SCAG's 2024–2050 population projection for the City of Los Angeles Subregion.

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.

² Based on City of Los Angeles VMT Calculator Documentation (Version 1.3), May 2020, Table 1: Land Use and Trip Generation Base Assumptions. The rate of 2.25 persons per unit for "Multi-Family Residential" land use is applied to the 419 new residential units. Therefore, the Project would result in approximately 943 new residents.

³ Based on a linear interpolation of SCAG 2019-2035 data.

⁴ Based on a linear interpolation of SCAG 2019-2035 data.

Rather, the Project would provide a public benefit by providing new employment opportunities during the construction period.

Based on employee generation rates developed by the Department of City Planning and LADOT, the Project would generate approximately 26 net new employees.⁵ According to the 2024–2050 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2023 would be approximately 1,995,450 employees.⁶ As projected by the 2024–2050 RTP/SCS, the City of Los Angeles Subregion is anticipated to have approximately 2,057,625 employees in 2029, the projected occupancy year of the Project.⁷ Therefore, the projected employment growth in the City between 2023 and 2029 would be approximately 62,175 employees. Thus, the Project’s estimated 26 net new employees would constitute approximately 0.04 percent of the employment growth forecasted between 2023 and 2029. In addition, while some of the new employment positions could be filled by persons who would relocate to the vicinity of the Project Site, this potential increase in population would not be substantial since not all employees would move close to the Project Site. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project Site and other people would commute to the Project Site from other communities.

Overall, the provision of new jobs would constitute a small percentage of employment growth, would not be considered “unplanned growth,” and would not produce such a high quantity of new jobs that it would have the possibility to induce unplanned residential growth. Therefore, the Project would not cause an exceedance of SCAG’s employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities. As such, given that the Project would not directly contribute to substantial unplanned population growth in the Project area through the development of residential uses, and as some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site or who would commute, the potential growth associated with Project employees who may relocate their place of residence would not be substantial.

c. Utility Infrastructure Improvements

The area surrounding the Project Site is already developed with a mix of residential and commercial uses, and the Project would not remove impediments to growth. The Project Site is located within an urban area that is currently served by existing utilities and

⁵ *Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, May 2020, Table 1.*

⁶ *Based on a linear interpolation of SCAG 2019-2035 data.*

⁷ *Based on a linear interpolation of SCAG 2019-2035 data.*

infrastructure. While the Project would require local infrastructure to connect the Project Site to the mainlines, and would require both upgrading approximately 685 feet of the Detroit Street water main from a 6-inch line to an 8-inch line and installing three new fire hydrants that would connect to the existing water mains located along 8th Street, Cloverdale Avenue and Wilshire Boulevard to provide the required fire flow for the Project, such improvements would be limited to serving Project-related demand and would not necessitate major local or regional utility infrastructure improvements that have not otherwise been accounted and planned for on a regional level.

d. Conclusion

Overall, the Project would be consistent with the growth forecast for the City of Los Angeles Subregion and would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of VMT. In addition, the Project would not require any major roadway or utility infrastructure 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 and to improve safety and walkability. Therefore, direct and indirect growth-inducing impacts would be less than significant.

5. Potential Secondary Effects of Mitigation Measures

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

a. Geology and Soils

Mitigation Measure GEO-MM-1 requires that prior to the start of any ground-disturbing activities, a preconstruction meeting take place during which a Qualified Professional Paleontologist shall provide all construction personnel with paleontological sensitivity training via a Worker Environmental Awareness Program. Mitigation Measure GEO-MM-2 requires the development of a site-specific Paleontological Resource Mitigation and Treatment Plan by the Qualified Professional Paleontologist that specifies the levels and types of monitoring efforts based on the types and depths of ground disturbance activities and the geologic and

paleontological sensitivity of the Project Site, recovery protocols, sampling protocols for microfossils, laboratory procedures, reporting requirements, and curation provisions for any collected fossil specimens. Mitigation Measure GEO-MM-3 requires that the preparation of a post-construction Paleontological Monitoring Report detailing all aspects of the paleontological monitoring conducted for the Project and include the biostratigraphy, paleoecologic, and taphonomic significance of any paleontological resources discovered during construction.

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 southern property line of the Project Site between the construction areas and the residential uses adjacent to the Project Site to the south (receptor location R1); along the eastern property line of the Project Site between the construction areas and residential use on Detroit Street (receptor location R2); along the northern property line of the Project Site between the construction areas and residential uses on the north side of Wilshire Boulevard (receptor location R4) and the residential uses on Cloverdale Avenue (receptor location R5); along the western property line of the Project Site between the construction areas and residential and school use on Cochran Avenue (receptor location R6); during the off-site water main improvements construction along Detroit, between the construction equipment and both the residential uses along the east and west sides of Detroit Street between the Project Site and 8th Street (represented by receptors R1 and R2) and the residential use located at the northwest corner of Detroit Street and Wilshire Boulevard (R4); and during the off-site fire hydrant installation, between the construction equipment and the residential uses along Cloverdale Avenue (represented by receptor location R1). The noise and vibration from installation of the temporary sound barriers would be short-term and would occur within the specified construction hours and days permitted by the City's noise regulations. Furthermore, the sound barrier would reduce the Project's noise impacts from construction, and upon completion of construction the temporary sound barriers would be removed. As such, implementation of Mitigation Measure NOI-MM-1 would not result in additional significant secondary impacts.

Mitigation Measure NOI-MM-2 requires that the use of large construction equipment, including large bulldozer, caisson drill rig, and/or loaded trucks, shall be at a minimum of 13 feet away from the on-site historic structures such that the resulting construction vibration

level from the Project does not exceed 0.2 PPV. This mitigation measure would be procedural and beneficial in reducing the Project's construction vibration impact to the on-site historic structures. As such, implementation of Mitigation Measure NOI-MM-2 would not result in adverse secondary impacts.

Mitigation Measure NOI-MM-3 states prior to the start of Project construction, the Applicant shall retain the services of a structural engineer or qualified professional to visit the existing on-site historic buildings to inspect, document the apparent physical condition of the structures' readily visible features, review proposed construction equipment, and develop and implement a vibration monitoring program capable of documenting the construction-related ground vibration levels adjacent to the historic buildings at the Project Site during demolition and grading/excavation phases. In the event that the vibration warning level (0.17 PPV) is triggered, the contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level. In the event the vibration regulatory level (0.2 PPV) is triggered, the contractor shall halt the construction activities in the vicinity of the adjacent building structures and visually inspect the building for any damage (by a qualified structural engineer). 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

6. Effects Not Found to Be Significant

CEQA Guidelines Section 15128 states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the EIR. An Initial Study was prepared for the Project and is included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City determined through the Initial Study that the Project would not have the potential to cause significant impacts related to the impact areas listed below. Refer to the Initial Study included as Appendix A of this Draft EIR for a detailed analysis of these topic areas.

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality (odors)⁸

⁸ Impacts related to odors are also summarized in Section IV.A, Air Quality, of this Draft EIR.

- Biological Resources
- Cultural Resources (human remains)⁹
- Geology and Soils (geologic hazards)
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning (division of an established community)¹⁰
- Mineral Resources
- Noise (airport and airstrip noise)¹¹
- Population and Housing
- Public Services (schools, parks, libraries)
- Recreation
- Transportation (hazardous geometric design features, emergency access)¹²
- Utilities and Service Systems (stormwater, telecommunications, solid waste)
- Wildfire

⁹ *Impacts related to human remains are also summarized in Section IV.B, Cultural Resources, of this Draft EIR.*

¹⁰ *Impacts related to the physical division of an established community are also summarized in Section IV.F, Land Use, of this Draft EIR.*

¹¹ *Impacts related to airport and airstrip noise are also summarized in Section IV.G, Noise, of this Draft EIR.*

¹² *Impacts related to hazardous geometric design features and emergency access are also summarized in Section IV.I, Transportation, of this Draft EIR.*