

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, implementation of the Project would result in significant Project-level impacts that cannot be feasibly mitigated with respect to: historical resources; on-site construction noise; off-site construction noise; on-site construction vibration (building damage and human annoyance); and off-site construction vibration (human annoyance). Implementation of the Project would also result in significant cumulative impacts that cannot be feasibly mitigated with regard to: on-site construction noise; off-site construction noise; and off-site construction vibration (human annoyance).

a. Historical Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, implementation of Mitigation Measure CUL-MM-1 (temporary removal, storage, and reinstallation of the historic pavers immediately adjacent to the Project Site to allow for the installation of a shoring system to mitigate vibration impacts to the resource) would reduce the Project's impact to the designated historical resource to the extent feasible while maintaining its historic integrity. However, as discussed in Section IV.H, Noise, of this Draft EIR, while construction logistics have been designed to work around the resource to the extent feasible, on-site construction vibration would exceed the significance criterion for the historic resource and no additional feasible mitigation has been identified. As discussed therein, in order for vibration levels to be reduced to a less than significant level, a 20-foot setback from the historic resource would be required. This is infeasible because construction would involve work up to the property line. Other mitigation measures considered to reduce vibration

impacts 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 groundborne vibration from the excavation equipment. The temporary removal, storage, and reconstruction of the entire resource, not just the pavers immediately adjacent to the Project Site to allow for the installation of a shoring system, was also considered. This was determined to be infeasible because: (1) it is unknown how many of the pavers would remain intact and removal of the entire resource could result in a substantial adverse change to the extent that its integrity as a historic resource may be impaired; (2) the subsurface conditions under the pavers are not known and as a result, secondary impacts may result as a result of additional construction that may be needed in order to bring the street up to modern standards; (3) this process would require the long-term closure of Bruno Street, which would disrupt adjacent businesses, pedestrian and bicycle access, and vehicle traffic, including emergency vehicle access; and (4) the additional time required to complete this process would extend construction considerably, thus extending the amount of time the surrounding community is exposed to the Project's construction impacts. Therefore, impacts with respect to historical resources would remain significant and unavoidable.

b. On-Site Construction Noise

As evaluated in Section IV.H, Noise, of this Draft EIR, implementation of Mitigation Measure NOI-MM-1 (installation of temporary sound barrier) 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 12 A-weighted decibels (dBA) at the potential future residential uses along the north side of College Street (receptor location R3), which would reduce the impacts to a less than significant level at the ground level.¹ A 12 dBA noise reduction provided by Mitigation Measure NOI-MM-1 is a substantial reduction. However, the estimated construction-related noise levels would still exceed the significance thresholds at the upper levels of receptor location R3 (levels 2 through 7) with the implementation of Mitigation Measure NOI-MM-1. There are no other feasible mitigation measures that could be implemented to reduce the temporary noise impacts from on-site construction at the upper levels of receptor location R3. Therefore, Project-level construction noise impacts associated with on-site noise sources would be significant and unavoidable. Cumulative on-site construction noise impacts would also be significant and unavoidable at receptor locations R2 and R3 in the event that construction activities associated with the Project and

¹ Receptor location R3 is also Related Project No. 5.

the Related Project No. 5 (potential impacts at receptor location R2) and with the Related Project No. 21 (potential impacts at receptor location R3) were to occur concurrently. Therefore, Project-level and cumulative on-site construction noise impacts would remain significant and unavoidable because this impact cannot be mitigated at the upper levels of receptor location R3. However, the cumulative noise impacts at receptor location R3 would only occur if the mixed-use development is constructed and occupied during the construction of the Project and the Related Project No. 21.

c. Off-Site Construction Noise

As evaluated in Section IV.H, Noise, of this Draft EIR, noise impacts from off-site construction trucks were determined to be significant without mitigation. However, 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 off-site construction truck traffic noise impacts, would not be practical as the barriers would obstruct the access and visibility to the properties along the anticipated haul routes. Additionally, if the proposed residential development (Related Project No. 5) is completed and occupied prior to or during Project construction, cumulative noise impacts associated with off-site construction trucks from the Project and other related projects would be significant along West College Street (between Alameda Street and Main Street). Therefore, Project-level and cumulative off-site construction noise impacts would be significant and unavoidable.

d. On-Site Construction Vibration (Building Damage)

As discussed above and in Section IV.B, Cultural Resources, of this Draft EIR, implementation of Mitigation Measure CUL-MM-1 (temporary removal, storage, and reinstallation of the historic pavers immediately adjacent to the Project Site to allow for the installation of a shoring system to mitigate vibration impacts to the resource) would reduce the Project's impact to this designated historical resource to the extent feasible while maintaining its historic integrity. However, while construction logistics have been designed to work around the resource to the extent feasible, in order for vibration levels to be reduced to a less than significant level, a 20-foot setback from the historic resource would be required. This is infeasible because construction would involve work up to the property line. Other mitigation measures considered to reduce vibration impacts 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 groundborne vibration from the excavation equipment. The temporary removal, storage, and reconstruction of the entire resource, not just the pavers immediately adjacent to the Project

Site to allow for the installation of a shoring system, was also considered. This was determined to be infeasible because: (1) it is unknown how many of the pavers would remain intact and removal of the entire resource could result in a substantial adverse change to the extent that its integrity as a historic resource may be impaired; (2) the subsurface conditions under the pavers are not known and as a result, secondary impacts may result as a result of additional construction that may be needed in order to bring the street up to modern standards; (3) this process would require the long-term closure of Bruno Street, which would disrupt adjacent businesses, pedestrian and bicycle access, and vehicle traffic, including emergency vehicle access; and (4) the additional time required to complete this process would extend construction considerably, thus extending the amount of time the surrounding community is exposed to the Project's construction impacts. Therefore, impacts with respect to on-site vibration pursuant to the threshold for building damage would remain significant and unavoidable.

e. On-Site Construction Vibration (Human Annoyance)

As evaluated in Section IV.H, Noise, of this Draft EIR, the estimated vibration levels from on-site construction equipment would exceed the human annoyance significance criteria of 72 vibration decibels (VdB) at the off-site receptor location R3. Mitigation measures considered to reduce vibration impacts from on-site and off-site construction 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 are not feasible as they 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. Therefore, Project-level on-site construction vibration (human annoyance) impacts would remain significant and unavoidable. The nearest related project to receptor location R3 is Related Project No. 21, which is located adjacent to receptor location R3. Therefore, to the extent that Related Project No. 21 would contribute to the potential cumulative vibration impacts with respect to human annoyance associated with on-site construction, the cumulative impact would also be significant and unavoidable because no feasible mitigation was identified.

f. Off-Site Construction Vibration (Human Annoyance)

As evaluated in Section IV.H, Noise, of this Draft EIR, vibration impacts from off-site construction activities would be significant with respect to the significance criteria for human annoyance along the roadway segment of College Street. There are no feasible mitigation measures that could be implemented to reduce the Project's off-site construction vibration (human annoyance) impacts to a less-than-significant level since it would not be feasible to install a wave barrier along the public roadways to mitigate these impacts. Therefore,

Project-level off-site construction vibration (human annoyance) impacts would remain significant and unavoidable. Cumulative impacts would also be significant and unavoidable as it is anticipated that Related Project No. 21 would use the same construction haul route (i.e., College Street) as the Project, and the installation of a wave barrier along the public roadways would similarly be infeasible. Therefore, Project-level and cumulative off-site construction vibration impact related to human annoyance would be significant and unavoidable.

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

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

As discussed in Section II, Project Description, of this Draft EIR, the underlying purpose of the Project is to provide an infill commercial development to support the growing retail, hospitality, entertainment, and technology companies looking to locate businesses within Downtown Los Angeles. The underlying 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 Southern California Association of Governments' (SCAG) 2024–2050 Regional Transportation Plan/Sustainability Communities Strategy Connect SoCal (2024–2050 RTP/SCS) and the City's General Plan.

The Project's general consistency with the applicable goals set forth in the 2024–2050 RTP/SCS is analyzed in Table 1 of Appendix G of this Draft EIR. As detailed therein, the Project would be generally consistent with the applicable goals set forth in the 2024–2050 RTP/SCS adopted for the purpose of avoiding or mitigating environmental effects. Specifically, the Project would support the goals of the 2024–2050 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 on 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 served by a variety of nearby mass transit options, including the Metro A Line Chinatown Station, located approximately 0.15 miles north of the Project Site, and multiple bus lines. The Project would also enhance the pedestrian environment along the perimeter of the Project Site to promote walking, provide 149 bicycle parking spaces as well as lockers

and showers for the proposed uses that would serve to promote the use of bicycles, and also provide charging stations to serve electric vehicles. 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 and walking and biking, and thereby improve the environment and health of nearby residents by supporting low and zero emission modes of transportation.

The Project would support the Central City North Community Plan's objective to conserve and strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services by developing new office, restaurant, and retail uses in Downtown Los Angeles. As noted above, 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 greenhouse gas emission goals. The Project would also support the Central City North Community Plan's policy to locate new commercial uses in existing established commercial areas because the Project Site is located within proximity to industrial and commercial locations.

Additionally, the Project would improve the pedestrian experience and function, design, and economic vitality of the Community Plan area through the introduction of new ground floor retail and restaurant uses which would help to activate the Project Site and surrounding area. Further, as noted above, the Project would enhance the pedestrian experience by providing new landscaping along North Alameda Street, West College Street, North Main Street, and Bruno Street. These perimeter areas would include landscaping such as street trees and shrubs. In addition, the Project would include a landscaped amenity terrace on the second and fourth levels of the office building, which would create a building break, create a connection between the office levels above the podium, and provide pedestrian circulation, as well as ample open space for use by employees.

In addition, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce and conserve energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features would include, but would not be limited to: photovoltaic cells; electric vehicle parking; a transportation demand management program; material recycling stations; highly efficient HVAC systems; energy-efficient wall insulation and glazing units; WaterSense-labeled plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star-labeled appliances; and water-efficient landscape design.

The Project would also support the City's objective to establish a balance of land uses through the development of an infill commercial project with office, restaurant, and retail uses

in an area well-served by public transit. The proposed office, restaurant, and retail uses would complement the employment base (e.g., existing residential, commercial, office, hotels, and entertainment venues) of the Central City North Community Plan area, provide amenities to meet the needs of local residents, and serve to reduce VMT by locating jobs in an area well served by public transit.

Based on the above, the Project reflects a development that is consistent with the overall vision of the City and SCAG to locate supporting and harmonious uses within an infill 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. Therefore, the benefits of the Project outlined above would outweigh the Project significant and unavoidable noise and vibration impacts (most of which are common to infill projects in the City). 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 natural resources or 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). However, this resource consumption would be consistent with growth anticipated for the City and Southern California region as a whole. Further, use of such resources would be of a relatively small scale in relation to the Project's fulfillment of regional and local urban design and development goals for the area. These goals are intended to promote smart growth that would reduce resource consumption by reducing vehicle trips and incorporating sustainable design features. As such, the use of such resources would not be significant.

The Project's potential impacts related to solid waste are addressed in the Initial Study prepared for the Project, which is included as Appendix A of this Draft EIR. As discussed therein, during construction of the Project, a minimum of 75 percent of construction and demolition debris would be diverted from landfills. In addition, during operation, the Project would provide on-site recycling containers within a designated recycling area for Project occupants to facilitate recycling in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687) and the Los Angeles Green Building Code. In accordance with Assembly Bill (AB) 1826, the Project would also provide for the recycling of organic waste. The Project would adhere to State and local solid waste policies and objectives that further goals to divert waste. Thus, the consumption of non-renewable building materials (aggregate, plastics, etc.) 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 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) and LADWP would be able to meet the water demand of the Project, as well as the existing and planned future water demands of its service area. In addition, the Project would implement a variety of sustainable features related to water conservation to reduce indoor water use, as set forth in Section II, Project Description, and Section IV.K.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. 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, adequate water supplies are available to serve the Project, and the Project would not result in a significant impact related to water supply.

c. Energy Consumption

During Project construction fossil fuels, such as diesel, gasoline, and oil, would be consumed for construction vehicles and equipment and during operation, non-renewable fossil fuels would represent the primary energy source. Thus, the existing finite supplies of these resources would be incrementally reduced during construction and operation. 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 52,271 gallons of gasoline and approximately 187,330 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.001 percent of the 2027 (start year of Project construction) annual on-road gasoline-related energy consumption and 0.03 percent of the 2027 annual diesel fuel-related energy consumption in Los Angeles County². Furthermore, as detailed in Section IV.C, Energy, of this Draft EIR, a total of approximately 20,239 kWh of electricity is anticipated to be consumed during Project construction which would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. In addition, trucks and equipment used during construction activities would comply with 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 fuel efficiency requirements. Therefore, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources, and Project energy impacts during construction would be less than significant.

During operation, the Project's increase in electricity and natural gas demand would be within the anticipated service capabilities of LADWP and the Southern California Gas Company (SoCalGas), respectively. Specifically, the Project's electricity and natural gas demand would represent approximately 0.02 percent of both LADWP projected sales and SoCalGas' projected consumption in 2028, the Project's buildout year. In addition, as discussed in Section IV.C, Energy, of this Draft EIR, the Project would comply with the applicable Title 24 standards and CALGreen requirements. Gasoline and diesel fuel

² Refer to Appendix D of this Draft EIR for detailed energy calculations.

consumption during operation are estimated to be 221,035 gallons and 41,094 gallons, respectively, which would account for 0.006 percent of gasoline and diesel fuel consumption, respectively, in Los Angeles County. In addition, the Project includes a number of features that would reduce the number of VMT such as increased density, increased destination and transit accessibility, and a transportation demand management (TDM) program to reduce vehicle trips and associated VMT.

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, as discussed in Section IV.C, Energy, of this Draft EIR, Project operations would not conflict with adopted energy conservation plans. Specific energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2022 CALGreen Code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City's Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency.

Refer to Section IV.C, Energy, of this Draft EIR, for a detailed analysis regarding the Project's consumption of energy resources.

d. Environmental Hazards

The Project's potential use and transportation of hazardous materials is addressed in Section IV.F, Hazards and Hazardous Materials, 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 office and commercial developments. Specifically, construction of the Project would involve the temporary use of potentially hazardous materials, including fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners. Lead contaminated soil that exceeds the Soluble Threshold Limit Concentration (STLC) and elevated levels of tetrachloroethylene (PCE) and trichloroethylene (TCE) that exceed the Department of Toxic Substances Control screening levels was identified on the Project Site. Mitigation Measures HAZ-MM-1 (Soil Management Plan), HAZ-MM-2 (Combined Methane/Vapor Intrusion Mitigation System), and HAZ-MM-3 (Post-Construction Monitoring) have been included and would reduce impacts to a less-than-significant level. 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 products, paints, and those used for maintenance of landscaping. However, all potentially hazardous materials used during construction and operation would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be reduced to a less than significant level through compliance with these standards and regulations. As such, compliance with regulations and standards would serve to protect against significant and

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

e. Conclusion

Based on the above, Project construction and operation would require the irreversible commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources and the Project Site for future generations or for other uses. However, the consumption of such resources would not be significant 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: (1) such changes would be less than significant; and (2) 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.

a. Population

As discussed in Section II, Project Description, of this Draft EIR, the Project would include the construction of new office, restaurant, and retail uses. As indicated in Section XIV(a) of the Initial Study included as Appendix A of this Draft EIR, since the Project does not propose housing, 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. Additionally, while construction of the Project would create temporary

construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project. Furthermore, while Project operation would generate 930³ new permanent jobs, and while some of these jobs could be filled by persons who relocate to Project vicinity, this potential increase in population would not be substantial since not all employees would move close to the Project Site (i.e., some jobs may be filled by people already residing in the vicinity of the Project Site and other persons would commute to the Project Site from other communities in and outside of the City).

b. Employment

As indicated in the Initial Study included as Appendix A of this Draft EIR, while construction of the Project would create temporary construction-related jobs, 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 and, as noted above, construction workers are not expected to relocate as a result of the Project.

Based on employment generation rates published by the Los Angeles Department of Transportation and the Los Angeles Department of City Planning, the Project would generate 930 new employees on the Project Site.⁴ Using employment data from the 2024–2050 RTP/SCS, an estimated 2,047,263 employees are projected within the City of Los Angeles in 2028, the Project's buildout year, with 41,450 new employees between 2024 and 2028. The Project's increase in employees would represent 0.05 percent of the total number of employees in 2028 and 2.24 percent of the growth between 2024 and 2028. The Project would not introduce new homes at the Project Site and would therefore not result in direct population growth in the area and the number of jobs would be consistent with SCAG's 2024–2025 RTP/SCS. While some of the new jobs could be filled by persons who would relocate to the vicinity of the Project Site, this potential increase in population would not be substantial since not all employees would move close to the Project Site. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project Site and other persons would commute to the Project Site from other communities in and outside of the City. Given that some Project employment opportunities would be filled by people already

³ Gibson Transportation Consulting, Inc., *Transportation Assessment for the 130 College Street Project*, October 2024. Included as Appendix I of this Draft EIR.

⁴ Gibson Transportation Consulting, Inc., *Transportation Assessment for the 130 College Street Project*, October 2024. Included as Appendix I of this Draft EIR.

residing in the vicinity of the Project Site or who would commute to the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial.

c. Infrastructure Improvements

The area surrounding the Project Site is already fully developed with a mix of residential, commercial, and industrial uses, and already contains fully developed roadway and utility infrastructure systems. Project roadway improvements would be limited to driveways necessary to provide immediate access to the Project Site, sidewalk and streetscape improvements, and improvements required to comply with Americans with Disabilities Act (ADA) requirements. Project utility improvements would be limited to connections to the existing water, sewer, and natural gas mains and electrical transmission lines along the adjacent streets, new fire hydrants, and connections to on-site water, electricity and natural gas distribution and wastewater collection lines. The Project would not require the extension of roads or utility infrastructure in a manner that would indirectly induce substantial population growth.

d. Conclusion

The Project would be consistent with the growth forecast for the City of Los Angeles and with policies in the City's General Plan and SCAG's RTP/SCS to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of VMT. Furthermore, the Project would not extend roadway or utility infrastructure to undeveloped areas, reduce impediments to urban growth, or open undeveloped areas to urban growth. Therefore, Project 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. Cultural Resources

Mitigation Measure CUL-MM-1 requires that, prior to the issuance of grading permits, the Applicant shall prepare a demolition and shoring plan to ensure the proper protection and treatment of the Granite Paving Block (HCM No. 211) during construction. The demolition and shoring plan shall be prepared by a qualified structural engineer with input from the Project geotechnical engineer and a qualified preservation consultant and shall include appropriate measures to protect the adjacent Granite Paving Block (HCM No. 211) from damage due to demolition, excavation or other ground-disturbing activities, vibration, soil settlement, and general construction activities. The demolition and shoring plan shall be submitted to the City for review and approval by the City of Los Angeles' Office of Historic Resources (OHR). This mitigation measure represents procedural actions and would be beneficial in protecting historical resources near the Project Site because the portion of Granite Block Paving (HCM No. 211) immediately adjacent to the Project Site would be protected from construction activities. As such, implementation of this mitigation measure would not result in significant adverse secondary impacts.

b. Geology and Soils

Mitigation Measure GEO-MM-1 requires that, prior to the to Project construction, the Applicant shall retain a Qualified Paleontologist and conduct worker training. The Qualified Paleontologist shall monitor for paleontological resources during ground-disturbing activities and prepare a paleontological resource monitoring report. A copy of the final monitoring report shall be filed with the Los Angeles Department of City Planning. This mitigation measure represents procedural actions and would be beneficial in protecting paleontological resources near the Project Site because any previously unidentified paleontological resources would be protected from construction activities. As such, implementation of this mitigation measure would not result in significant adverse secondary impacts.

c. Hazards and Hazardous Materials

Mitigation Measure HAZ-MM-1 requires that the Applicant retain a qualified environmental consultant to prepare a Soil Management Plan for Contaminated Soils (SMP) which must be submitted to the City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities. The SMP shall be implemented during grading, excavation, and installation of piles and tiebacks on the Project Site to ensure that contaminated soils are properly identified, excavated, and disposed of off-site. Elements of the SMP shall include: (1) monitoring of Project grading and excavation activities for evidence of contamination; (2) implementation of the SMP that requires timely testing/sampling of soils, separation of any VOC-contaminated soils for proper disposal, and testing parameters and sampling frequency; (3) the parameters for the soil monitoring; (4) the treatment, removal and disposal of contaminated soils per applicable

regulations; (5) implementation of active dust suppression of stockpiles known or suspected to contain contaminants; and (6) reporting of the results of the Phase II Subsurface investigation to the County's Health Hazardous Materials Division Site Mitigation Unit and Los Angeles Fire Department (LAFD) for review/ comment prior to grading and excavation. This mitigation measure represents procedural actions and would be beneficial in protecting the public and the environment from contaminated soil and associated health/environmental effects because impacted soil would be removed from the Project Site in a manner to protect public health. As such, implementation of this mitigation measure would not result in significant adverse secondary impacts.

Mitigation Measure HAZ-MM-2 requires the installation of a passive vapor barrier to prevent vapor intrusion. The passive system shall include at a minimum a standard de-watering system or reinforced concrete mat slab designed to accommodate hydrostatic pressure and a complete impervious membrane (barrier) system comprising a minimum of 60 mils of high-density polyethylene film, and layers of specially formulated synthetic adhesive layers, or equivalent. The passive system would be included as part of Project construction and, as such, any impacts associated with its installation are already analyzed throughout this Draft EIR. As such, implementation of this mitigation measure would not result in significant adverse secondary impacts.

Mitigation Measure HAZ-MM-3 requires vapor screening to confirm the passive vapor barrier installed per Mitigation Measure HAZ-MM-2 is working. In the event contaminant levels still exceed current thresholds, engineering controls including one or more of the following actions shall be implemented: (1) Increasing ventilation rates in the subterranean parking and ground floor space; (2) Treating the interior air with inline carbon filters with the HVAC system; (3) Repairing any gaps or cracks around concrete penetrations; or (4) Converting the passive system to an active mitigation system. All of these engineering controls consist of adjustments to the vapor barrier already installed. As such, implementation of this mitigation measure would not result in significant adverse secondary impacts.

d. Noise

Mitigation Measure NOI-MM-1 requires that temporary and impermeable sound barriers be erected along the Project's northern property line between the construction areas and the potential future residential uses along the north side of College Street (receptor location R3). The temporary sound barrier shall be designed to provide a minimum 12-dBA noise reduction at the ground level of receptor R3 (noise impacts at upper levels 2 to 7 would not be mitigated to a less than significant level, as discussed above). The mitigation further requires that building plans include documentation prepared by a noise consultant verifying compliance with this measure. 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 barrier would be removed. As such, implementation of this mitigation measure would not result in significance adverse long term secondary impacts.

e. Transportation

Mitigation Measure TR-MM-1 requires implementation of a ride-share program to reduce single occupancy vehicle trips and the provision of designated parking areas for carpools/vanpools. This mitigation measure represents procedural actions to reduce VMT because these provisions would reduce single occupancy vehicle trips. As such, implementation of this mitigation measure would not result in significant adverse secondary impacts

f. Tribal Cultural Resources

Mitigation Measures TCR-MM-1 through TCR-MM-4 require, prior to ground disturbing activities, the Applicant to retain archeological monitors and tribal monitors that are qualified to identify subsurface tribal cultural resources and provide Worker Environmental Awareness Program (WEAP) training. In the event that any subsurface objects or artifacts that may be tribal cultural resources are encountered during the course of any ground-disturbance activities, all such activities shall temporarily cease within the area of the discovery, the radius of which shall be 60 feet or otherwise determined by the archeological monitor, until the potential tribal cultural resources are properly assessed and addressed pursuant to the requirements of the mitigation measures. These mitigation measures also specify that if human remains are discovered, PRC Sections 5097.9 et seq. as well as Health and Safety Code Section 7050.5 shall be followed. These mitigation measures represent procedural actions and would be beneficial in protecting tribal cultural resources near the Project Site. As such, implementation of these mitigation measure would not result in significant 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 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)⁵
- Biological Resources
- Cultural Resources (human remains)⁶
- Geology and Soils (geologic hazards)⁷
- Hazards and Hazardous Materials (routine transport, use, or disposal; airport hazards; emergency response plan; and wildfire)⁸
- Hydrology and Water Quality
- Land Use and Planning (division of an established community)⁹
- Mineral Resources
- Noise (airport and airstrip noise)¹⁰
- Population and Housing
- Public Services (i.e., fire, police, schools, parks, libraries)
- Recreation
- Transportation (hazardous geometric design features, emergency access)¹¹

⁵ Impacts related to odors are also summarized in Section IV.A, Air Quality, of this Draft EIR.

⁶ Impacts related to human remains are also summarized in Section IV.B, Cultural Resources, of this Draft EIR.

⁷ Impacts related to geologic hazards are also summarized in Section IV.D, Geology and Soils—Paleo, of this Draft EIR.

⁸ Impacts related to routine transport, use, or disposal; airport hazards; emergency response plans; and wildfire are also summarized in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR.

⁹ Impacts related to the physical division of an established community are also summarized in Section IV.G, Land Use, of this Draft EIR.

¹⁰ Impacts related to airport and airstrip noise are also summarized in Section IV.H, Noise, of this Draft EIR.

¹¹ Impacts related to hazardous geometric design features and emergency access are also summarized in Section IV.I, Transportation, of this Draft EIR.

- Utilities and Service Systems (wastewater, stormwater, telecommunications, solid waste)
- Wildfire