VI. Other CEQA Considerations

VI. Other CEQA Considerations

1. Significant Unavoidable Impacts

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts which cannot be avoided. Specifically, 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 and unavoidable impacts that cannot be feasibly mitigated with respect to direct Project and cumulative impacts on historic resources. All other impacts associated with the Project would be less than significant or reduced with mitigation to less than significant.

a. Direct Impacts to Historic Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, seven parcels on the Project Site along South Flower Drive are located within the boundaries of the Flower Drive Historic District. The Project would include the demolition of six buildings that are contributing resources within the boundaries of the Flower Drive Historic District. Specifically, seven buildings on the Project Site are contained within the northern portion of the Flower Drive Historic District and would be demolished as part of the proposed Project. Six of the buildings proposed for demolition are contributing buildings and one is a non-contributing building (see Figure IV.B-2, Contributing and Non-contributing Resources Within the Flower Drive Historic District, in Section IV.B, Cultural Resources, of the Draft EIR).

The contributing resources within the Flower Drive Historic District proposed to be demolished are considered historical resources in and of themselves and contain character defining features that make the Flower Drive Historic District eligible for listing. Therefore, the direct impact caused by the Project would be significant, regardless of whether the remaining contributors remain eligible for listing. Therefore, the Project would cause a potentially significant direct impact to the Flower Drive Historic District.

By demolishing six contributing resources, the Project would materially impair the physical characteristics of key character-defining features of the Flower Drive Historic District that convey its historical significance and justify its eligibility for listing in the California Register; therefore, the Project would result in a direct significant impact to the Flower Drive Historic District that cannot be mitigated.

Mitigation Measures CUL-MM-1 and CUL-MM-2 reduce impacts, but do not reduce the impacts to a less than significant level. CUL-MM-1 would require the installation of an Interpretive Display that would include a brief history of the area as well as the district and its significance within the context of multi-family residential housing development located visible from the public right-of-way along South Flower Drive between West 38th Street and West 39th Street. CUL-MM-2 would require the preparation of a California Register historic district nomination for the contributing buildings remaining after construction of the Project. However, due to the unique nature of the historic contributor buildings proposed for demolition by the Project, the implementation of Mitigation Measures CUL-MM-1 and CUL-MM-2 would not reduce direct impacts to the Flower Drive Historic District to a less than significant level. Due to the unique nature of the historic contributor buildings proposed for demolition by the Project, the implementation of Mitigation Measures CUL-MM-1 and CUL-MM-2 would not reduce direct impacts to the Flower Historic District to less than significant. Therefore, direct impacts would remain significant and unavoidable. Further, under CEQA's "material impairment" standard, there is no feasible mitigation that can reduce the significant impact to a less than significant level. **Therefore, impacts would remain significant and unavoidable.**

b. Cumulative Impacts to Historical Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are a total of seven related development projects (Related Projects) that have been identified in the general vicinity of the Project Site.[1] The four Related Projects located within 1,000 feet of the proposed Project include Related Project 1 (California African American Museum, located approximately 230 feet northwest of the Project Site), Related Project 6 (3900 South Figueroa Street (The Fig Project), located approximately 350 feet to the south of the Project Site), Related Project 7 (3851 Grand Avenue, located approximately 440 southeast of the Project Site), and Related Project 5 (3801 South Grand Avenue, located approximately 488 feet to the east of the Project Site).

Cumulative impacts would occur if the Project and related projects cumulatively affect historical resources in the immediate vicinity, contribute to changes within the same historic district, or involve resources that are examples of the same property type as those within the Project Site. Section IV.B, Cultural Resources, of this Draft EIR considered four related projects identified by the City for potential cumulative impacts. Of the seven Related Projects, the four located within 1,000 feet of the Project Site were considered in the cumulative impacts analysis.

- **Related Project No.1 California African American Museum Renovation Project**

  The CAAM Renovation Project was identified as a related project within the Historic Resources Technical Report. It consists of a renovation and expansion of the existing museum. The lead agency for CEQA, the California Science Center, determined that the CAAM Renovation Project would not result in significant impacts to the environment. A mitigated negative declaration (MND) was prepared and the notice of determination (NOD) was filed in January 2010, which determined that the renovation project would not negatively impact the resource's eligibility for listing as a historical resource. Therefore, the Project in combination with Related Project No. 1 would not have

[1] Related in terms of geographic area and/or potential impact, not by project type, proponent, or other similarities.

the potential to result in a cumulatively considerable impact to the historic setting of any historical resources and cumulative impacts would be less than significant.

- **Related Project No.6 3900 South Figueroa Street Mixed-Use (The Fig Project)**

  The Fig Project was identified as a cumulative project within the Flower Drive Historic District boundary in the Historic Resources Technical Report. The Fig Project originally consisted of demolishing eight existing multi-family residential buildings and constructing a new mixed-use building. The lead agency for CEQA was the City. In the EIR certified by City Council in June 2019, the City determined that the Fig Project would result in a significant direct impact on historical resources, and that even with implementation of mitigation measures, impacts would remain significant and unavoidable.

  As a result of legal proceedings occurring after certification of the EIR, the Fig Project was revised to include the following:

  - Reduction in the number of demolished buildings within the Flower Drive Historic District from eight to three;
  - Retention of two contributing resources that were previously proposed for demolition;
  - Relocation of one contributing resource to a new location within the Flower Drive Historic District boundaries;
  - Relocation of two contributing resources to a new location outside the Flower Drive Historic District boundaries; and
  - Decrease in the new construction's total floor area.

Taken together, the Project and the Fig Project would result in the loss of ten buildings within the district (eight contributing, two non-contributing). Three buildings would be moved from their original locations, including one relocation within the district boundaries and two outside the district boundaries to the immediate south of the historical district boundary along South Flower Drive. Thus, a total of nine contributors would remain on South Flower Drive with the Project and Fig Project, collectively, including seven contiguous buildings – four north of West 39th Street and three south of West 39th Street – within the district, and two located to the immediate south of the district on South Flower Drive, north of Martin Luther King, Jr. Boulevard.

The separate direct impacts to the Flower Drive Historic District caused by the Project and the Fig Project would be increased when considered together. The combined impacts would result in a more drastic change to the integrity of setting and feeling within the District, and would further reduce the number of extant contributing resources; therefore, the cumulative impact to the Flower Drive Historic District from the Fig Project and the Project would be significant.

- **Related Project No.7 3851 South Grand Avenue Mixed-Use Project**

  The 3851 South Grand Avenue Mixed-Use Project was identified as a Related Project in the vicinity of the Project Site, although it is located outside of the Impact Area

defined in the Historic Resources Technical Report. It consists of the construction of a new mixed-use building on two contiguous vacant lots east of the I-110 Freeway.

The Letter of Determination issued by the Department of City Planning on December 11, 2023 indicates that the City determined that the 3851 South Grand Avenue Mixed-Use Project would not result in a substantial adverse change to historical resources; therefore, there is no potential for significant cumulative impacts to historical resources.[2] In addition, the Related Project is located on the opposite side of I-110 Freeway and is thus physically and visually separated from the Project Site by the freeway, and there are no shared or common resources between the two projects.

- **Related Project No.5 3801 South Grand Avenue Mixed-Use Project**

The 3801 South Grand Avenue Mixed-Use Project was identified as a Related Project in the vicinity of the Project Site, although it is located outside of the Impact Area defined in the Historic Resources Technical Report. It consists of the construction of a new mixed-use building on a vacant lot east of I-110 Freeway.

The Letter of Determination issued by the Department of City Planning on August 23, 2023 indicates that the City determined the 3801 South Grand Avenue Mixed-Use Project would not result in a substantial adverse change to historical resources; therefore, there is no potential for significant cumulative impacts to historical resources. [3] In addition, the Related Project is located on the opposite side of I-110 Freeway and is thus physically and visually separated from the Project Site by the freeway, and there are no shared or common resources between the two projects.

As noted above, the Project and the Fig Project would result in the demolition of a total of ten buildings within the existing Flower Drive Historic District, including eight contributors. With the two projects in place, there would be four contributors remaining in their existing configuration on the 3800 block of South Flower Drive (north of West 39th Street), and there would be three contributors on the 3900 block of South Flower Drive (south of West 39th Street), including two contributors in their existing configuration and one relocated contributor. Further, two contributors would be moved to a location outside the existing district boundary to the south, near the intersection of South Flower Drive and West Martin Luther King Jr. Boulevard. Thus, a total of nine current contributors (seven contiguous and two immediately outside the existing district boundary) would remain on South Flower Drive out of 17 original contributing buildings (or 19 total buildings).

When the District was determined eligible for listing in the California Register in 2008, the staff evaluation noted the following:

> *…The Flower Drive Historic District exhibits a strong sense of historical and architectural cohesion. While each individual residence within the district's*

[2] City of Los Angeles Department of City Planning, "Case Number: DIR-2023-5190-TOC-HCA, Letter of Determination." https://planning.lacity.gov/pdiscaseinfo/document/MTE2MzQ0/fe3b456d-e5a5-4f0e-9fa7-879f1ff43502/pdd, December 11, 2023, accessed January 2026.

[3] City of Los Angeles Department of City Planning, "Case Number: DIR-2023-2487-TOC-HCA, Letter of Determination," https://planning.lacity.gov/pdiscaseinfo/document/ODAxOQ0/fe3b456d-e5a5-4f0e-9fa7-879f1ff43502/pdd, August 23, 2023, accessed January 2026.

boundaries may not be architecturally significant, together this grouping of similar properties, with consistent set-backs, two-story heights, similar spatial arrangements, architectural styling, and common street features gives the Flower Drive neighborhood its strong sense of time and place.[4]

The proposed Project and Fig Project would not result in the wholesale loss of all contributing buildings to the Flower Drive Historic District or features that made the district eligible for the California Register listing in 2008. The buildings proposed to remain would be considered contributing resources, and each contributor would retain its respective character-defining physical features, including Mediterranean Revival architectural styling and two-story height. The contiguous grouping would retain the existing interrelationship between each multi-family building, the respective detached garages, and the street. Common street features that unify the buildings, including front yards, consistent setbacks, concrete sidewalks, driveways, and retaining walls would also remain fully or otherwise largely intact for the remaining buildings. The physical features and spatial relationships that made the district eligible would be retained, albeit with a smaller number of contributors, but the eligibility standards in the LACHCS do not identify a minimum number of contributors needed to constitute a potential historic district.

For the reasons discussed above, there is a possibility that the remaining grouping of contributors would have the potential for continued eligibility for California Register listing under Criteria 1 and 3 under the Multi-Family Residential Historic District eligibility standards in the LACHCS. However, the potential Project-level and cumulative impact regarding continued eligibility for the remainder of the district would not be reduced to a less than significant level.

Though the Project would implement Mitigation Measures CUL-MM-1 and CUL-MM-2**,** because of the unique and irreplaceable nature of the historic contributor buildings proposed for demolition by the Project, the implementation of these mitigation measures would not reduce cumulative impacts on the historical resource to a less than significant level. **Accordingly, the Project's impacts on the Flower Drive Historic District would be cumulatively considerable, and cumulative impacts to historic resources would remain 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 develop an infill mixed-use project that maximizes the available residential density with a mix of market-rate and affordable multi-family housing near existing community resources, such as public transit facilities, as well as institutional anchors in sports, entertainment, and

[4] Toffelmier, Cynthia. "Flower Drive Historic District, Los Angeles, Los Angeles County, Staff Evaluation." October 23, 2008. On file at South Central Coastal Information Center.

academia. The Project would also promote local and regional economic growth by developing new commercial uses that provide short- and long-term employment opportunities and sales tax revenue in the City.

The underlying purpose and objectives of the Project are closely tied to the goals and objectives of the South Los Angeles Community Plan and the Los Angeles Exposition/University Park Redevelopment Plan, which support the objectives and policies of applicable larger-scale regional and local land use plans, including the City's General Plan, including the Framework Element, Mobility Plan 2035, Conservation Element, Housing Element, and Health and Wellness Element (Plan for a Healthy Los Angeles), Citywide Design Guidelines and the Southern California Association of Government's (SCAG's) 2024–2050 Regional Transportation Plan/ Sustainability Communities Strategy Connect SoCal (2024–2050 RTP/SCS).

The Project would support and would be consistent with General Plan Framework as it would contribute to the needs of the City's existing and future residents, businesses, and visitors by constructing a mixed-use development near transit facilities (including Los Angeles County Metropolitan Transportation Authority [Metro] and Los Angeles Department of Transportation [LADOT] bus lines and the Metro Rail Exposition Park/USC Station), and opportunities for walking and biking that would facilitate a reduction of vehicle miles traveled, while supporting the City's objective to encourage new multi-family residential and commercial development along primary transit corridors/boulevards. The Project Site is further identified as a transit priority area (TPA) by SCAG, and would also support the City's policies to provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods.

The Project would feature a similar mix of land uses as the existing uses surrounding the Project Site. Overall, the design and scale of the Project would be substantially compatible with the scale and character of the surrounding uses, especially the "Hub Los Angeles Coliseum" a private student housing development that includes ground floor retail, multi-family residential uses, and various residential amenities. Thus, the Project would be consistent with, and would contribute to, the diverse character of the surrounding area. The Project would also be generally consistent with the relevant goals, objectives, and policies outlined in the Housing Chapter of the Framework Element by contributing to a more sustainable neighborhood that has mixed-income housing, jobs, transit, entertainment, and institutional anchors by providing a variety of housing types (i.e., studios, one-, two-, three, and four-bedroom units) at a variety of income levels. The Project would develop 209 dwelling units including 16 units for Low-Income households, 22 units for Very Low-Income households and four units for Extremely Low-Income households. The Project would be consistent with the relevant objectives, goals, and policies outlined in the Open Space and Conservation Chapter of the Framework Element.

The Project would provide 23,127 square feet of open space to meet the requirements of the LAMC. The Project would incorporate accessible at-grade open space as well as indoor, outdoor, and private open space (such as courtyards, a pool, roof decks, recreation rooms, and private patios) for Project residents and guests on the second floor and seventh floor, as well as private open space throughout the building on all levels.

The Project would also be consistent with the relevant goals, objectives, and policies of the Economic Development Chapter of the Framework Element. The Project would support the City's objective to establish a balance of land uses through the development of residential and commercial uses in an area well-served by public transit. The Project would foster continued economic investment by providing new residential and commercial opportunities.

The Project would be consistent with the relevant objectives and policies that support the goals of the Infrastructure and Public Services Chapter of the Framework Element. The Project would be required to obtain a National Pollutant Discharge Elimination System (NPDES) Permit and Stormwater Pollution Prevention Plans (SWPPP) during Project construction which would contain and treat, as necessary, stormwater or construction watering. Additionally, the Project would be substantially consistent with the applicable regulations associated with solid waste disposal.

Regarding the General Plan Housing Element, the mixture of different unit types at varied affordability levels provided by the Project would provide housing for different income levels and household sizes and contribute to the range of housing choices in the City. Furthermore, the Project would provide these new units by redeveloping an urban infill site that is close to multiple transit options that serve the greater Los Angeles region. The Project would also support the City's policy to develop and implement environmentally sustainable urban design standards and pedestrian-centered improvements. The Project would include energy conservation, water conservation, a pedestrian- and bicycle-friendly site design, and waste reduction measures. Thus, the Project would support the above Los Angeles General Plan Housing Element goals and would assist the City in meeting its RHNA allocations by contributing to the overall supply of housing.

The Project would support the Health and Wellness Element's efforts to reduce vehicle use as the Project would be located in a TPA and would be surrounded by a variety of transit services that would reduce VMT. The Project would encourage alternative transportation choices by improving the pedestrian experience along South Figueroa Street and by providing 146 bicycle parking spaces on-site. The Project would encourage recreational activities within the Project Site by providing indoor, outdoor, and private open space and amenity areas including a pool, courtyards, roof decks, recreation rooms, and private patios for Project residents and guests. In addition, the Project would incorporate various sustainability features that meet CALGreen and Title 24 Building Standards Code. The Project would use energy-efficient heating, ventilation, a gray water system for irrigation, HVAC and ENERGY STAR® appliances, and low-flow plumbing fixtures.

The Project would also meet the applicable goals and policies outlined in the South Los Angeles Community Plan. Specifically, the Project would support the City's objectives to locate new housing near public services, reducing vehicle miles traveled. The Project would provide a mix of housing types, at different affordability levels to accommodate all persons regardless of income, age, or background, and would locate new commercial uses within an existing, established commercial area along the Figueroa Street Corridor. However, the Project would demolish six contributing resources of the Flower Drive Historic District. This would materially impair the physical characteristics of the Flower Drive Historic District that convey its historical significance and justify its eligibility for listing in the California Register. Thus, the Project would

be inconsistent with the objectives and policies of the Community Plan related to the preservation of historic resources. Nonetheless, the Project would be substantially compliant with the remainder of the goals and policies of the South Los Angeles Community Plan.

The Project would support the goals and objectives of the Exposition/University Park Redevelopment Plan as the Project would assist in revitalizing the area by providing for new commercial and market-rate and affordable housing along a mixed-use corridor. The Project would enhance the pedestrian environment with new landscaping, street trees, and new ground floor restaurant and retail uses. Floor-to-ceiling windows at the ground level would further activate the street and provide visual transparency into the Project. The Project Site is also within close proximity to several transit options that would provide visitors and residents easy access to jobs, services, and educational institutions and reduce dependency on the automobile use.

The Project has been designed to be compatible with the surrounding urban environment. However, implementation of the Project would demolish six contributing resources of the Flower Drive Historic District. This would materially impair the physical characteristics of the Flower Drive Historic District that convey its historical significance and justify its eligibility for listing in the California Register. Therefore, the Project would be inconsistent with the Redevelopment Plan's objective to preserve historic buildings. Nonetheless, the Project would be substantially consistent with remaining goals and objectives of the Redevelopment Plan that are applicable to the Project.

The Project would be consistent with the Citywide Design Guidelines. The Project would provide bicycle parking and public right-of-way improvements along the sidewalks surrounding the Project Site, and would provide pedestrian-friendly landscaping and site design such as pedestrian-accessible, ground floor restaurant and retail uses that would enhance the streetscape and separate pedestrian and vehicle entrances into the Project building. The Project would include a new driveway along South Flower Drive that would provide ingress and egress into the at-grade parking garage. The parking garage would be wrapped by restaurant, retail and residential uses, and would be completely encompassed within the building and fully screened from view on all sides. Thus, the parking garage and driveways would not be highly visible from surrounding areas, which would serve to enhance the pedestrian environment. In addition, the Project frontage along South Figueroa Street would activate the street level with the inclusion of ground floor restaurant and retail uses and floor-to-ceiling windows which would provide visual transparency into the Project Site. The Project would also support the goals of the 2024–2050 RTP/SCS. Specifically, the Project would maximize the productivity of the region’s transportation system, support new housing growth as well as protect the environment and health of the region’s residents through its location on an urban infill site in close proximity to mass transit options, thereby minimizing vehicle miles traveled and reducing air pollution.

More specifically, the Project would involve the construction of 209 multi-family units that would provide a range of housing typologies including studios, one-bedroom units, two-bedroom units, three-bedroom units, and four-bedroom units. The Project would also include a total of 42 covenanted affordable units, including 16 units for Low-Income households, 22 units for Very Low-Income households, and four units for Extremely Low-Income households, thereby furthering SCAG’s goal of encouraging housing development in areas with access to important resources and amenities to further fair housing access and equity.

The Project Site is served by various transit services. The Los Angeles County Metropolitan Transportation Authority (LA Metro) E (Expo) light rail line's Exposition Park/USC station is located approximately 0.3 miles northwest of the Project Site on Exposition Boulevard which provides service to Santa Monica and Downtown Los Angeles. LA Metro has multiple stops that travel along the Project Site frontages, including Line 2, 81, and 550 which travel north/west along South Figueroa Street. The Los Angeles Department of Transportation (LADOT) also serves the Project Site with the DASH Southeast and DASH King-East service routes. Access to nearby bus stops would be maintained with safe and convenient paths of travel from the Project Site. Accordingly, the Project would support first/last mile connections from public transit facilities surrounding the Project Site.

In addition, the Project would provide a total of 16 short-term bicycle spaces on South Figueroa Street and West 38th Street in bicycle racks that would be located in the public right-of-way, and 130 long-term bicycle spaces that would be located on the ground floor of the Project Site within the wrapped, at-grade parking garage, thereby encouraging the use of alternative modes of transportation available in the vicinity of the Project Site. The Project would also improve the public-facing pedestrian realm by including ground floor commercial uses along South Figueroa Street that would include floor-to-ceiling windows providing visual transparency into the Project Site. Full width sidewalks with tree wells are proposed along South Figueroa Street and West 38th Street. The Project would be designed to meet the state and City's strict efficiency standards, complying with sustainable practices included in the Title 24 standards, CALGreen Code, and City ordinances such as those requiring increased installation of EV charging stalls and stations, solar energy use, and water conservation features. These standards would reduce energy and water usage and waste and thereby, potentially reduce associated GHG emissions and help minimize the impact on natural resources and infrastructure.

Several alternatives to the Project were considered in Section V, Alternatives, of this Draft EIR. Although the No Project Alternative (Alternative 1) would avoid the Project's significant and unavoidable impacts, it would not achieve the Project's underlying purpose to maximize the available residential density on the site with a mix of market-rate and affordable multi-family residential units near existing public transit facilities and institutional facilities, or the associated Project objectives. Therefore, it is not considered a feasible development alternative. As discussed in detail in Section V, Alternatives, of this Draft EIR, the environmentally superior alternative, Alternative 2 (Historic Preservation Alternative), would similarly avoid the significant impacts to the Historic District by retaining the six contributing historic resources, demolishing the non-contributing resource and replacing it with a three-story building with five residential units, and developing a 21-story tower with 132 residential units and some ground-floor commercial along the Figueroa Street frontage. However, it would also not meet some of the Project's underlying objectives, including developing an infill mixed-use project that provides new multi-family affordable housing in a diverse mixed-use urban environment near multiple transit opportunities and institutional uses, to the same extent as the Project. Similarly, Alternative 2 would not meet the goals and objectives of the City's Housing Element or contribute to the City's RHNA numbers to the same degree as the Project.

In addition, due to the smaller commercial area, Alternative 2 would not provide commercial uses that provide short- and long-term employment opportunities and sales tax

revenue to the same degree as the Project. Therefore, Alternative 2 would fail to meet the Project's basic objectives to the same extent as the Project. As such, this would also not be considered a feasible alternative.

Alternative 3 (Partial Preservation Alternative) would involve the demolition of three multi-family residential buildings on the Project Site, of which two are contributing resources to the Flower Drive Historic District (3801 – 3815 South Flower Drive), while preserving four contiguous multi-family residential buildings that are contributing resources to the Flower Drive Historic District (3819 – 3833 South Flower Drive). Two new four- story buildings would be constructed, one within the boundaries of the Flower Drive Historic District at 3801 – 3815 South Flower Drive, and one immediately outside the Flower Drive Historic District at 3822 -3828 ½ South Figueroa Street. Alternative 3 would include 58 residential dwelling units, including 12 affordable units, and the development of 2,160 square feet of ground floor commercial uses.

Alternative 3 would not avoid the significant and unavoidable impacts related to historic resources because demolition of two historic contributor buildings would still occur. However, due to the lower scale of proposed development and preservation of four additional contributors, the new construction would be more visually compatible with the remaining two-story contributors to the Flower Drive Historic District and would preserve more of the remaining Flower Drive Historic District, thus reducing the severity of the significant and unavoidable impact. Changes to the setting within and immediately surrounding the Flower Drive Historic District would also be reduced. Therefore, direct and cumulative impacts to historical resources under Alternative 3 would remain significant and unavoidable, but they would be lessened as compared to the Project.

Due to the reduced number of dwelling units and commercial square footage, as well as the preservation of historic structures, Alternative 3 would result in less impacts than the Project related to operational air quality impacts, historic impacts, GHG emissions, operational noise, and public services. Impacts to VMT would be greater than the Project. In all other environmental areas analyzed above, Alternative 3 would result in similar impacts to the Project.

Although Alternative 3 would assist with the revitalization of the Project Site, Alternative 3 would provide a reduced number of residential units as compared to the Project and would therefore not as fully support the Project objectives related to the provision of additional housing that is accessible to transit, commercial, entertainment, and educational uses to the same extent as the Project, and would also fail to maximize the density of the Project Site. Similarly, the reduction in the number of both affordable and market-rate units would not meet the demand for both housing types at the same level as the Project. Therefore, Alternative 3 would not achieve the Project's basic objectives to the same extent as the Project. As such, this would also not be considered a feasible alternative.

Based on the above, the Project reflects a development that is consistent with the vision of the regional and local plans and policies to locate supporting and complementary lands uses near transit that increase housing density, promote alternative forms of transportation. 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. In addition, the Draft EIR also includes a number of mitigation measures that would reduce the potential impacts associated with the Project to the extent feasible. As such,

the benefits of the Project outlined above would outweigh the Project's significant and unavoidable historic impacts. Furthermore, as detailed in Section V, Alternatives, of this Draft EIR, no feasible alternative was identified that would eliminate the Project's significant and unavoidable impacts.

3. Significant Irreversible Environmental Changes

Section 15126.2(d) of the CEQA Guidelines 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 contribute to irreversible environmental changes. This consumption would occur during construction of the Project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that would include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation. As demonstrated below, the Project would not consume a large commitment of natural resources or result in significant irreversible environmental changes based on the consumption of resources.

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. Since publication of the Initial Study, updated demolition amounts have been provided. Demolition of all existing structures would total 49,722 square feet. Hardscape such as parking areas would be 33,942 square feet. Total demolition including structures, driveways and pavement would be 83,664 square feet. The Initial Study estimated demolition waste to be 31,400 square feet.

Nevertheless, with a higher estimated demolition amount, solid waste generated by construction of the Project would still be accommodated by the County's available regional landfills. 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 to facilitate recycling in

accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687) and the Los Angeles Green Building Code. In accordance with Assembly Bill (AB) 1826, the Project would also provide for the recycling of organic waste. The Project would adhere to State and local solid waste policies and objectives that further goals to divert waste. Thus, the consumption of non-renewable building materials, such as aggregate materials and plastics, would be reduced.

b. Water

Consumption of water during construction and operation of the Project is addressed in the Initial Study prepared for the Project, which is included as Appendix A of this Draft EIR. As evaluated therein, the estimated construction-period demand would be significantly less than the Project's estimated operational demand, which as described below, can be accommodated by the existing infrastructure. It can therefore be reasonably inferred that the existing water infrastructure would similarly meet the limited and temporary water demand associated with construction of the Project.

During operation, the Project is expected to increase water demand by 29,008 gallons per day (gpd) over existing conditions. The Project would be designed to meet CALGreen and the Title 24 Building Standards Code. Compliance with water conservation measures required by State and City green regulations would reduce this estimated projected water demand. The LADWP's 2020 Urban Water Management Plan (2020 UWMP) addresses the future of the City's water supplies and demand through the year 2045. The Project's contribution to the increase in water demand would fall within the available and projected water supplies reported in the 2020 UWMP for the City for 2045 and would constitute less than 0.01 percent of the City's projected 2045 water supply. As there would be sufficient water supplies available to serve the Project, 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. Consumption of energy during construction and operation of the Project is addressed in the Initial Study prepared for the Project, which is included as Appendix A of this Draft EIR. As stated above, energy use associated with construction of the Project would include conveyance of water used for dust control, diesel fuel consumption by on-road trucks (hauling, material delivery, and vendor trips), and off-road construction equipment and gasoline consumption by on-road worker vehicles (construction worker commute trips). Construction of the Project would require the export of building debris from the Project Site during the demolition phase as well as the delivery of building materials during the building phase. In addition, trucks and equipment used during construction activities would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Further, on-road vehicles (i.e., haul trucks, worker vehicles) would be subject to federal fuel efficiency requirements. Therefore, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Thus, impacts related to the consumption of fossil fuels during construction of the Project would be less than significant.

Electricity would be required to power the on-site construction trailer(s), perimeter lighting, etc., but is expected to be minimal compared to available supplies. Lights and trailers would be used only as needed and would be sized appropriately. Construction would not involve the on-site combustion of natural gas. Because electricity use would be limited to the temporary powering of service functions and natural gas would not be used, energy impacts during construction are considered less than significant.

During operation of the Project, energy would be consumed for multiple purposes including, but not limited to, heating, ventilating, and air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. As discussed in Appendix A of this Draft EIR, the Project would comply with Energy Efficiency Standards provisions (Part 6) of Title 24 and the CALGreen Code, the City of Los Angeles Green Building Code, and the City of Los Angeles Green New Deal. The City of Los Angeles Green Building Code contains both mandatory and voluntary green building measures that require energy conservation features that would reduce the Project's electricity demand. Specifically, the Project would include energy efficient lighting fixtures, Energy Star®-rated appliances, low-flow water features, and energy efficient mechanical heating and ventilation systems. In addition, the Project would provide 36 EV Ready spaces (all 34 of the residential spaces and 25 percent, or two, commercial spaces would be EV Ready) and would be subject to the most updated version of the California Green Building Code at time of Project filing, further encouraging a reduction in non-renewable fossil fuels usage while increasing electricity usage during operation.

Therefore, based on the above, the Project would not cause wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F of the CEQA Guidelines. In addition, Project operations would not conflict with adopted energy conservation plans. Refer to Appendix A 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 evaluated in the Initial Study prepared for the Project, which is included as Appendix A of this Draft EIR. As discussed therein, typical of many projects, construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. However, all materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions, thereby reducing the risk of hazardous materials use. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations. Accordingly, Project construction activities would not create a significant hazard to the public or the environment. Therefore, impacts would be less than significant.

During operation the use of hazardous materials would be limited to those typical of a multi-family residential and ground floor retail and restaurant mixed-use development. Hazardous materials typical of such developments are not considered environmental concerns, and their use by the Project would not differ dramatically in type and quantity from the existing multi-family residential uses on the Project Site. Moreover, the use of such materials would be subject to

compliance with existing regulations, standards, and guidelines established by the federal, state, and local agencies related to storage, use, and disposal of hazardous materials. Further, the Project Site is not located within a Methane Zone or Methane Buffer Zone.[5] Therefore, it is not expected that the Project would cause irreversible damage from environmental accidents associated with the use of typical, potentially 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 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 are concluded to 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

Section 15126.2(e) of the CEQA Guidelines 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 wastewater 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 importance to the environment.

a. Population

As discussed in the Initial Study prepared for the Project, which is included as Appendix A to this Draft EIR, the Project would construct 209 units which would provide replacement housing for approximately 51 units that would be demolished as part of the Project. Therefore, the net number of new units on the Project Site would be 158 units. Growth forecasts prepared by SCAG contained in the 2024-2050 RTP/SCS indicate that the number of households within

[5] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5037-031-015, 5037 031-016, 5037 031-001, 5037-031-002, 5037-031-003, 5037-031-004, 5037 031-005, 5037-031-006, and 5037-031-007), http://zimas.lacity.org, accessed January 24, 2025.

the City will increase from 1,398,600 in 2019 to 1,828,200 in 2050, an increase of 429,600 households.[6]

According to SCAG's 2024-2050 RTP/SCS, the forecasted households for the City of Los Angeles Subregion in 2025 is 1,481,748 households.[7] As projected in the 2024-2050 RTP/SCS, the City of Los Angeles Subregion is anticipated to have 1,551,039 households in 2030, the projected operational year of the Project.[8] Therefore, the projected household growth between 2025 and 2030 is 69,291 households.

Based on the City's average household size of 2.7, the increase of 69,291 households under the RTP/SCS in the City between 2025 and 2030 would result in an approximate increase of 187,086 persons in the City between 2025 and 2030. When utilizing the average household size of 3.35 for the South Los Angeles Community Plan area which is higher than the City, the Project's net 158 proposed units would result in a population increase of approximately 529 residents. The Project's anticipated population growth (529 persons) would represent 0.28 percent of the City's anticipated growth between 2025 and 2030. Thus, the Project's estimated population growth would be within regional growth projections for the City. Therefore, the Project's residents would be well within SCAG's population projections in the 2024-2050 RTTP/SCS for the Subregion and would not result in a significant direct growth-inducing impact.

b. Employment

Project construction would result in increased employment opportunities in the construction field, which could potentially result in increased population and housing demand in the City. However, it is assumed that construction labor for the Project would be provided by the existing local workforce in Los Angeles and in the surrounding communities. Construction workers would typically remain at a job site for the time frame in which they are needed, whether for a particular phase of Project construction or until construction is completed. Therefore, Project construction is not anticipated to require workers to relocate permanently to the City as a consequence of working on the Project, thereby resulting in substantial unplanned population growth due to an increase in workforce. The Project is estimated to created approximately 15 new employees on the Project Site which would be within regional growth projections for the City. According to SCAG's 2024-2050 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2025 is 1,989,555 employees.[9] As projected in the 2024-2050 RTP/SCS, the City of Los Angeles Subregion is anticipated to have 2,019,184 employees in 2030, the projected operational year of the Project.[10] Therefore, the projected employment growth between 2025 and 2030 is 29,629 employees. The Project's estimated 15 employees would constitute approximately 0.05 percent of the employment growth forecasted between 2025 and 2030. Thus, the Project

6 SCAG, Connect SoCal 2024 Demographics and Growth Forecast, April 4, 2024, page 39, https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf?1712261839, accessed August 2, 2024.

7 Based on a linear interpolation of SCAG's population data for 2019 (1,398,600) and 2050 (1,828,200). The 2025 value is extrapolated from 2019 and 2050 values: [((1,828,200-1,398,600) / 31) * 6] + 1,398,600 = 1,481,748.

8 Based on a linear interpolation of SCAG's population data for 2019 (1,398,600) and 2050 (1,828,200). The 2030 value is extrapolated from 2019 and 2050 values: [((1,828,200-1,398,600) / 31) * 11] + 1,398,600 = 1,551,039.

9 Based on a linear interpolation of SCAG's employment data for 2019 (1,954,000) and 2050 (2,137,700). The 2025 value is extrapolated from 2019 and 2050 values: [((2,137,700-1,954,000) / 31) * 6] + 1,954,000 = 1,989,555..

10 Based on a linear interpolation of SCAG's employment data for 2019 (1,954,000) and 2050 (2,137,700). The 2030 value is extrapolated from 2019 and 2050 values: [((2,137,700-1,954,000) / 31) * 11] + 1,954,000 = 2,019,1849..

would not cause an exceedance of SCAG's employment projections contained in the 2024-2050 RTP/SCS. Therefore, the Project would not result in a significant direct growth-inducing impact.

c. Utility Infrastructure Improvements

The area surrounding the Project Site is already developed with residential, commercial, educational, institutional, and entertainment-related uses, and the Project would not remove impediments to growth. The Project Site is located within an urban area that is currently served by existing utilities and infrastructure. While the Project would require the construction of new, on-site water distribution lines and telecommunications connections as well as minor local infrastructure upgrades to maintain and improve water and telecommunications onsite, such improvements would be limited to servicing Project-related demand and would not necessitate major local or regional utility infrastructure improvements that have not otherwise been accounted for 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 vehicle miles traveled. Any access improvements would be limited to a new driveway with an access gate along South Flower Drive 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

Section 15126.4(a)(1)(D) of the CEQA Guidelines 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 would require the installation of an Interpretive Display that would include a brief history of the area as well as the district and its significance within the context of multi-family residential housing development. The Interpretive Display would be located visible from the public right-of-way along South Flower Drive between West 38th Street and West 39th Street. Mitigation Measure CUL-MM-2 would require the preparation of a California Register historic district nomination for the contributing buildings remaining after construction of the Project. These mitigation measures are actions that would not affect the physical environment and would be beneficial in reducing impacts to historical resources. While the implementation of CUL-MM-1

and CUL-MM-2 would not reduce direct impacts to less than significant, these Mitigation Measures would not result in adverse secondary impacts.

b. Noise

Mitigation Measure NOI-MM-1 requires that power construction equipment (including combustion engines), fixed or mobile, shall be equipped with noise shielding and muffling devices consistent with manufacturers' standards or the Best Available Control Technology. Mitigation Measure NOI-MM-2 requires that all outdoor mechanical equipment (e.g., generators, compressors) shall be enclosed or visually screened. The equipment enclosure or screen shall be impermeable (i.e., solid material with minimum weight of two pounds per square feet) and break the line-of-sight between the equipment and any off-site Noise Sensitive Uses. Mitigation Measure NOI-MM-3 requires that construction staging areas shall be located as far from Noise-Sensitive Uses as reasonably possible and technically feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints. Mitigation Measure NOI-MM-4 requires that noise barriers, such as temporary walls (minimum ½-inch thick plywood) or sound blankets (minimum STC 25 rating), that are a minimum of eight feet tall, shall be erected between construction activities and Noise-Sensitive Uses to achieve a minimum reduction of 5 dBA at sensitive residential receptors located adjacent to the west and south of the Project Site.

In regard to vibration, Mitigation Measure NOI-MM-5 requires that prior to demolition, grading/excavation, or construction, the Applicant shall retain a Qualified Structural Engineer who shall prepare a survey establishing baseline structural conditions of potentially affected structures and a Vibration Control Plan, which shall include methods to minimize vibration. Mitigation Measure NOI-MM-6 requires that prior to construction, the Applicant shall retain a contractor to manage Project construction, and in particular, ensure that when in operation, construction equipment remain their respective distances away from any adjacent residential structures to ensure that vibration velocities do not exceed 93 VdB. Mitigation Measure NOI-MM- 7 requires that in the event of damage to any non-historic building due to construction vibration, as verified by the Qualified Structural Engineer, a letter describing the damage to the impacted building(s) and recommendations for repair shall be prepared by the Qualified Structural Engineer within 60 days of the time damage occurred. Repairs shall be undertaken and completed, at the Owner's or Applicant's expense, in conformance with all applicable codes. These Mitigation Measures represent procedural actions and would be beneficial in protecting noise/vibration sensitive uses and buildings adjacent to the Project Site. In addition, any temporary noise barriers that would be installed during construction would be short-term and would be required to comply with the City's noise regulations. Upon completion of construction, temporary noise barriers would be removed. As such, implementation of these mitigation measures would not result in adverse secondary impacts.

6. Effects Not Found To Be Significant

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

is included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City of Los Angeles determined through the Initial Study that the Project would not have the potential to cause significant impacts related aesthetics; agriculture and forestry resources; air quality (objectionable odors); biological resources; energy; geology and soils; hazards and hazardous materials; hydrology and water quality; land use and planning (physical division of an established community); mineral resources; noise (airport and airstrip noise); population and housing; public services (schools, parks, and libraries); recreation; transportation (hazardous geometric design features; utilities and service systems; and wildfire. A summary of the analysis provided in Appendix A for these issue areas is provided below.

a. Aesthetics

As detailed in the Initial Study, pursuant to PRC Section 21099, the Project is a mixed-use residential project that would be located on an infill site within a TPA. Therefore, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA. Therefore, as concluded in the Initial Study, impacts would be less than significant.

b. Agriculture and Forestry Resources

The Project Site is located in an urbanized area of the City of Los Angeles. The Project Site and surrounding area are not zoned for agricultural or forest uses, and no agricultural or forest lands occur onsite or in the vicinity of the Project Site. Therefore, as concluded in the Initial Study, no impacts to agriculture and forestry resources would occur.

c. Air Quality (Objectionable Odors)

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

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

Construction and operation of the Project would also be required to comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations. In particular, Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause injury or damage to business or property. Therefore, as concluded in the Initial Study, with compliance

with existing regulatory requirements, the Project would result in a less than significant impact to emissions leading to odors adversely affecting a substantial number of people.

d. Biological Resources

The Project Site is in an urbanized area and is developed with existing residential uses and surface parking. There are no undeveloped natural open space areas within or near the Project Site. There are currently no active rare, endangered, or threatened habitats listed by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFW) in the Project Site or surrounding area. Additionally, there are no known locally designated natural communities at the Project Site or in the immediate vicinity, nor is the Project Site located immediately adjacent to undeveloped natural open space or a natural water source that may otherwise serve as habitat for state or federally listed species. Species likely to occur on the Project Site are limited to small terrestrial and avian species typically found in developed settings. Based on the lack of species habitat on the Project Site and in the surrounding areas, it is unlikely that any special status species listed by the CDFW or by the USFWS would be present on the Project Site.

The Tree Assessment Report prepared for the Project did not find any protected trees listed in the City's Protected Tree Ordinance on the Project Site. The Project Site currently contains 23 trees, including nine street trees. The nine existing street trees are proposed to be retained in the Project's landscaping plan. The remaining 14 on-site trees are planned for removal. Per LAMC Section 12.21 G, 53 trees are required (one tree per four units) by the Project. The Project would provide 54 new trees on the Project Site for a total of 63 trees. Though it is not planned, any future need for the removal and placement of street trees would be subject to the review and approval of the Board of Public Works, Urban Forestry Division.

The Project would comply with the Migratory Bird Treaty Act (MBTA), which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird, except under the terms of a valid permit issued pursuant to federal regulations. The Project would further comply with the MBTA regulations by conducting tree or vegetation removal activities outside of the nesting season (February 1–August 31), to the extent feasible, and, if tree or vegetation removal activities occur during the nesting season, the Applicant would retain a biological monitor during the removal activities to ensure that no active nests would be impacted. If active nests are found, a 300-foot buffer (500-foot for raptors) would be established until the fledglings have left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and is based on the professional judgment of the monitoring biologist, in coordination with the CDFW, as appropriate. Additionally, the Project would comply with California Fish and Game Code Section 3503, which states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." In the event that any of the existing street trees need to be removed, the Project would include their replacement at a 2:1 ratio in accordance with the Bureau of Street Services, Urban Forestry Division's requirements and Street Tree Ordinance No. 153500.

As such, the Initial Study concluded that Project impacts to biological resources would be less than significant.

e. Energy

The Project is required to comply with California's Energy Efficiency Standards established in Title 24, Part 6, of the California Code of Regulations (CCR). These standards were first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards have since been continuously updated by the California Energy Commission on an approximately three-year cycle to allow for the incorporation of new energy efficiency technologies and methods.

During the construction phase, the Project would comply with regulatory compliance measures intended to conserve energy. These measures would include restricting haul truck trips to off-peak hours, not allowing engines to idle in excess of five minutes when not in use (CARB Air Toxics Control Measure) and using fuel that meets specified fuel and fuel additive requirements and emission standards (CCR Title 13, Section 2485). These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. As such, Project construction would have a minimal effect on the local and regional energy supplies.

Regarding operations, with regulatory compliance and incorporation of energy conservation features such as energy-efficient heating, ventilation, and air conditioning (HVAC), lighting systems, and ENERGY STAR® appliances, the Project's electricity demand would be reduced, and therefore, Project operation would not result in the wasteful, inefficient, or unnecessary consumption of electricity. Regarding transportation-related fuels, the Project would improve mobility and accessibility, encourage transit use and walking/bicycle trips, and reduce VMT and GHG emissions by intensifying urban density in proximity to transit and destinations. As such, Project operation would not result in wasteful, inefficient or unnecessary consumption of petroleum-based fuels, but would promote walking, biking, and other modes of transportation.

Additionally, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. All of the Project's electricity demands would be served by LADWP. Further, the Project would comply with the California Title 24 energy standards, the 2019 CALGreen Code, the City of Los Angeles Green Building Code, City of LA Green New Deal, and the 2024–2050 RTP/SCS, which contain conservation policies that are mandatory under the City's Building Code. As such, as concluded in the Initial Study, the Project would not conflict with applicable plans for renewable energy or energy efficiency.

f. Geology and Soils

There are no known active faults that have been mapped within the Project Site, and the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone. As noted in the Initial Study, considering the locations of these mapped faults relative to the Project Site, the potential impact of surface fault rupture occurrence at the Project Site is considered to be low. The Project would not contain uses or activities, such as mining operations or deep excavation into the earth, that would exacerbate the activity of a known earthquake fault. As such, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death, related to rupture of a known earthquake fault.

The design and construction of the Project would comply with all existing applicable regulatory requirements, the applicable provisions of the Los Angeles Building Code relating to seismic safety, and would utilize accepted and proven construction engineering practices. As discussed in the Geotechnical Report, while the Project Site is subject to strong ground shaking in the event of an earthquake, this hazard is common in Southern California and the effects of ground shaking can be addressed by proper engineering design and construction in conformance with current building codes and engineering practices. The Geotechnical Report provides site-specific seismic design parameters based on the uses proposed and soil conditions at the Project Site. As such, the Initial Study concluded that impacts related to strong seismic ground shaking would be less than significant.

The Project Site is not mapped within an area prone to liquefaction. As concluded in the Initial Study, impacts associated with liquefaction would be less than significant. Soils at the Project Site are also considered to have very low expansion potential. As further concluded in the Initial Study, due to the relatively level ground on and surrounding the Project Site, the potential for seismically induced landslides on the Project Site is low.

Development of the Project would require grading, excavation, and other construction activities that have the potential to disturb existing soils within the Project Site and expose these soils to rainfall and wind during construction, thereby potentially resulting in soil erosion. The Project would implement standard erosion control measures during site preparation and grading activities. In accordance with the requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) adhering to the California Stormwater Quality Association Best Management Practices (BMP) Handbook. The SWPPP would set forth BMPs to be used during construction to manage and control stormwater and non-stormwater discharges, including, but not limited to, erosion control and sediment control with sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management,. Additionally, the potential for erosion would be reduced by implementation of required regulatory erosion controls imposed during Project Site preparation and grading activities. Following the completion of construction, the potential for erosion would be relatively low since the Project Site would be largely impervious and the Project would be required to comply with the City's Low Impact Development (LID) Ordinance (Ordinance No. 183,833) and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Therefore, as determined in the Initial Study, with compliance with applicable regulatory requirements, impacts related to substantial soil erosion or the loss of topsoil would be less than significant.

The Project Site is located in a developed area of the City, which is served by a wastewater collection, conveyance, and treatment system operated by the City. The Project would connect to the existing sewer and wastewater system. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, as concluded in the Initial Study, no impacts would occur.

As indicated in the Initial Study, no known paleontological resources were identified within the Project Site. The Project Site has been developed in the past, and it is unlikely that any fossil-bearing soils would be encountered at these layers.

The Paleontological Resources Assessment concludes that there is a moderate-to-high sensitivity for paleontological resources within soils at depths of 25 feet or deeper below ground surface (bgs) in the Pleistocene layer. Excavation for the Project would reach a maximum depth of ten feet bgs. Therefore, excavation for the Project would not reach the sediment deposit most likely to contain paleontological resources, which is the Pleistocene layer. The City has established a standard condition of approval to address inadvertent discovery of paleontological resources that would apply to the Project. In the event that any prehistoric subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

Therefore, as concluded in the Initial Study, with compliance with the City's standard condition of approval, impacts to paleontological resources or sites or unique geologic features would be less than significant.

g. Hazards and Hazardous Materials

Typical of many projects, construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. However, all materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions, thereby reducing the risk of hazardous materials use. In addition, the Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials. These existing regulations address the amount of hazardous materials used, accident prevention, protection from exposure to specific chemicals, and the proper storage and disposal of hazardous materials. Therefore, as concluded in the Initial Study, any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations.

Operation of the Project would be expected to involve the use and storage of small quantities of potentially hazardous materials typical of those used in residential, retail and restaurant uses, including cleaning solvents, painting supplies, pesticides for landscaping, and petroleum products by building operational staff and hired contract professionals. However, all such potentially hazardous materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable federal, state, and local regulations. Therefore, as concluded in the Initial Study, any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations.

A recognized environmental condition (REC) is defined as the presence or likely presence of hazardous substances or petroleum products in, on, or at a property: 1) due to release to the environment; 2) under conditions indicative of a release to the environment; or 3) under conditions

that pose a material threat of a future release to the environment. The Phase I Environmental Site Assessment (ESA) prepared for the Project identified a former gas station 0.4 miles from the Project Site, and no records of hazardous materials spills or violations associated with the Project Site or the former gas station are addressed. [11]

Additionally, historical records indicate that the existing residential buildings on the Project Site were constructed in the 1920s. While not considered RECs, asbestos-containing materials (ACM) and lead-based paint (LBP) may be present in the existing buildings. The Project would be required to comply with existing regulations that comprehensively address governmental reporting requirements and the removal, transport, and disposal of ACMs and LBP that may be within the existing structure. In accordance with SCAQMD Rule 1403, the Project Applicant would be required to conduct a comprehensive asbestos survey prior to demolition, subject to approval by LADBS. In the event that ACMs are found, all demolition, transport, and disposal of known and suspected asbestos would be required to adhere to the regulations established in the California Code of Regulations, Title 8, Section 341.6I; Code of Federal Regulations, Title 29, Section 1926.1101(b); Code of Federal Regulations, Title 40, Part 61, Subpart M; and SCAQMD Rule 1403. Demolition, transport, and disposal of known and suspected LBP would be required to adhere to the regulations established in the Code of Federal Regulations, Title 24, Section 35.86; Code of Federal Regulations, Title 40, Section 745.103; Code of Federal Regulations, Title 29, Section 1926.62; and California Code of Regulations, Title 8, Section 1532.1.

In addition, development of the Project would include the use of commercially sold construction materials without asbestos or ACMs. Adherence to these regulations and procedures would ensure that all ACMs and LBP currently present on the Project Site would be remediated and disposed of in accordance with federal, state, and local regulations during Project demolition activities. Therefore, as concluded in the Initial Study, the Project would not create a significant hazard to the public or environment through upset and accident conditions involving the release of ACMs or LBP into the environment.

A previous Phase I ESA that was prepared for the Project Site noted that undocumented underground features, such as underground storage tanks (USTs) used for heating oil and basements, are common in the general area surrounding the Project Site.[12] Despite the findings of the previous Phase I ESA, there is strong evidence to suggest that no such USTs, basements, buried debris, waste drums, or tanks would be located beneath the Project Site. As such, the Phase I ESA determined that there is a very low potential for undocumented contamination sources to be encountered underground. Therefore, the Phase I ESA concluded that undocumented underground features are not a REC. Therefore, as concluded in the Initial Study, significant hazards related to the release of hazardous materials into the environment during construction related to undocumented underground features would be less than significant.

The use of minor amounts of hazardous materials during operation of the Project would be limited to those typical of a multi-family residential and ground floor retail and restaurant mixed-use development. Hazardous materials typical of such developments are not considered environmental concerns, and their use by the Project would not differ dramatically in type and

[11] Phase I Environmental Site Assessment, Kimley-Horn and Associates, Inc., August 29, 2024. Appendix A of this Draft EIR.
[12] Phase I Environmental Site Assessment, Kimley-Horn and Associates, Inc., August 29, 2024. Appendix A of this Draft EIR.

quantity from the existing multi-family residential uses on the Project Site. Moreover, the use of such materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, state, and local agencies related to storage, use, and disposal of hazardous materials. Therefore, as concluded in the Initial Study, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment resulting from Project operations.

The Project Site is located 0.13 miles southeast of the Dr. Theodore T. Alexander, Jr. Science Center School. The next closest schools to the Project Site include the University of Southern California located 0.3 miles to the north of the Project Site, and Clinton Middle School and Animo Jackie Robinson Charter High School located 0.4 miles northeast of the Project Site. As previously discussed, all ACMs and LBP would be removed during construction in accordance with applicable regulatory requirements which would reduce potential impacts to a less than significant level. Project construction would involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids, and Project operation would also involve the limited use of hazardous materials typically used in the maintenance of retail and restaurant and residential uses including cleaning solutions, solvents, pesticides for landscaping, painting supplies, and petroleum products. However, all potentially hazardous materials would be used, stored, and disposed of according to manufacturers' specifications and in compliance with applicable federal, state, and local regulations. Therefore, as concluded in the Initial Study, the use of such materials would not create a significant hazard to nearby schools.

California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste, and submit such information to the Secretary for Environmental Protection on at least an annual basis, known as the Cortese List. As concluded in the Initial Study, the Project would not create a significant hazard to the public or the environment as a result of its listing on the above databases compiled pursuant to Government Code Section 65962.5

The Project Site is not located within two miles of an airport or within an airport planning area and would not have the potential to result in a safety hazard or excessive noise for people residing or working near an airport. Therefore, as concluded in the Initial Study, no impacts would occur. While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary partial lane closures. However, both directions of travel on area roadways would be maintained in accordance with the Construction Traffic Management Plan that would be prepared for the Project. This would ensure adequate disaster route circulation and emergency access.

Operation of the Project would generate traffic in the Project vicinity and would result in some modifications to site access. However, the Project would comply with LAFD access requirements and would not impede emergency access within the Project vicinity. In addition, the Project does not include improvements that would require the installation of any barriers that would impede emergency response within and in the vicinity of the Project Site. Therefore, the

Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan. Thus, as concluded in the Initial Study, impacts related to implementation of the City's Emergency Response Plan would be less than significant.

The Project Site is located in an urbanized area without any wild lands in the vicinity. In addition, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone. Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety, and the proposed uses would not create a fire hazard that has the potential to exacerbate wildfire risks. Therefore, as concluded in the Initial Study, no impacts would occur.

h. Hydrology and Water Quality

Grading and construction activities would temporarily expose the underlying soils and may make the Project Site temporarily more permeable. Also, exposed and temporarily stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff.

However, as the construction site would be greater than one acre, the Project would be required to obtain coverage under the NPDES General Construction stormwater permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that would specify BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution.

In addition, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, through compliance with all NPDES General Construction Permit requirements, implementation of BMPs, and compliance with applicable City grading regulations, the Project would not result in discharges that would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water quality. With regulatory compliance, such activities would not conflict with implementation of a water quality control plan. Therefore, as concluded in the Initial Study, construction-related impacts to surface water quality would be less than significant.

During operation, the Project would be subject to the provisions of the City’s LID Ordinance (Ordinance 183,833) which requires that post-construction stormwater runoff from new projects be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the 85th percentile, 24-hour storm event. The Project would incorporate appropriate LID BMPs in accordance with the City’s LID Ordinance intended to control and treat stormwater runoff in compliance with LID.

As noted in the Civil Engineering Report included as Appendix G of the Initial Study, the Project would be designed to maintain or reduce stormwater runoff by implementing measures to

minimize flows leaving the Project Site. The Project Site would implement a drywell system.[13] Due to incorporation of the required LID BMPs, operation of the Project would not result in discharges that would violate any water quality standards or waste discharge requirements (WDRs) or otherwise substantially degrade surface or ground water quality. As concluded in the Initial Study, the Project would not interfere with the implementation of a water quality control plan or WDRs and impacts would be less than significant.

As discussed in the Initial Study, Project construction activities are not expected to encounter groundwater and temporary dewatering may not be required. In the event groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable NPDES requirements related to construction and discharges from dewatering operations. Although not anticipated at the Project Site, any contaminated soils found would be captured within that volume of excavated material, removed from the Project Site, and remediated at an approved disposal facility in accordance with regulatory requirements. Compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste, would reduce the potential for the construction of the Project to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. In addition, as there are no groundwater production wells or public water supply wells within one mile of the Project Site, construction activities would not be anticipated to affect existing wells. Therefore, construction of the Project would not violate any water quality standards or WDRs or otherwise substantially degrade groundwater quality. As construction activities are not expected to encounter existing groundwater supplies, it would not conflict with the implementation of a sustainable groundwater management plan. Therefore, as concluded in the Initial Study, impacts on groundwater quality would be less than significant.

Operational activities which could affect groundwater quality include hazardous material spills and leaking underground storage tanks. No underground storage tanks are currently operated or will be operated by the Project. In addition, while the development of the Project would include use of typical residential and retail and restaurant on-site hazardous materials such as paint, pesticides, and cleaning solvents, compliance with all applicable existing regulations at the Project Site regarding the handling of hazardous materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated.

Furthermore, operation of the Project would not require extraction from the groundwater supply based on the depth of excavation for the proposed uses and the depth of groundwater below the Project Site. Therefore, as concluded in the Initial Study, Project operations would not violate any water quality standards or WDRs with respect to groundwater or otherwise substantially degrade ground water quality.

[13] A system of drywells would facilitate the infiltration of stormwater at the site, with overflow directed to the adjacent storm drain system. A state-of-the-art drywell would be designed to infiltrate stormwater into native soils to recharge groundwater reserves and mimic the natural/pre-development water cycle. Each system includes one or two pre-treatment chambers that remove pollutants through settling, screening, and hydrocarbon absorption.

As described in the Initial Study, groundwater was not encountered during explorations to a depth of 51 feet bgs, and excavation for the Project will reach a maximum depth of ten feet bgs. Therefore, excavation for the Project is not anticipated to encounter groundwater. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations. Therefore, as concluded in the Initial Study, the Project would not substantially deplete groundwater supplies, including in a manner that would result in a net deficit in aquifer volume or lowering of the local groundwater table and impacts related to groundwater would be less than significant.

Project construction activities, particularly including demolition and grading, have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. In addition, exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. On-site watering activities to reduce airborne dust could also contribute to pollutant loading in runoff, including into nearby storm drains. However, as discussed above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows from both stormwater and non-stormwater discharges. These BMPs would be designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. In addition, Project construction activities would occur in accordance with City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion to be incorporated into the Project SWPPP. Thus, through compliance with all NPDES General Construction Permit requirements and a SWPPP that includes implementation of BMPs required by the NPDES program, as well as compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. As determined in the Initial Study, construction-related impacts regarding erosion and siltation would be less than significant.

With the implementation of regulatory compliance requirements, the Project would not create or contribute to runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. As determined in the Initial Study, project impacts on the capacity of stormwater drainage systems and on polluted runoff would be less than significant.

As described in the Initial Study, the Project Site is not located within a flood hazard zone. The Project Site is partially within a 0.2 Percent Annual Chance Flood area. Based on this information, the potential for flooding at the Project Site is considered low. Further, the Project Site is not within a tsunami hazard area. There are no standing bodies of water near the Project Site that may experience a seiche, and therefore there is no significant risk that flows from a seiche could result in the discharge of any pollutants from the Project Site caused by the Project.

The Project Site is located within the potential inundation area for the Los Angeles Department of Water and Power (LADWP) Hollywood Reservoir held by Mulholland Dam. This dam, as well as others in California, are continually monitored by the State of California Division

of Safety of Dams and the U.S. Army Corps of Engineers to guard against the threat of dam failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum design basis earthquake for the site. Given the distance of the Mulholland Dam to the Project Site and the oversight by the Division of Safety of Dams, including regular inspections, the potential for substantial adverse impacts related to inundation at the Project Site as a result of dam failure would be less than significant. Therefore, as determined in the Initial Study, the risk of flooding from a tsunami, inundation by a seiche, or dam failure is considered low. Impacts would be less than significant, and no mitigation measures are required.

As determined in the Initial Study, the Project would not introduce new pollutants or an increase in pollutants that would conflict with or obstruct any water quality control plans for the Ballona Creek Watershed. The Project would comply with all provisions of the NPDES program and other applicable NPDES permits and WDRs, and it would not obstruct implementation of the LARWQCB's Basin Plan. As determined in the Initial Study, impacts would be less than significant.

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

The Project involves the development of a seven-story mixed-use residential and commercial development that includes 209 apartment units and 2,705 square feet of ground level retail and restaurant uses. Existing uses on the Project Site include seven two-story multi-family residential buildings that are part of the Flower Drive Historic District along South Flower Drive, a two-story multi-family residential building, and surface parking along South Figueroa Street. The Project would remove the existing multi-family dwelling units and surface parking to construct the Project.

The area surrounding the Project Site is highly urbanized and includes a mix of low- to mid-rise buildings containing a variety of commercial, residential, and public facilities uses. The surrounding properties are generally zoned C2-1L, RD1.5-1, and PF-1, which are generally consistent with the zoning on the Project Site. The proposed uses would be consistent with existing land uses in the surrounding area. All proposed development would occur within the boundaries of the Project Site as it currently exists, and the Project would not require the vacation of any surrounding streets adjacent to the Project Site. Furthermore, the Project does not propose a freeway or other large infrastructure that could divide the existing surrounding community. Access to all surrounding properties would continue to be available upon buildout of the Project. Therefore, the Project would not physically divide, disrupt, or isolate an established community. Rather, implementation of the Project would result in infill development of an already developed community with similar and compatible land uses. As determined in the Initial Study, impacts would be less than significant.

j. Mineral Resources

No mineral extraction operations currently occur on the Project Site. The Project Site is located in an urbanized area and has been previously disturbed by development. As such, the potential for mineral resources to occur on-site is low. The Project Site is located within a Mineral

Resource Zone 2 Area (MRZ-2)14 which identifies "areas underlain by mineral deposits where geologic data indicate that significant measured or indicated resources are present or where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists".

As noted in the South Los Angeles and Southeast Los Angeles Community Plan Draft EIR, although these areas are classified as MRZ-2, no aggregate mineral extraction activities currently occur in the South Los Angeles or Southeast Los Angeles Community Plan areas. These areas are built out with urban uses making them inaccessible for such activities. The Project Site is also not located within a City-designated oil field or oil drilling area, and no oil wells are present on the Project Site. Therefore, as noted in the Initial Study, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site.

k. Noise (Airport and Airstrip Noise)

There are no private airstrips in the vicinity of the Project Site. The nearest airport to the Project Site is the Los Angeles International Airport approximately nine miles southwest of the Project Site. As the Project Site is located further than two miles from a public airport, the Project would not expose people residing or working in the Project area to excessive noise levels. Therefore, as determined in the Initial Study, no impact would occur.

l. Population and Housing

Growth forecasts prepared by SCAG contained in the 2024-2050 RTP/SCS indicate that the number of households within the City will increase from 1,398,600 in 2019 to 1,828,200 in 2050, an increase of 429,600 households.[15] The Project would include 209 units which would provide replacement housing for approximately 51 units. Therefore, the net number of new units on the Project Site would be 158 units.

Additionally, the City's General Plan Housing Element for the 2021-2029 planning period has an objective of constructing 456,643 housing units for the entire City of Los Angeles, of which 184,721 units (40 percent) are designated for very low and low-income households.[16] The Project's proposed net 158 units would represent 0.03 percent of the number of new units planned to be constructed by the City per the Housing Element. The Project's anticipated contribution to net household growth in the City (158 households) would represent 0.03 percent of the City's anticipated household growth between 2021 and 2029 forecasted by the City's General Plan Housing Element.

According to SCAG's 2024-2050 RTP/SCS, the forecasted households for the City of Los Angeles Subregion in 2025 is 1,481,748 households.[17] As projected in the 2024-2050 RTP/SCS, the City of Los Angeles Subregion is anticipated to have 1,551,039 households in 2030, the

[14] South Los Angeles and Southeast Los Angeles Community Plan Draft EIR, 2016.
[15] SCAG, Connect SoCal 2024 Demographics and Growth Forecast, April 4, 2024, page 40, https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf, accessed February 11, 2026.
[16] City of Los Angeles, 2021-2029 Housing Element. https://planning.lacity.gov/odocument/3d0775b4-6e54-4294-ad5a-85df6b8eaf82/Executive_Summary_(Adopted).pdf, accessed August 30, 2024.
[17] Based on a linear interpolation of SCAG's population data for 2019 (1,398,600) and 2050 (1,828,200). The 2025 value is extrapolated from 2019 and 2050 values: [((1,828,200-1,398,600) / 31) * 6] + 1,398,600 = 1,481,748.

projected operational year of the Project.[18] Therefore, the projected household growth between 2025 and 2030 is 69,291 households. The Project's anticipated 158 households would represent 0.23 percent of the household growth forecasted by SCAG's 2024-2050 RTP/SCS. Thus, the Project's estimated household growth would be within regional growth projections for the City.

Based on the City's average household size of 2.7, the increase of 69,291 households under the RTP/SCS in the City between 2025 and 2030 would result in an approximate increase of 187,086 persons in the City between 2025 and 2030. When utilizing the average household size of 3.35 for the South Los Angeles Community Plan area which is higher than the City, the Project's net 158 proposed units would result in a population increase of approximately 529 residents. The Project's anticipated population growth (529 persons) would represent 0.28 percent of the City's anticipated growth between 2025 and 2030. Thus, the Project's estimated population growth would be within regional growth projections for the City.

Project construction would result in increased employment opportunities in the construction field, which could potentially result in increased population and housing demand in the City. However, it is assumed that construction labor for the Project would be provided by the existing local workforce in Los Angeles and in the surrounding communities. Construction workers would typically remain at a job site for the time frame in which they are needed, whether for a particular phase of Project construction or until construction is completed. Therefore, Project construction is not anticipated to require workers to relocate permanently to the City as a consequence of working on the Project, thereby resulting in substantial unplanned population growth due to an increase in workforce.

Overall, as determined in the Initial Study, although the Project may result in direct population growth from future residents relocating to the City, the Project would not induce substantial unplanned population growth exceeding regional population projections. As determined in the Initial Study, impacts would be less than significant.

Furthermore, all existing households would be subject to the Rent Stabilization Ordinance (RSO) and lower income households on the Project Site are entitled to relocation benefits subject to Government Code Section 7260 et seq., and the right of first refusal (Right to Return) to a comparable unit (same bedroom type) when the Project is completed.

Therefore, as determined in the Initial Study, the Project would not displace substantial numbers of people necessitating the construction of replacement housing elsewhere. Impacts would be less than significant, and no mitigation measures would be required.

m. Public Services (Schools, Parks, Libraries)

(1) Schools

The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). The Project Site is located within the attendance boundaries of Menlo Avenue Elementary School, William Jefferson Clinton Middle School, and Manual Arts High School. As

[18] Based on a linear interpolation of SCAG's population data for 2019 (1,398,600) and 2050 (1,828,200). The 2030 value is extrapolated from 2019 and 2050 values: [((1,828,200-1,398,600) / 31) * 11] + 1,398,600 = 1,551,039.

noted by the LAUSD, no new school construction is planned.[19] According to the LAUSD, for the school calendar year of 2023-2024, the William Jefferson Clinton Middle School is over capacity by 177 seats, with no overages reported for Menlo Avenue Elementary School or Manual Arts High School. According to five-year capacity projections for these three schools, there are no anticipated future overcrowding or over capacity issues.[20]

Given the temporary nature of work on the Project Site and given the large construction labor pool that can be drawn upon in the region, construction employees would not be expected to relocate residences (and, therefore, a student population) within this region or move from other regions as a result of their temporary work on the Project Site. Therefore, Project construction would not result in a notable increase in the resident population or generate new students needing to attend local schools. As determined in the Initial Study, impacts would be less than significant. The Project could generate a net increase of 32 elementary students, ten middle school students, 17 high school students, and four special day care students for a total of 63 students.[21] This would be an incremental increase in student population that would have a negligible impact on the schools serving the Project Site. It should be noted that this analysis also includes students who may enroll in private schools or participate in home schooling. In addition, this analysis does not account for Project residents who may already reside within the school attendance boundaries and would move to the Project Site.

Pursuant to Section 65995 of the California Government Code, the Project applicant would be required to pay fees in accordance with Senate Bill (SB) 50. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project in question are at capacity or not. Pursuant to Section 65995(h) of the California Government Code, payment of such fees is deemed full mitigation of a project's development impacts.[22] Project operational impacts to schools would be less than significant. Project operation would not result in substantial adverse physical impacts associated with the provision of new or physically altered schools, the construction of which would cause significant environmental impacts. As determined in the Initial Study, operational impacts on schools would be less than significant.

(2) Parks

Given the temporary nature of construction activities, construction of the Project would not introduce a permanent population to an area which could result in an increase in the use of the existing parks and recreational facilities that would lead to the need for new parks or recreational facilities or the expansion of existing facilities. Additionally, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work location and are more likely to utilize parks and recreation facilities near their places of residence. Thus, construction of the Project would not generate a demand for park facilities adequately accommodated by existing or planned facilities

[19] Appendix H-2 of the Initial Study.
[20] Appendix H of the Initial Study.
[21] See School Enrollment Calculations, Appendix H-2 of the Initial Study, for detailed calculations.
[22] Government Code Section 65995(h) states in part: "The payment or satisfaction of a fee … specified in Section 65995 …are hereby deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property … on the provision of adequate school facilities."

and services. As determined in the Initial Study, impacts on parks during Project construction would be less than significant.

Parks and recreational services are provided by the Los Angeles Department of Recreation and Parks (RAP). The Project Site is currently developed, and no existing parks or recreational facilities are located on-site. RAP has identified 18 neighborhood parks within a two-mile radius of the Project Site, 54 community parks located within a five-mile radius of the Project Site, and 15 regional parks located within a ten-mile radius of the Project Site.[23] For a comprehensive list, see Appendix H-1, Public Services Correspondence, of the Initial Study. The South Los Angeles Community Plan area has a parkland acres-to-population ratio of 0.31 acres per 1,000 residents. The Public Recreation Plan, a portion of the Public Facilities and Services Element of the City's General Plan, sets a goal for parkland acres-to-population ratio of neighborhood and community parks of 2.0 acres per 1,000 residents.[24]

According to the Los Angeles General Plan Public Recreation Plan, an overall provision of ten acres of land per 1,000 residents for total recreational facilities is recommended, and a minimum of ten percent of the City's total land area should be dedicated to public recreation or open space. The City's Open Space Element recommends that private developments provide open spaces, wherever practical, for the benefit of the public as a whole to help fulfill the recreational needs of the City.

An increase in the use of existing park and recreational facilities is directly associated with an increase in population. When utilizing the average household size of 3.35 for the South Los Angeles Community Plan area, the Project's net increase of 158 units would result in a population increase of 529 residents. The Project would provide a total of 23,127 square feet of open space per LAMC requirements. Open space would consist of 300 square feet of private patios, 14,865 square feet of courtyard areas on the first and second floors, 2,252 square feet of roof decks on the seventh floor and 5,710 square feet of various indoor amenities such as a club room, fitness room, and lounge area. Due to the amount, variety, and availability of the proposed open space and recreational amenities to be provided within the Project Site, it is anticipated that Project residents would generally utilize on-site open space to meet their recreational needs. Thus, while the Project's residents would be expected to use off-site public parks and recreational facilities to some degree, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site parks or recreational facilities given the provision of on-site open space and recreational amenities. As determined in the Initial Study, compliance with regulatory requirements including the payment of park fees pursuant to LAMC Section 12.33 would ensure that the Project's potential impacts on parks would not be significant.

(3) Libraries

Other public facilities include library facilities. The Project would be served by the following libraries: Junipero Serra Branch Library (one mile southeast of the Project Site), Exposition Park

[23] Correspondence from Cathie M. Santo Domingo, Assistant General Manager and Darryl Ford Superintendent, Los Angeles Department of Recreation and Parks, dated August 29, 2024. Appendix H-1 of the Initial Study.

[24] City of Los Angeles General Plan, Public Facilities and Services Element, January 1969, https://planning.lacity.gov/odocument/43319adf-80e9-4080-8d1d-ed7b3d3e2607/Public%20Facilities.pdf, accessed February 18, 2025.

- Dr. Mary McLeod Bethune Regional Branch Library (1.5 miles west of the Project Site), and Vermont Square Branch Library (1.3 miles southwest of the Project Site). Given the temporary nature of construction activities, construction of the Project would not introduce a permanent population to an area which could result in an increase in the use of the existing library facilities constituting a need for library facilities or the expansion of existing facilities. Additionally, the use of library facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work location and are more likely to utilize library facilities near their places of residence. Thus, construction of the Project would not generate a demand for library facilities adequately accommodated by existing or planned facilities and services. As determined in the Initial Study, impacts on libraries during Project construction would be less than significant.

The new residential population generated by the Project could result in additional demand for library services provided by the Los Angeles Public Library (LAPL). However, while the new residents generated by the Project would be anticipated to visit the library facilities serving the Project Site, not all residents would use the library or travel to the same library. Additionally, the Project's residential units would be equipped to receive individual internet service, which provides information and research capabilities. The LAPL also provides access to a variety of web-based collections, reducing the demand for physical library locations. Also, while the Project's commercial component could result in a demand for library services, it is expected that employees of the commercial uses would prefer to use library facilities near their places of residence when not at the Project Site.

Furthermore, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, and business tax, etc.) that could be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the Project Site and its vicinity, as deemed appropriate. The Project's revenue to the General Fund would help offset the Project-related increase in demand for library services. Therefore, with the installation of internet service capabilities throughout the Project Site and the generation of revenues to the City's General Fund that could be applied toward the provision of new library facilities and related staffing, the Project would not result in the need for new or altered facilities, the construction of which would cause significant environmental impacts. As determined in the Initial Study, the impact on library facilities during the operation of the Project would be less than significant.

n. Recreation

As discussed above, parks and recreational facilities in the vicinity of the Project Site are primarily cooperated and maintained by RAP. The Project Site is currently developed, and no existing parks or recreational facilities are located on-site. RAP has identified the following parks in the Project vicinity: 18 neighborhood parks are located within a two-mile radius of the Project Site; 54 community parks located within a five-mile radius of the Project Site; and 15 regional parks located within a ten-mile radius of the Project Site.

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

requirements with respect to the Project's residential component. The Project would provide a total of 23,127 square feet of open space per LAMC requirements. Open space would consist of 300 square feet of private patios, 14,865 square feet of courtyard areas on the first and second floors, 2,252 square feet of two roof decks on the seventh floor and 5,710 square feet of various indoor amenities such as a club room, fitness room and lounge area.

Due to the amount, variety, and availability of the proposed open space and recreational amenities provided within the Project Site, it is anticipated that Project residents and employees would often utilize on-site open space and common areas to meet their recreational needs. Thus, while the Project's residents would be expected to utilize off-site public parks and recreational facilities to some degree, the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. In addition, pursuant to Section 12.33 of the LAMC, the Applicant would be required to comply with applicable park fee requirements which would be used to increase recreational opportunities for Project residents and improve existing parks. Thus, as determined in the Initial Study, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated, and impacts would be less than significant.

The Project would not require the construction or expansion of recreational facilities beyond the limits of the Project Site. Although the Project may place some additional demands on park facilities as new residents are introduced into the area, the increase in demand would be met through a combination of on-site amenities, existing parks in the Project vicinity, and payment of park fees, as discussed above. The Project's potential increased incremental demand upon recreational facilities would not in and of itself result in the construction of a new park, which might have an adverse physical effect on the environment. In addition, the recreational facilities included as part of the Project would not have a significant adverse effect of the environment. Therefore, as determined in the Initial Study, the Project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment, and impacts would be less than significant.

o. Transportation (Hazardous Geometric Design Features)

Primary vehicular access to the Project Site would be provided via a new driveway with an access gate along South Flower Drive that would provide ingress and egress into the Project’s at-grade residential and commercial parking garage. The Project’s access locations would comply with City standards and safety requirements, which mandate providing adequate sight lines, safe distances from potential conflicts, traversable sidewalks, crosswalks, and pedestrian movement controls. Therefore, as determined in the Initial Study, the Project would not substantially increase hazards due to a geometric design feature or incompatible use.

p. Utilities and Service Systems

(1) Water

Water during construction of the Project would be required for dust control, cleaning of equipment, excavation/export, removal, and re-compaction of soil. The estimated construction-period demand would be significantly less than the Project’s estimated operational demand, which

as described below, can be accommodated by the existing infrastructure. It can therefore be reasonably inferred that the existing water infrastructure would similarly meet the limited and temporary water demand associated with construction of the Project.

The Project would require new, on-site water distribution lines to serve the proposed building that would connect to the existing water mains. Construction impacts associated with the installation of water distribution lines would primarily involve trenching to place the water distribution lines below surface and would be limited to on-site water distribution. No off-site utility work would be conducted other than to connect the Project's utilities to main lines, which would be temporary in nature. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines, and LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. LADWP would also review and approve all appropriate connection requirements, pipe depths, and connection location(s). As such, construction activities would not encroach on public water utility distribution lines.

Therefore, as determined in the Initial Study, construction of the Project would not require the relocation or construction of new or expanded water facilities related to construction of the Project. Therefore, impacts would be less than significant.

The anticipated water demand for the Project is 37,984 gallons per day (gpd), compared to the existing water demand of 8,976 gpd, for a net water demand of 29,008 gpd. The Project would be serviced by a six-inch domestic and six-inch fire combination water meter. Fire service water would be piped into the proposed development from the meter. The Project would include automatic sprinklers on all floors of the proposed building. Further coordination with the LAFD would be conducted during Project Review to determine the fire flow requirements from adjacent hydrants and whether additional hydrants are necessary. An Information on Fire Flow Analysis (IFFA) application was submitted to the County of Los Angeles Fire Department, Fire Prevention Division on July 23, 2024, for the three fire hydrants in the vicinity of the Project Site. The IFFA reports that each of the fire hydrants have available fire flow of 1,500 gallons per minute at a pressure of 20 pounds per square inch (psi), with a combined flow of 4,500 gallons per minute at a pressure of 20 psi.

In addition, a Service Advisory Request (SAR) was submitted to LADWP for connection to the 16-inch water main on South Figueroa Street, to determine the water pressure of the water main lines and whether they would be able to accommodate a six-inch domestic and six-inch fire water combination meter. The 16-inch water main on South Figueroa Street was found to have sufficient pressure to handle the proposed combination meter with a pressure of 73 psi at 1400 gallons per minute. Therefore, there would be adequate capacity available to accommodate the required fire flows and domestic water demand generated by the Project, and the Project would not require the relocation or construction of new or expanded water facilities. As determined in the Initial Study, impacts would be less than significant.

According to the reliability data in the 2020 UWMP, the most recent plan available, for a single dry year, LADWP has sufficient supply to meet a total water demand of 746,000 in acre-feet (af) by the year 2045; LADWP has programs to reduce the demand to 565,800 af by 2045, a difference of 180,200 af. For the multi-dry year scenario, LADWP has sufficient supply to meet

total water demands ranging from 724,400 af to 746,000 af and reduce the demand to 565,700 af for each year in the multi-dry year scenario, resulting in a difference ranging from 158,700 af to 180,300 af. The Project's increase in water demand of 29,008 gpd, or 32.5 af per year, would fall within the available and projected water supplies reported in the 2020 UWMP for the City for 2045 and would constitute less than 0.01 percent of the City's projected 2045 water supply.

As there would be sufficient water supplies available to serve the Project, as determined in the Initial Study, impacts regarding water supply would be less than significant.

(2) Wastewater Treatment

The Los Angeles sewer system is comprised of three smaller systems: Hyperion Sanitary Sewer System, Terminal Island Water Reclamation Plant Sanitary Sewer System, and Regional Sanitary Sewer System.[25] The Project Site is located within the Hyperion Sewer System service area, which is operated and maintained by Los Angeles Sanitation and Environment (LASAN). The existing design capacity of the Hyperion Sewer System service area is approximately 550 million gallons per day (mgd), which consists of 450 mgd at the Hyperion Treatment Plant, 80 mgd at the Donald C. Tillman Water Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant.[26,27,28]

Wastewater would be generated throughout construction of the Project as a result of construction workers on-site. However, construction workers would utilize portable restrooms and handwashing stations, which would not contribute to wastewater flows to the City's wastewater system. Sewage from these facilities would be collected and hauled off-site and not discharged into the public sewer system serving the Project Site. Thus, wastewater generation resulting from Project construction activities is not anticipated to cause an increase in wastewater flows. Construction impacts associated with the installation of new wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and no off-site work associated with connections to the public sewage main would be conducted. Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete. Therefore, as determined in the Initial Study, the Project impact on wastewater associated with construction activities would be less than significant.

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[25] LASAN, Sewer System Management Plan, Hyperion Sanitary Sewer System, January 25, 2019. https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf, accessed August 29, 2024.

[26] LASAN, Treatment Process, https://sanitation.lacity.gov/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=7m1votmrt_224&_afrLoop=9881798326374624#!, accessed January 22, 2025.

[27] LASAN, Donald C. Tillman Water Reclamation Plant, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-dctwrp?_adf.ctrl-state=17jkelqawo_82&_afrLoop=21735430323215481#!, accessed August 29, 2024.

[28] LASAN, Los Angeles – Glendale Water Reclamation Plant, https://sanitation.lacity.gov/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-lagwrp?_afrLoop=9881480674780251&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=7m1votmrt_1#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D9881480674780251%26_afrWindowMode%3D0%26_adf.ctrl-state%3D7m1votmrt_5, accessed January 22, 2025.

A will-serve letter and Sewer Capacity Availability Request (SCAR) were obtained from the City, to determine if the existing public sewer systems have available and adequate capacity to convey sewage from the Project Site during operation. The SCAR approves 100 percent of the anticipated sewer flow generated by the Project, which is estimated to be 33,930 gpd with 50 percent of the flow discharging to the main line in South Flower Drive and 50 percent to the main line in South Figueroa Street.

The Hyperion Treatment Plant currently treats an average daily flow of approximately 260 mgd, resulting in an available treatment capacity of 190 mgd. The Project would account for approximately 0.02 percent of the available capacity of the Hyperion Treatment Plant.[29] Therefore, there would be adequate capacity available to accommodate the wastewater generated by the Project, and the Project would not require the relocation or construction of new or expanded wastewater treatment facilities and there would be adequate capacity to serve the Project. As determined in the Initial Study, impacts would be less than significant.

(3) Stormwater Drainage

The Project would be subject to the provisions of the City's LID Ordinance (Ordinance 183,833). The Project would be designed to maintain or reduce the current stormwater runoff by implementing measures to minimize flows leaving the Project Site, such as implementing a drywell system. Preliminary LID calculations result in a total required mitigation volume of 5,121 cubic feet. The Project's overflow would discharge to the storm drain system via under sidewalk drains which would be sized using the 50-year storm standard in accordance with City code requirements. Drainage structures and improvements within the City are subject to review and approval by the City's Department of Public Works and LADBS. As required by the Department of Public Works, all public storm facilities must be designed in conformity with the standards set forth by Los Angeles County. The Department of Public Works reviews and approves Municipal Separate Storm Sewer Systems plans prior to construction. Any proposed increases in discharge directly into County facilities, or proposed improvements of County-owned Municipal Separate Storm Sewer System facilities, such as catch basins and drainage lines, require approval from County Flood Control to ensure compliance with NPDES Permit requirements.

Environmental impacts associated with the development of the Project, including on-site drainage facilities, have been evaluated throughout this Initial Study. As concluded herein, all potentially significant impacts associated with development of the Project, including on-site stormwater drainage facilities, would be less than significant with the implementation of regulatory compliance requirements. Therefore, the Project would not require the relocation or construction of new or expanded stormwater facilities. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

(4) Electric Power

Electricity transmission to the Project Site is provided and maintained by LADWP through overhead lines running north and south roughly through the Project Site from West 38th Street to

[29] LASAN, Sewer System Management Plan Hyperion Sanitary Sewer System, January 25 2019, https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf, accessed December 12, 2023.

West 39th Street. Additionally, an existing four-foot-wide utility easement is located on-site for overhead power lines. A will-serve letter was received from LADWP on July 12, 2023, included in Appendix G, which notes that electric service is available and will be provided in accordance with the LADWP Rules and Regulations. The estimated power requirement for the Project is part of the total load growth forecast for the City and has been taken into account in the planned growth of the power system. Additionally, according to the Civil Engineering Report, the existing power lines running at the rear of the existing lots down the center of the block would need to be placed underground. Coordination with LADWP would be required to obtain permission to construct within the existing easement. During this off-site work, the Project would be required to coordinate with LADWP to ensure that pedestrian and traffic impacts during construction would be minimal, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency access. As determined in the Initial Study, impacts would be less than significant.

(5) Natural Gas

The Southern California Gas Company (SoCalGas) serves the City of Los Angeles. Record maps and a will-serve letter were received from SoCalGas. According to the Civil Engineering Report, existing natural gas facilities in the vicinity of the Project Site include a three-inch line in South Figueroa Street and a two-inch line in South Flower Drive. The Project would connect to these same lines and would not require the relocation or expansion of existing natural gas utility facilities. According to the will-serve letter from SoCalGas, the Project would be in accordance with SCG's policies and extension rules on file with the California Public Utilities Commission at the time contractual arrangements are made. As such, the Project would not require the relocation of natural gas facilities. As determined in the Initial Study, impacts would be less than significant.

(6) Telecommunications

Any new telecommunication connections would be constructed by the private utility service provider and would follow all appropriate regulatory requirements. New service point connections to provide telecommunications services to the new buildings would be provided in conformance with all applicable federal, state, and county requirements. The Project would not result in the relocation or construction of new off-site telecommunication facilities. As determined in the Initial Study, impacts would be less than significant.

(7) Solid Waste

Solid waste management in the City of Los Angeles involves both public and private refuse collection services, as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. Los Angeles Sanitation & Environment (LASAN) is responsible for developing strategies to manage solid waste generation and disposal in the City of Los Angeles. The LASAN collects solid waste generated primarily by single-family dwellings, small multi-family dwellings, and public facilities. Private hauling companies collect solid waste generated primarily from large multi-family residential, commercial, and industrial properties. The City of Los Angeles does not own or operate any landfill facilities, and the majority of its solid waste is disposed of at County landfills.

In 2021, the total amount of solid waste disposed of at in-county Class III landfills, permitted inert landfills, transformation facilities, and out-of-County landfills was approximately 11.5 million tons.[30] The remaining permitted disposal capacity for the County's Class III (nonhazardous solid waste) landfills is estimated at approximately 187.9 million tons as of July 2021, the most recent data available.[31] As of July 2021, waste from the City of Los Angeles was disposed of primarily at the Sunshine Canyon and Chiquita landfill sites. Of the 187.9 million tons of remaining capacity within the County, 52.22 million tons, or approximately 28 percent, was located at Sunshine Canyon landfill, which has a remaining life of 16 years; and 51.63 million tons, or approximately 28 percent, was located at the Chiquita Canyon landfill. In addition to in-County landfills, out-of-County disposal facilities are also available to the City of Los Angeles. However, effective January 1, 2025, Chiquita Canyon Landfill closed active waste disposal operations. The County plans to conduct a comprehensive assessment of the closure's implications, including its effect on waste disposal operations.[32] Nevertheless, given that the total remaining permitted disposal capacity for the County's landfills without Chiquita Canyon landfill would be approximately 136.3 million tons and that out-of-County disposal facilities also continue to have availability to accept solid waste, the remaining County landfills have sufficient capacity to accommodate solid waste even with the closure of the Chiquita Canyon Landfill.

As discussed in County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2021 Annual Report, a shortfall in solid waste disposal capacity within the County is not anticipated to occur within the next 15 years under current conditions. The County anticipates that future disposal needs over the next 15 years can be adequately met through increased waste reduction and diversion efforts, development of alternative technologies, export of waste to out-of-County facilities, the Waste-by-Rail system to Mesquite Regional Landfill in Imperial County, and if found to be environmentally sound and technically feasible, the expansion of in-County Class III landfill capacity.[33]

The City's Solid Waste Integrated Resources Plan (SWIRP), most commonly known as the City's Zero Waste Plan, provides a long-term plan through 2030 for the City of Los Angeles's solid waste programs, policies, and environmental infrastructure. The SWIRP aims for the City to achieve a goal of 90 percent diversion by 2025. This targeted diversion rate would be implemented through an enhancement of existing policies and programs such as implementing additional downstream programs (e.g., adding textiles to the blue bin recycling program; adding food scraps to the green bin recycling program; and requiring private solid waste collection services to provide access to multifamily and commercial customers); implementation of mandatory participation programs for residential, government, commercial, industrial, and institutional users; requiring transfer stations and landfills to provide resource recovery centers;

[30] County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2021 Annual Report, December 2022, Appendix E-2. https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=17450&hp=yes&type=PDF, accessed September 26, 2024.

[31] County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2021 Annual Report, December 2022, Appendix E-2. https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=17450&hp=yes&type=PDF, accessed September 26, 2024.

[32] KTLA, Castaic landfill to close after years of odor complaints, Southern California landfill to close after years of odor complaints, accessed January 22, 2025.

[33] County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2021 Annual Report, December 2022, https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=17450&hp=yes&type=PDF, accessed September 26, 2024.

and increased diversion requirements at construction and demolition (C&D) facilities pursuant to new policies and programs, and the development of future recycling facilities.[34]

During construction, the Project is estimated to generate approximately 1,951 tons of solid waste per day without diversion, and 488 tons of solid waste per day after diversion. Solid waste generated by construction and operation of the Project could be accommodated by the County's available regional landfills. Furthermore, the Project's waste generated during construction would be subject to State and local recycling and waste diversion strategies and policies including the City's SWIRP goal of achieving a 90 percent solid waste diversion rate by 2025. Project construction would include the demolition of the existing buildings and vacant lot on-site. Demolition waste would be conveyed pursuant to the City's Waste Hauler Permit Program (Ordinance 181519), effective January 1, 2011. Under this Ordinance, all private waste haulers collecting solid waste within the City, including C&D waste, are required to obtain Assembly Bill (AB) 939 Compliance Permits and to transport C&D waste to City certified C&D processing facilities. These facilities process received materials for reuse and have recycling rates that vary from 70 percent to 84 percent.

For Project operations, the estimated solid waste generation for the Project is based on the solid waste generation rates per the California Department of Resources Recycling and Recovery (CalRecycle's) Estimated Solid Waste Generation Rates. The anticipated Project demand is 0.924 tons per day (tpd), compared to the existing demand of 0.219 tpd, resulting in a net increase in demand of 0.705 tpd. The amount of solid waste generated by the Project is within the available capacities of area landfills, would not impair the attainment of solid waste reduction goals, and as determined in the Initial Study, the Project's impacts to regional landfill capacity would be less than significant. The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.[35] The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling, as well as the LASAN Blue Bin Recycling Program.[36] In addition, pursuant to the requirements of 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, and pursuant to LAMC Sections 66.32.1 through 66.32.5 (the City's Construction and Demolition Waste Recycling Ordinance No. 181,519), the Project's general contractor and/or subcontractors would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility.[37] Since the Project

[34] LASAN, Solid Waste Integrated Resources Plan, https://sanitation.lacity.gov/san/sandocview?docname=cnt012522, accessed January 22, 2025.

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

[36] LASAN, Blue Bin Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-rybb?_afrLoop=529655163497719 0&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=bghkbdldv_78#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D529655163497719 0%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dbghkbdldv_82, accessed December 23, 2024.

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

would comply with federal, State, and local statutes and regulations related to solid waste, as determined in the Initial Study, impacts would be less than significant.

q. Wildfire

The Project Site is located in a highly developed and urbanized area that is not susceptible to wildfires. The Project Site is not located within a City-designed Very High Fire Hazard Severity Zone, nor is it located within a City-designated fire buffer zone.[38,39] Additionally, according to the CalFire Hazard Severity Zone Viewer, the Project Site is not located within a Very High Fire Hazard Severity Zone (VHFHSZ) in either the State Responsibility Area (SRA) or a Local Responsibility Area (LRA).[40] The nearest VHFHSZ in a SRA is located 14 miles east of the Project Site. Therefore, the Project Site is not located in or near SRAs or lands classified as VHFHSZs. As determined in the Initial Study, no impacts regarding wildfire risks or related post-fire conditions would occur.

[38] City of Los Angeles, ZIMAS, Parcel Profile Report for APN 5037-031-015, 5037 031-016, 5037 031-001, 5037-031-002, 5037-031-003, 5037-031-004, 5037 031-005, 5037-031-006, and 5037-031-007), https://zimas.lacity.org/, accessed July 25, 2024.

[39] City of Los Angeles. City of Los Angeles General Plan Safety Element p. 27. https://planning.lacity.gov/odocument/bf51ae04-1c7b-4931-9a29-d46209998b89/Safety_Element.pdf, accessed July 25, 2024.

[40] CALFIRE. Fire Hazard Severity Zone Viewer. https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/, accessed July 25, 2024.