6.0 OTHER CEQA CONSIDERATIONS

6.1. SIGNIFICANT UNAVOIDABLE IMPACTS

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

Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance.

Based on the analysis in Section 4.0 (Environmental Impact Analysis) of this Draft EIR, implementation of the Project would result in significant unavoidable environmental impacts relative to: Air Quality (construction daily emissions for NOx, and overlapping construction and operation phases for NOx and ROG); Noise (construction noise); and Transportation (10 peak hour impacts at seven intersections at buildout) and cumulative construction traffic.

AIR QUALITY

Emissions associated with the Project would exceed the SCAQMD’s thresholds of significance for NOx during overlapping construction on Site 1 and Site 3, and NOx and ROG during construction and operation overlapping phases and would be significant and unavoidable, as discussed in Section 4.2 (Air Quality) of this Draft EIR.

NOISE

Construction noise impacts would be significant and unavoidable at four locations, which include Sensitive Receptor 2, the school/religious use located east of the Shatto Place parking structure; and Sensitive Receptors 12, 14 and 15, which are residential, religious, and residential uses, respectively, located in the vicinity of Site 3.

TRAFFIC, TRANSPORTATION

Cumulative construction traffic impacts would be significant and unavoidable due to the potential for concurrent construction of the related projects in the vicinity of the Project. The Project’s contribution to this significant cumulative impact would be cumulatively considerable.

Significant and unavoidable impacts would remain at the following intersections (numbers refer to intersection numbers in Table 4.14-1 in Section 4.14, Transportation and Traffic, of this Draft EIR):

**Existing with Project Phases I and II Conditions**
24. Vermont Avenue & Wilshire Boulevard (PM Peak)

**Interim Year 2021 with Project Phase I**
6. Vermont Avenue & Beverly Boulevard (PM Peak)
24. Vermont Avenue & Wilshire Boulevard (PM Peak)
6.1 Significant Unavoidable Impacts

Buildout Year 2023 with Project Phases I and II

6. Vermont Avenue & Beverly Boulevard (PM Peak)
10. Vermont Avenue & 3rd Street (PM Peak)
18. Vermont Avenue & 6th Street (AM and PM Peak)
24. Vermont Avenue & Wilshire Boulevard (AM and PM Peak)
30. Vermont Avenue & Olympic Boulevard (AM and PM Peak)
33. Vermont Avenue & Washington Boulevard (PM Peak)
35. Vermont Avenue & I-10 Eastbound Ramps (PM Peak)
6.0 OTHER CEQA CONSIDERATIONS

6.2. REASONS WHY THE PROJECT IS BEING PROPOSED, NOTWITHSTANDING SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) goes on to say:

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 noted above, the Project would have significant unavoidable impacts in the areas of construction air quality, construction noise, operational traffic, and cumulative construction traffic. In spite of these impacts, the Project is being proposed because it would:

- Provide a mix of uses that maximizes building density at locations served by public transit and locates residential uses in areas that reduce automobile dependency, by replacing obsolete County facilities with new state-of-the art office facilities and infrastructure that will meet the current and future needs of County Departments located within or near the Vermont Corridor, and by providing residential and retail uses to serve the local community, in a transit priority area.

- Promote revitalization of the currently underutilized project sites, by expediting the elimination of blight and improving the visual character of the Project area through the redevelopment of underutilized sites.

- Provide needed housing near public transit, by constructing high density residential dwelling units to serve a range of potential tenants, and developing new housing stock at infill locations close to commercial and office uses.

- Provide needed deed restricted senior affordable housing units in the Vermont Corridor.

- Promote fiscal and community benefits, economic development, and job creation, by creating construction jobs, consolidating DMH and WDACS employees in the Vermont Corridor, providing economic benefit to the County, and providing community benefits through construction of a community recreation center and deed restricted senior affordable housing.

- Create an environmentally sensitive development, by incorporating sustainable and green building design and construction that reduces waste, manages water use efficiently and conserves energy, and by providing employment, housing, and shopping opportunities within easy access of established public transit.
Section 15126.2(c) of the State CEQA Guidelines states that the “uses 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.” Section 15126.2(c) further states “irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

The types and level of development associated with the Project would consume limited, slowly renewable, and non-renewable resources. 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, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the Project Site.

Construction of the Project would require consumption of resources that are not replenishable or that 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), petrochemical construction materials (e.g., plastics), and water. Fossil fuels, such as gasoline and oil, would also be consumed in the use of construction vehicles and equipment. The consumption of these resources would be spread out through the construction period.

The commitment of resources required for the type and level of proposed development would limit the availability of these resources for future generations for other uses during the operation of the Project. However, this resource consumption would be consistent with growth and anticipated change in Los Angeles County and the City of Los Angeles. In addition, the Project would include the adaptive reuse of the existing County office building located at Vermont Avenue and 6th Street, which would involve the consumption of fewer new resources than full demolition of the existing building and construction of a new building at this location.
6.0 OTHER CEQA CONSIDERATIONS

6.4. GROWTH INDUCING IMPACTS

State CEQA Guidelines Section 15126.2(d) requires a discussion of the ways in which a project could induce growth. This includes ways in which a project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. State CEQA Guidelines Section 12126.2(d) states:

*Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.*

The Project is being undertaken to generate substantial economic benefit to the area by eliminating blight, creating construction jobs for local residents, as well as providing growth and expansion opportunities for local and small businesses. The Vermont Corridor Project would include the updated re-development and occupancy of three County-owned properties located in the Vermont Corridor, which is home to over a half million square feet of County-owned office space, and over a half million square feet of County-leased office space. County-owned facilities, built between 1938 and 1963, have contributed to blight in the surrounding community due to the age of the buildings. To promote improved efficiency, reverse blight in the area, and promote redevelopment of the County-owned properties and surrounding areas, the County’s intends to consolidate these departments’ locations within new office facilities, and relocate employees accordingly. Further, the aged facilities occupy prominent parcels that offer potential opportunities for economic revitalization through their redevelopment that would also provide public benefits and aesthetic enhancement for the surrounding community.

Site 1 is currently occupied by a two-story abandoned structure with roof parking that has been identified as structurally deficient, a two-story office building occupied by County staff, open parking areas, and carport in the north parking area, and an existing parking structure at 523 Shatto Place that is connected to the site. Proposed development on Site 1 would involve removal of the existing office building, vacant office building, surface parking lots, and parking structure, and construction of a new County office building containing 471,000 square feet of office use over a 390,000-square foot parking structure containing 965 spaces, and 10,000 square feet of ground floor retail. In addition, a new parking structure would be constructed on the site of the existing 7-story parking structure on Shatto Place.

Site 2 is currently occupied by two County office buildings and a parking structure. Proposed development on Site 2 would involve reuse and conversion of the existing 154,793-square foot, 12-story DMH building into a maximum of 172 residential units (82 studio, 46 one-bedroom, 44 two-bedroom), 4,100 square feet of ground floor retail, 1,375 square feet of ancillary space (office, common area, etc.), and an
approximately 7,500 square foot roof deck amenity. Upgrade to existing steel framing and installation of new HVAC, and life/safety systems would be included in the reuse of the existing DMH building, as well as new exterior building facades. The existing building height of 173.5 feet (including the elevator machine room) would not change under the Project. In addition, the development of Site 2 would involve removal of the existing four-story, approximately 52,000 square foot, WDACS office building and two-story parking structure, and construction of a new 116,324 square foot, five-level parking structure (3.5 levels above grade and 1.5 levels below grade). A future option for the development of Site 2 would include construction of a new 66,935 square foot, mixed-use building above the parking structure, containing five residential levels and 74 units (28 studio, 38 one-bedroom, and 8 two-bedroom), and 2,250 square feet of ancillary space. In addition, 3,400 square feet of retail uses would be provided at the ground level of the new mixed-use building on 6th Street. The parking structure would provide 263 auto parking spaces and 290 bicycle storage spaces (30 short-term and 260 long-term) to serve the residential units (new and reused/converted), and the retail uses on Site 2. The new mixed-use building would be approximately 95 feet from the highest adjacent grade to the top of the parapet (105 feet to top of elevator machine room).

Site 3 is currently occupied by a County office building. Proposed development on Site 3 would involve removal of the existing building, and construction of a new 80,837 square foot, six-story, one hundred percent senior affordable housing project containing 72 units, and an approximately 13,200 square foot community recreation center, over a three-story, 51,591 square foot underground parking structure.

The Project would consolidate up to 2,063 existing County employees on Site 1, and would be designed to accommodate future growth, to a maximum of 2,166 employees, between 2021 and 2023. The net increase in employment on Sites 1 and 2 as a result of the Project would be 907 employees by 2023. The new Project employees on Sites 1 and 2 would be within the SCAG employment growth forecasts, representing approximately 0.19 percent of the citywide total growth for the period of 2020 to 2040 as discussed in Section 4.11 (Population, Housing, and Employment) of this Draft EIR. Site 3 uses would generate approximately 46 employees, which would result in a net decrease of approximately 66 employees on the Site. The location of employment in this area of the City that would occur under the Project would be consistent with the regional growth management policies discussed in detail in Section 4.9 (Land Use and Planning). This increased employee population of the Project Sites would patronize local businesses and services in the area, and would foster economic growth. The potential concentration of employment in this area of the City that would occur under the Project would be consistent with the regional growth management policies discussed in detail in Section 4.9 (Land Use and Planning). These policies promote development activity in existing developed areas, especially areas near existing transit and transportation infrastructure, such as the Project Sites, which are located within walking distance of the Metro Rail Red/Purple Line Wilshire/Vermont Station. The Project would foster economic growth and revitalize an area by adding businesses to the Project Site. The employees associated with the Project could, in turn, patronize existing local businesses and services in the area. The Wilshire Community Plan policies also promote an arrangement of land use, circulation, and services which encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the community. The projected employment growth would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels, and that would result in an adverse physical change in the environment, or introduce unplanned infrastructure (see Section 4.11 [Population, Housing, and Employment]). Therefore, projected employment growth associated with the Project would not generate adverse impacts.
6.4 Growth Inducing Impacts

The Project includes the development of up to 318 new housing units, including 72 senior affordable housing units. The additional units proposed to be developed on Sites 2 and 3 would be within SCAG’s anticipated growth forecast, representing approximately 0.13 percent of the total citywide growth for the period of 2020 to 2040. Therefore, the residential development associated with the Project would be within the projections for housing unit growth Citywide.

In 2012, SCAG estimates that the City of Los Angeles had a total population of 3,845,500 persons. According to SCAG, the City’s population is expected to increase by 171,500 between 2012 and 2020, with additional growth of 592,400 persons between 2020 and 2040. The construction of additional residential dwelling units on the Project Site would be expected to accommodate up to 799 permanent residents by 2023. The addition of these new residents would be within the SCAG population growth forecasts, representing approximately 0.13 percent of the Citywide total growth for the period of 2020 to 2040. Since the population growth associated with Site 2 would be within the projected growth for the City of Los Angeles, impacts related to population growth would be less than significant. Therefore, the population growth associated with the residential development associated with the Project would be within the projections for population growth Citywide. This increased residential population would patronize local businesses and services in the area, and would foster economic growth. The potential concentration of housing and population in this area of the City that would occur under the Project would be consistent with the regional growth management policies discussed in detail in Section 4.9 (Land Use and Planning). These policies promote development activity in existing developed areas, especially areas near existing transit and transportation infrastructure, such as the Project Sites, which are located within walking distance of the Metro Rail Red/Purple Line Wilshire/Vermont Station. The Wilshire Community Plan policies also promote an arrangement of land use, circulation, and services which encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the community. The projected population growth would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels, and that would result in an adverse physical change in the environment, or introduce unplanned infrastructure (see Section 4.11 [Population, Housing, and Employment]). Therefore, projected population growth associated with the Project not generate adverse impacts.
6.0 OTHER CEQA CONSIDERATIONS

6.5. EFFECTS NOT FOUND TO BE SIGNIFICANT

CEQA Guidelines Section 15128 requires an EIR to 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. Pursuant to Section 15128, the lead agency determined that the proposed project would not result in potentially significant impacts to the following environmental topics included in CEQA Guidelines Appendix G:

- Aesthetics (scenic vistas, views from trails, scenic resources within a State scenic highway)
- Agriculture and Forest Resources (all subtopics)
- Air Quality (objectionable odors)
- Biological Resources (all subtopics)
- Geology and Soils (surface rupture along known faults, landslides, erosion, expansive soil, septic tanks/wastewater treatment, conflicts with hillside management area ordinance)
- Hazards and Hazardous Materials (routine use of hazardous materials, airports, interference with emergency response, fire hazards)
- Hydrology and Water Quality (mosquito habitat, pollutant discharge into areas of Special Biological Significance, wastewater treatment, 100-Year flooding, seiche/tsunami/mudflow)
- Land Use (division of a community)
- Mineral Resources (all subtopics)
- Noise (proximity to airports)
- Population and Housing (displacement of housing, displacement of people)
- Recreation (regional open space connectivity)
- Transportation and Traffic (air traffic patterns)

An analysis prepared pursuant to Guidelines Section 15128 for these environmental topics is provided below.

AESTHETICS (SCENIC VISTAS, VIEWS FROM TRAILS, SCENIC RESOURCES WITHIN A STATE SCENIC HIGHWAY)

Proposed development of Sites 1, 2 and 3 would represent residential, mixed-use residential, or employment center projects on infill sites within a transit priority area, and, as such, the Project’s aesthetic and parking impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. The following analyses regarding aesthetics, are provided for informational purposes.

The Project Sites are located in an urbanized setting and are surrounded by commercial, institutional, parking, and multi-family residential uses. There are no scenic vistas or prominent topographical features that would provide scenic vistas nor are there scenic corridors or expansive views available at or in the vicinity of the Project Sites. Therefore, impacts to scenic vistas would be less than significant.
There are no regional riding or hiking trails within view of the Project Sites or area surrounding the Project Sites. According to the City of Los Angeles Department of Recreation and Parks, the nearest City-designated equestrian riding trails to the Project Sites are in Griffith Park, approximately four miles north of the Project Sites. According to the County of Los Angeles Department of Parks and Recreation, the nearest County-designated equestrian riding trails to the Project Sites are in Whittier Narrows Recreation Area, located approximately 17 miles east of the Project Sites, and Eaton Canyon Park and Nature Center, located approximately 17 miles northeast of the Project Sites.\(^1\) The nearest designated mountain biking trails to the Project Sites are located at Colonel H. Leon Washington Park, approximately 10 miles southeast of the Project Sites.\(^2\) The nearest hiking trails to the Project Sites are the Ferndell trail to Griffith Park, approximately four miles north of the Project Sites, and Runyon Park trail from Wattles Garden Park, approximately six miles northwest of the Project Sites.\(^3\) The Project Sites would not obstruct views from these trails. Accordingly, impacts to views from trails would be less than significant.

The nearest designated scenic highway to the Project Sites is Highland Avenue, north of Wilshire Boulevard; Highland Avenue is approximately three miles west of the Project Sites.\(^4\) The Project Sites are not located along or within the scenic vistas or viewsheds of this scenic highway. Therefore, the Project would not damage and/or remove any scenic resources within a State or City designated scenic highway, and no impact would occur.

**AGRICULTURE AND FOREST RESOURCES**

The Project Sites are all currently developed with active and abandoned buildings and parking. No Farmland, agricultural uses, or related operations are present within the Project Sites or surrounding area. The Project Sites are not zoned for agricultural uses, enrolled under the Williamson Act, located within a designated Agricultural Opportunity Area, nor included in the Farmland Mapping and Monitoring Program of the California Resources Agency. Additionally, the Project Sites and the surrounding area are not zoned for forest land, timberland, or zoned for Timberland Production. Accordingly, the Project would not directly or indirectly cause the conversion of Farmland to non-agricultural use or the conversion of forest land to non-forest use. Therefore, the Project would not result in any impacts related to agriculture and forest resources.

**AIR QUALITY (OBJECTIONABLE ODORS)**

Potential sources of odors during construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the Project Sites. The Project would utilize typical construction techniques, and any odors would be typical of urban construction activity. Additionally, any odors would be temporary, and construction activity associated

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with the Project would be required to comply with SCAQMD Rule 402, which prohibits discharge of air contaminants that cause nuisance odors. Accordingly, Project construction would not cause an odor nuisance, and odor impacts are anticipated to be less than significant.

According to the SCAQMD CEQA Air Quality Handbook, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The Project involves the construction and operation of office space, residential units, commercial/retail uses, and associated parking which are not typically associated with odor complaints. Restaurants that would be included in the Project would be subject to SCAQMD Rule 402, Nuisance, as it applies to the generation of odors. As the Project involves no elements related to odor-causing uses listed or similar to those identified in the SCAQMD CEQA Air Quality Handbook, no objectionable odors are anticipated. Therefore, the Project’s impacts associated with objectionable odors would be less than significant.

**BIOLOGICAL RESOURCES (TREES AND BIOLOGICAL RESOURCES)**

The Project Sites are entirely developed and/or paved.

**Trees**

Tree reports were prepared for Sites 1, 2 and 3, and are contained in Appendices 6.5-1, 6.5-2, and 6.5-3, respectively to this Draft EIR.

*Site 1*

Site 1 is under the jurisdiction of the County of Los Angeles and guided by the Oak Tree Ordinance, County Code Section 22.56.2060, which the County has adopted to recognize the aesthetic, environmental, ecological, economic benefits and historical legacy that Oak trees provide the county. The tree report for Site 1 found that there are no trees on this Site that would be protected under the Los Angeles County Oak Tree Ordinance.

The Project includes sidewalk improvements and construction that will significantly impact seven City of Los Angeles Street Trees. Four of these trees are Indian laurel fig trees (*Ficus micrrocarpa nitida*) located on Vermont Avenue. The three other trees are carrotwood trees (*Cupaniopsis anacardioides*) located on Shatto Place. These trees would be removed and replaced in accordance with existing regulations of the City of Los Angeles Urban Forestry Division. The seven street trees will be replaced at a 2:1 ratio to the satisfaction of the City of Los Angeles Urban Forestry Division, for a total of fourteen (14) new street trees. Impacts would be less than significant.

Non-Protected Significant Trees on Site 1 consist of existing trees on the Site with a diameter at breast height (DBH) of 8 inches (8”) or greater. Ten Non-Protected Significant Trees will be impacted by Site 1 construction. The trees are all Canary pines (*Pinus canariensis*) located in a row near the sidewalk by Shatto Place. These trees would be removed and replaced upon the completion of construction.

Existing trees on Site 1 do not contain any habitat capable of sustaining any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.
Site 2

Site 2 is under the jurisdiction of the City of Los Angeles and guided by the Native Tree Protection Ordinance No. 177,404. Protected Trees are defined by this ordinance as Oaks (*Quercus* sp) indigenous to California but excluding the scrub oak (*Quercus dumosa*); Southern California black walnut (*Juglans californica* var. *californica*); Western sycamore (*Platanus racemosa*) and California bay laurel (*Umbellularia californica*) trees with a DBH of four inches (4") or greater. The tree report for Site 2 found that there are no trees on this Site that would be protected under the City of Los Angeles Native Tree Protection Ordinance.

The Project includes sidewalk improvements and construction that will significantly impact four City of Los Angeles Street Trees. These trees are Indian laurel fig trees (*Ficus mirrocarpa nitida*) located on Vermont Avenue and 6th Street. These trees would be removed and replaced in accordance with existing regulations of the City of Los Angeles Urban Forestry Division. The four street trees will be replaced at a 2:1 ratio to the satisfaction of the City of Los Angeles Urban Forestry Division, for a total of eight new street trees. Impacts would be less than significant.

Non-Protected Significant Trees on Site 1 consist of existing trees on the site with a diameter at breast height (DBH) of 8 inches (8") or greater. Ten Non-Protected Significant Trees will be impacted by Site 2 construction. The trees are all Canary pines (*Pinus canariensis*) located in a row near the sidewalk by Shatto Place. These trees would be removed and replaced upon the completion of the project.

Existing trees on Site 2 do not contain any habitat capable of sustaining any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

Site 3

Site 3 is under the jurisdiction of the County of Los Angeles and guided by the Oak Tree Ordinance, County Code Section 22.56.2060, which the County has adopted to recognize the aesthetic, environmental, ecological, economic benefits and historical legacy that Oak trees provide the county. The tree report for Site 3 found that there are no trees on this Site that would be protected under the Los Angeles County Oak Tree Ordinance.

The tree report for Site 3 did not identify any other trees on the Site.

Biological Resources

In addition, the Project Sites and the surrounding areas are highly urbanized with no open spaces, water bodies, or stream courses that would facilitate movement of migratory fish or wildlife. Thus, no suitable habitats exist on the Project Sites to support these sensitive natural communities (such as riparian habitat, coastal sage scrub, oak woodlands, unique native trees, or non-jurisdictional wetlands). Similarly, the Project would not interfere with or impede the movement or migration of any native resident or wildlife species.

The Project Sites are not located within any Wildflower Reserve Areas, Significant Ecological Areas, or Sensitive Environmental Resource Areas, or areas subject to the Los Angeles County Oak Tree Ordinance. In addition, there is no adopted State, regional, or local habitat conservation plan that is applicable to the Project Sites or the surrounding areas. Given the above, the Project would not impact any sensitive plant or wildlife species, either directly or through habitat modification, and it would not conflict with any local
policies or ordinances protecting biological resources. Additionally, there are no federally or State protected wetlands, vernal pools, coastal wetlands, drainages, or waters of the U.S. located on or near the Project Sites. Accordingly, the proposed project would not have any impact, either, directly or through removal, filling, hydrological interruption, or other means, on these sensitive natural resources.

While trees on the Sites 1 and 2 could potentially contain bird nests, the birds would be substantially accustomed to urban activity. The Project would be required to comply with the federal Migratory Bird Treaty Act of 1918 (50 Code of Federal Regulation Section 10.13), and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, as part of regulatory compliance for Sites 1 and 2 (there are no trees Site 3).

Overall, the Project would not be anticipated to significantly impact biological resources.

GEOLOGY AND SOILS (SURFACE RUPTURE ALONG KNOWN FAULTS, LANDSLIDES, EROSION, EXPANSIVE SOIL, SEPTIC TANKS/WASTEWATER TREATMENT, CONFLICTS WITH HILLSIDE MANAGEMENT AREA ORDINANCE)

All aspects of seismic-related hazards, other geotechnical hazards, and erosion and sedimentation issues are regulated by Los Angeles County and/or the State of California. Development at the Project Sites would incorporate the recommendations of the geotechnical assessments as a Project Design Features. In addition, adherence to design and construction standards, as required by State and County regulations and codes, would ensure maximum practicable protection for users of the buildings such that they can withstand acceptable risk.

Surface Fault Rupture

The Project Sites are not located within an Alquist-Priolo Earthquake Fault Zone, nor are they located within a Preliminary Fault Rupture Study Area as designated by the City of Los Angeles. No known active or potentially active faults underlie any of the Project Sites and the nearest fault to Project Sites is the Hollywood Fault, approximately three miles to the northwest. As such, significant impacts related to surface rupture of faults are not anticipated at the Project Sites.

Landslides

The Project Sites and vicinity are relatively flat and not located within a “Landslide Inventory and Hillside Areas” or within an area identified as having a potential for seismic slope instability. There are no known landslides at any of the Project Sites, nor are the Project Sites in the path of any known or potential

\[5\] Geotechnologies, Inc., Geotechnical Assessment, Site 1: Proposed Office Building and Parking Structure, 510, 526, 532 South Vermont Avenue and 523 Shatto Place, Los Angeles, California, November 2016, revised May, 2017; Geotechnical Assessment Site 2: Proposed Adaptive Reuse Project and Mixed-Use Structure 540, 542 and 550 South Vermont Avenue and 3175 West 6th Street, Los Angeles, California, November, 2016, revised May, 2017; and Geotechnical Assessment Site 3: Proposed Affordable Housing Development 427 and 433 South Vermont Avenue, Los Angeles, California, November, 2016, revised May, 2017. See Appendices 4.5-1, 4.5-2 and 4.5-3 to this Draft EIR.

landsides. As such, the probability of seismically-induced landslides is low and no impacts would occur.

Erosion

The Project Sites are currently improved with office buildings and associated parking and the area surrounding the Project Sites is completely developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by development at any of the Project Sites. During construction, grading and excavation would expose soils to potential erosion for a limited time, however, due to the temporary nature of the soil exposure during the grading and excavation processes, no substantial erosion would occur. In addition, during this period, construction activities would be required to prevent the transport of sediments from the Project Sites by stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs). These BMPs would be detailed in the required Stormwater Pollution Prevention Program (SWPPP), which must be approved by the County on Sites 1 and 3, and by the City on Site 2, and be in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations.

Expansive Soil

Materials underlying the Project Sites are anticipated to be deep fill materials, alluvial soils, and bedrock of the Puente Formation. The alluvial soils underlying the fill generally consists of mixtures of sands, silty sands, and silty clays. The alluvium is typically medium dense to very dense, or stiff, and well-consolidated with expansion characters that range from low to moderate. Development to the depth required for the proposed underground parking structures at the Sites would require the removal of the existing fill and foundation supports would extend into competent soils or bedrock beneath the Sites. As such, potentially expansive alluvial soils would be removed during excavation. The geotechnical reports prepared for the Project Sites conclude that the Sites can be feasibly developed from a geotechnical engineering standpoint.

Septic Tanks/Wastewater Treatment,

The Project Sites are located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance, and treatment system operated by the City. Project development at all three Project Sites would connect to the existing wastewater system. No septic tanks or alternative disposal systems are necessary, nor are they proposed.

Hillside Management Area Ordinances

Sites 1 and 3 are not located within a County-designated “Hillside Management Area,” and Site 2 is not located within a City-designated hillside area. Therefore, no conflict with hillside development

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7 City of Los Angeles Department of City Planning, General Plan, Safety Element, Exhibit C, Landslide Inventory & Hillside Areas in the City of Los Angeles, June 1994.
8 Geotechnologies Inc., Geotechnical Assessments, op.cit.
9 Geotechnologies Inc., Geotechnical Assessments, op.cit.
10 Los Angeles County Department of Regional Planning, General Plan, Conservation and Natural Resources Element, Figure 9.8, Hillside Management Areas and Ridgeline Management Map, 2001.
regulations would occur.

HAZARDS AND HAZARDOUS MATERIALS (ROUTINE USE OF HAZARDOUS MATERIALS, AIRPORTS, INTERFERENCE WITH EMERGENCY RESPONSE, FIRE HAZARDS)

The types and amounts of hazardous materials that would be used in connection with development at the three Project Sites would be typical of those used in other office, residential, and commercial developments (e.g., cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products). Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers’ instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations.

The Project Sites are not located within the vicinity of an airport or a private airstrip. The Project construction and operation would not result in airport- or airstrip-related safety hazards for people residing or working in the area. Therefore, the Project would have no impact related to airport or airstrip activity.

The Project Sites are not located along a County-identified disaster route. The Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access or travel upon public rights-of-way. No full road closures are anticipated during construction of the Project, and none of the surrounding roadways would be impeded. Access for emergency service providers and evacuation routes would be maintained during construction. Furthermore, during Project construction, the Project Applicant would be required to prepare a Traffic/Construction Management Plan, which would involve close coordination with applicable agencies, including, but not limited to, the City of Los Angeles Department of Transportation, Fire Department, and Police Department, to ensure that emergency response or evacuation is not interrupted or affected by the Project during construction or operation. Therefore, the Project would not be expected to impact emergency response or emergency evacuation plans.

The Project Sites are not located within a Very High Fire Hazard Severity Zone or any other high fire hazard area. The Sites are located in an area that has established water infrastructure and no uses that would constitute a potentially dangerous fire hazard (e.g., petroleum production, chemical plant, industrial uses).

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14 Transportation Study for the Vermont Corridor Development Plan, Gibson Transportation Consulting, June, 2017. See Appendix 4.14-1 to this Draft EIR.
15 Ibid.
are proposed. Accordingly, the Project is not anticipated to result in significant impacts related to fire hazards.

HYDROLOGY AND WATER QUALITY (MOSQUITO HABITAT, POLLUTANT DISCHARGE INTO AREAS OF SPECIAL BIOLOGICAL SIGNIFICANCE, WASTEWATER TREATMENT, 100-YEAR FLOODING, SEICHE/TsunAMI/MUDFLOW)

The Project would not include any water features17 or create conditions in which standing water could accumulate that could provide habitat for mosquitoes and other vectors that transmit diseases or result in increased pesticide use. Therefore, no impact related to the vector-transmitted diseases would occur.

The Project Sites are located in a heavily urbanized area of the City of Los Angeles. The Project Sites and their vicinity are not situated in County-designated Significant Ecological Areas (i.e., Areas of Special Biological Significance)18. Therefore, the Project would not result in any point or nonpoint source pollutant that would directly discharge into such designated areas.

The Project does not include the use of on-site wastewater treatment systems. Therefore, the Project would have no impact related to the use of such systems.

The Project Sites are not located within a City designated Flood Hazard Zone19, or within a flood hazard area as defined by the Federal Emergency Management Agency (FEMA).20 In addition, the Project Sites are located at least 12 miles from the Pacific Ocean and are not in the vicinity of any other major water bodies that would be susceptible to seiche or open space where mudflows could occur. As such, the Project would not be exposed to 100-Year floods, tsunamis, seiche, or mudflows.

LAND USE (DIVISION OF A COMMUNITY)

A physical division of an established community is caused by an impediment to through travel or a physical barrier, such as a new freeway with limited access between neighborhoods on either side of the freeway, or major street closures. The Project would not involve any street vacation or closure or result in development of new thoroughfares or highways. The Project, which would involve the redevelopment of three Project Sites with infill development including office, residential, and commercial uses in an urbanized area in Los Angeles, would not divide an established community since there is no residential community located within the Project Sites.

MINERAL RESOURCES

The Project Sites are not located within an identified Mineral Resource Zone (MRZ), as determined by the State Mining and Geology Board, or as designated by the Conservation Element of the City of Los Angeles General Plan, or within an “O” (Oil Drilling) District, City-designated Oil Drilling/Surface Mining

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17 The pool amenity on Site 2 would not be considered a water feature because it would be regularly maintained to preclude mosquito or other vector growth.


Supplemental Use District, or City-designated Oil Field/Drilling Area. In addition, the Project would not directly or indirectly impact any known oil drilling activities or facilities in the surrounding area. Therefore, Project development would not result in the loss or nonavailability of any known, local or regionally valuable mineral resource, and no impact to mineral resources would occur.

**NOISE (PROXIMITY TO AIRPORTS)**

The nearest airport to the Project Sites is the Santa Monica Municipal Airport, located more than 9 miles to the west. The Project Sites are not located within an airport land use plan or within the vicinity of a private airstrip. As such, the Project would not expose people to excessive aircraft noise levels.

**POPULATION AND HOUSING (DISPLACEMENT OF HOUSING, DISPLACEMENT OF PEOPLE)**

The Project would redevelop three Project Sites that currently contain office uses, parking and no housing. Therefore, no housing or people would be displaced as a result of project development.

**RECREATION (REGIONAL OPEN SPACE CONNECTIVITY)**

The Project Sites are located in a highly urbanized area in the Wilshire community of Los Angeles that contains no existing regional open space or trails that could be affected by implementation of the Project. Therefore, the Project would have no impact related to interference with open space connectivity.

**TRANSPORTATION AND TRAFFIC (AIR TRAFFIC PATTERNS)**

The Project does not include any aviation-related uses and would have no airport impact. It would also not require any modification of flight paths for the existing airports in the Los Angeles Basin. Because the County office building on Site 1 would be over 250 feet in height, the Developer would be required to notify the Federal Aviation Administration prior to commencing construction on Site 1 by filing FAA Form 7460–1, Notice of Proposed Construction or Alteration, at least 45 days prior to commencing construction, in accordance with existing regulations. Therefore, no impact would occur.

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