

## Chapter 6

# Other Environmental Considerations

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This chapter evaluates the following environmental considerations under the California Environmental Quality Act (CEQA): effects not found to be significant, based on analysis contained in the Initial Study (see Appendix A of this draft environmental impact report (Draft EIR)); significant and unavoidable adverse environmental impacts; significant irreversible environmental changes; and growth-inducing impacts.

## 6.1 Effects Found Not to Be Significant

Section 15128 of the CEQA Guidelines (14 California Code of Regulations) states:

An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of the project were determined not to be significant and were therefore not discussed in detail in the EIR. Such a statement may be contained in an attached copy of a Notice of Preparation/Initial Study.

In accordance with the requirements of CEQA, the City of Los Angeles (City) prepared a Notice of Preparation/Initial Study (NOP/IS), dated July 27, 2017, that identified the topics to be analyzed in the EIR. The NOP/IS is contained in Appendix A of this Draft EIR.

The City, as the CEQA lead agency, determined in the IS that the proposed Project (Project) would result in no impact for the following resource areas and, therefore, eliminated them from further analysis in the Draft EIR:

- Agriculture and Forestry Resources
- Mineral Resources
- Population and Housing
- Recreation

The analyses presented in Chapter 3 of this Draft EIR concluded that the Project would result in a less than significant impact, without any required mitigation, for the following resource areas:

- Aesthetics (Construction Scenarios 1 and 2 sites only; see Chapter 2 *Project Description*, for a discussion of the construction scenarios)
- Air Quality
- Biological Resources
- Cultural Resources (Construction Scenarios 1 and 2 sites only; see Chapter 2 *Project Description*, for a discussion of the construction scenarios)
- Energy
- Geology and Soils
- Greenhouse Gas Emissions

- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Public Services
- Recreation
- Transportation/Traffic
- Tribal Cultural Resources (Construction Scenarios 1 and 2 sites only; see Chapter 2, *Project Description*, for a discussion of the construction scenarios)
- Utilities and Service Systems
- Wildfire Hazards

## 6.2 Significant and Unavoidable Adverse Impacts

CEQA Guidelines Section 15126.2(c) states that the EIR must describe any significant impacts, including those that can be mitigated but not reduced to a less than significant level. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons the project is being proposed, notwithstanding their effect, should be described.

The analyses presented in Chapter 3 of this Draft EIR concluded that the Project would result in significant and unavoidable adverse impacts, with no feasible mitigation, for the following resource areas:

- Aesthetics (Scenario 3 only) – Significant and unavoidable adverse impacts to aesthetics would occur in Scenario 3 construction projects where *The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings* (SOI Standards) cannot be fully implemented and a historic resource is demolished, destroyed, or damaged in such a way that its integrity and importance is impacted.
- Cultural Resources (Scenario 3 only) - Significant and unavoidable adverse impacts to historical, archeological, and paleontological resources would occur in Scenario 3 construction projects where despite the implementation of SOI Standards, archaeological treatment plans (ATPs), and paleontological management treatment plans, the significance of the historical, archaeological, and/or paleontological resource cannot be maintained.
- Noise - Significant and unavoidable adverse impacts related to construction noise and construction vibration would occur in the limited instances where: a 10-foot distance for commercial sensitive receptors and a 20-foot distance for residential sensitive uses cannot be maintained from the construction noise source; an 8-foot distance cannot be maintained from the closest occupied space façade of the closest sensitive receptor; or a 23-foot distance cannot be maintained from the vibratory equipment to the nearest occupied space of a sensitive receptor.
- Tribal Cultural Resources (Scenario 3 only) - Significant and unavoidable adverse impacts to tribal cultural resources would occur in Scenario 3 construction projects where despite the

implementation of SOI Standards and ATPs, the significance of the tribal cultural resource cannot be maintained.

As discussed in Chapter 4, *Alternatives*, some or all of the significant impacts may not be reduced to less than significant while meeting all of the Project objectives. Also, Chapter 4, *Alternatives* discusses the feasibility of the alternatives that were suggested during the NOP public comment period and whether or not they meet the project objectives or reduced an impact to less than significant levels.

As discussed in Chapter 2, *Project Description*, the Project would continue ongoing sidewalk repair work in compliance with the *Willits* Settlement. Furthermore, through the proposed ordinance, most of the sidewalk repair and street tree removal and replacement work will be more efficient and streamlined. Finally, as set forth in Chapter 3, *Environmental Impact Analysis*, the extent to which significant impacts occur would be in rare instances under Scenario 3, in Aesthetics, Cultural, and Tribal Cultural resource areas. The impacts identified in the Noise resource area from certain construction activities of the Project are a significant impact to the environment.

### **6.3 Significant Irreversible Environmental Changes That Would Be Caused by the Project Should It Be Implemented**

CEQA Guidelines Section 15126.2(d) indicates that uses of nonrenewable resources during the initial and continued phases of a project may be irreversible because a large commitment of such resources makes removal or nonuse thereafter unlikely. Irretrievable commitments of resources should be evaluated to ensure that such current consumption is justified.

Implementation of the Project would occur throughout the City at various places and times. The continuation of construction activities would include the irreversible commitment of natural resources, energy, and human resources. The continuation of ongoing maintenance and inspection of the repaired sidewalks and replacement trees would entail a further irreversible commitment of energy resources in the form of gasoline and electricity.

In summary, implementation of the Project would involve the following irreversible environmental changes:

- Use of the following essential public services: fire and police protection, solid waste, and utility and services systems, including water and wastewater.
- Consumption of transportation fuels during construction and operation and increase in consumption of electricity for cooling during temporary construction and operation as they will overlap for 30 years.
- Temporary and permanent commitment of water resources as a result of construction and operation.
- Utilization of various new raw materials such as sand and gravel for the creation of cement required for sidewalk repair.

Although the Project would require the commitment of nonrenewable resources, sidewalk repair under the Project would ensure the safety of the City and the mobility of all people within the City. Over the long term, the Project would also improve air quality and increase tree canopy throughout

the City. Therefore, the significant irreversible changes have been deemed acceptable in light of the Project's overall benefits.

## 6.4 Growth-Inducing Impacts

According to CEQA Guidelines Section 15126.2(e), growth-inducing impacts of the Project must be discussed in the EIR. Growth-inducing impacts are those effects of the Project that might foster economic or population growth or the construction of new housing, either directly or indirectly, in the surrounding environment. According to CEQA, increases in the population may affect capacity of existing community service facilities, requiring construction of new facilities that could cause significant environmental effects.

As stated in Chapter 2, *Project Description*, the broad purpose of the Project is to ensure that the City's sidewalk and curb ramps are compliant with applicable accessibility requirements. All proposed repairs would comply with applicable accessibility requirements. Additionally, the Project may include the removal and replacement of street trees as well as utility relocations.

The Project would not include development of new housing or other population-generating uses that would directly induce population growth or attract a substantial number of workers. In addition, it would not affect the capacity of existing community service facilities, thereby requiring the construction of new facilities, which could cause significant environmental effects. The Project would include the continuation of repairs to existing sidewalks, removal, and replacement of existing street trees, and utility relocations. The Project would not induce new residential development or result in population growth in the service area.

The population within the City has been growing and is projected to keep growing regardless of whether the Project is implemented. The Project would continue the repair and upgrade sidewalks and curb ramps throughout the City and contains no elements, such as new housing or new roadways that would induce growth. Therefore, there would be no growth-inducing impacts, and no mitigation is required.