LOS ANGELES
DEPARTMENT OF CITY
PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

INITIAL STUDY

1235 Vine Street Project

Case Number: ENV-2020-1831-EIR

Project Location: 1223, 1225, 1227, 1229, 1231, 1233, and 1235 North Vine Street and 6311, 6315, 6319, 6323, 6237, and 6333 West La Mirada Avenue, Los Angeles, California 90038

Community Plan Area: Hollywood

Council District: 13—O'Farrell

Project Description: The 1235 Vine Street Project (Project) proposes the development of an eight-story, mixed-use commercial building on a 0.9-acre Project Site, including areas to be merged. The Project would include the development of 109,190 square feet of office uses and 7,960 square feet of ground-floor retail and/or restaurant space. The proposed uses would be located within a single eight-story building with a maximum height of 101 feet and would include parking within four subterranean levels and two above-grade levels. The Project would include excavations to a depth of 45 feet and 57,675 cubic yards of export would be hauled from the Project Site. To accommodate the Project, three commercial buildings and five single-family residences totaling 26,484 square feet, along with associated surface parking, would be demolished. Upon completion, the Project would result in 117,150 square feet of floor area with a floor area ratio (FAR) of 3:1.

PREPARED FOR:
The City of Los Angeles
Department of City Planning

PREPARED BY:
Eyestone Environmental, LLC

APPLICANT:
Runway, Inc.

May 2021

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1 INTRODUCTION

An application for the proposed 1235 Vine Street Project (Project) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles, as Lead Agency, has determined the Project is subject to the California Environmental Quality Act (CEQA) and that the preparation of an Initial Study is required.

This Initial Study (IS) evaluates the potential environmental effects that could result from the construction, implementation, and operation of the Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code Section 21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations Section 15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document. Based on the analysis provided within this Initial Study, the City has concluded the Project may result in significant impacts on the environment, and the preparation of an Environmental Impact Report (EIR) is required. This Initial Study and the forthcoming EIR are intended as informational documents, which are ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE OF AN INITIAL STUDY

The California Environmental Quality Act was enacted in 1970 with several basic purposes, including: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration or Mitigated Negative Declaration is appropriate, an EIR is normally required.[1]

[1] CEQA Guidelines Section 15063(b)(1) identifies the following three options for the Lead Agency when there is substantial evidence that the project may cause a significant effect on the environment: "(A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration.

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1. INTRODUCTION

Describes the purpose and content of the Initial Study and provides an overview of the CEQA process.

2. EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.

3. PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.

4. EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

1.3 CEQA PROCESS

Below is a general overview of the CEQA process. The CEQA process is guided by the CEQA statutes and guidelines, which can be found on the State of California's website (http://resources.ca.gov/ceqa).

1.3.1 Initial Study

At the onset of the environmental review process, the City has prepared this Initial Study to determine if the Project may have a significant effect on the environment. This Initial Study has determined that the Project may have a significant effect(s) on the environment and an EIR will be prepared.

A Notice of Preparation (NOP) is prepared to notify public agencies and the general public that the Lead Agency is starting the preparation of an EIR for the proposed project. The NOP and Initial Study are circulated for a 30-day review and comment period. During this review period, the Lead Agency requests comments from agencies and the public on the scope and content of the environmental information to be included in the EIR. After the close of the 30-day review and comment period, the Lead Agency continues the preparation of the Draft EIR and any associated technical studies, which may be expanded in consideration of the comments received on the NOP.

1.3.2 Draft EIR

Once the Draft EIR is complete, a Notice of Completion and Availability is prepared to inform public agencies and the general public of the availability of the document and the locations where the document can be reviewed. The Draft EIR and Notice of Availability are circulated for a 45-day review and comment period. The purpose of this review and comment period is to provide public agencies and the general public an opportunity to review the Draft EIR and comment on the adequacy of the document, including the analysis of environmental effects, the mitigation measures presented to reduce potentially significant impacts, and the alternatives analysis. After the close of the 45-day review and comment period, responses to all comments on environmental issues received during the comment period are prepared.

1.3.3 Final EIR

The lead agency prepares a Final EIR, which incorporates the Draft EIR or any revisions to the Draft EIR, comments received on the Draft EIR and list of commenters, and responses to significant environmental points raised in the review and consultation process.

The decision-making body then considers the Final EIR, together with any comments received during the public review process, and may certify the Final EIR and approve the Project. In addition, when approving a project for which an EIR has been prepared, the Lead Agency must prepare findings for each significant effect identified, a statement of overriding considerations if there are significant impacts that cannot be mitigated, and a mitigation monitoring and reporting program.

2 EXECUTIVE SUMMARY

PROJECT TITLE	**1235 Vine Street Project**
ENVIRONMENTAL CASE NO.	ENV-2020-1831-EIR
RELATED CASES	CPC-2020-1830-GPA-VZC-HD-CU-MCUP-SPR, VTT-83106

PROJECT LOCATION	**1223, 1225, 1227, 1229, 1231, 1233, and 1235 North Vine Street and 6311, 6315, 6319, 6323, 6237, and 6333 West La Mirada Avenue, Los Angeles, California, 90038**
COMMUNITY PLAN AREA	Hollywood
GENERAL PLAN DESIGNATION	Highway Oriented Commercial and Low Medium II Residential
ZONING	C2-1D and RD1.5-1XL
COUNCIL DISTRICT	13—O'Farrell

LEAD CITY AGENCY	**City of Los Angeles**
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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☒ Greenhouse Gas Emissions	☐ Public Services
☐ Agriculture & Forestry Resources	☒ Hazards & Hazardous Materials	☐ Recreation
☒ Air Quality	☐ Hydrology/Water Quality	☒ Transportation
☐ Biological Resources	☒ Land Use/Planning	☒ Tribal Cultural Resources
☒ Cultural Resources	☐ Mineral Resources	☒ Utilities/Service Systems
☒ Energy	☒ Noise	☐ Wildfire
☐ Geology/Soils	☐ Population/Housing	☒ Mandatory Findings of Significance

DETERMINATION

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).

5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.

   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated

7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.

9) The explanation of each issue should identify:

   a) The significance criteria or threshold, if any, used to evaluate each question; and

   b) The mitigation measure identified, if any, to reduce the impact to less than significance.

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The 1235 Vine Street Project (Project) proposes the development of an eight-story, mixed-use commercial building on a 39,154-square-foot (0.9-acre) site, prior to dedications per the Vesting Tentative Tract Map [2] The Project would include the development of 109,190 square feet of office uses and 7,960 square feet of ground-floor retail and/or restaurant space. The proposed uses would be located within a single eight-story building with a maximum height of 101 feet and would include parking within four subterranean levels and two above-grade levels. The Project would include excavations to a depth of 45 feet and 57,675 cubic yards of export would be hauled from the Project Site. To accommodate the Project, three commercial buildings and five single-family residences totaling 26,484 square feet, along with associated surface parking, would be demolished. Upon completion, the Project would result in 117,150 square feet of floor area with a floor area ratio (FAR) of 3:1.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located at 1223–1235 North Vine Street and 6311–6333 West La Mirada Avenue, within the Hollywood Community Plan area of the City. As shown in Figure 1 on page 8 the Project Site is bounded by the Villa Elaine Apartments to the north, retail uses and the Hollywood Mental Health Center to the east, the Taglyan Cultural Complex (an event venue) to the south, along with single- and multi-family residential buildings to the west. Regional access to the Project Site is provided by Santa Monica Boulevard, located approximately 0.2 mile south of the Project Site and the Hollywood Freeway (US-101) located approximately 1.0 mile east of the Project Site. Local access to the Project Site is provided by La Mirada Avenue and Vine Street.

3.2.2 Existing Conditions

As shown in Figure 2 on page 9, the Project Site is currently developed with three commercial buildings and five single-family residences totaling 26,484 square feet. There is also a surface parking lot that serves existing uses. Vehicular access to the Project Site is provided by three driveways on La Mirada Avenue, one for the existing commercial uses and two for the existing residential uses. Pedestrian access to the Project Site is located along Vine Street and La Mirada Avenue. Existing landscaping within the Project Site includes eight private property trees and one City right-of-way tree on Vine Street.

The Project Site is located within the planning boundary of the Hollywood Community Plan[3] area. The Project Site has a General Plan land use designation of Highway Oriented Commercial and Low

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2 Following dedications per the Vesting Tentative Tract Map, the Project Site would be 35,112 square feet.

3 The City is currently in the process of updating the Hollywood Community Plan. The most recent draft was released in August 2020 and is available at https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update#the-plan.

Figure 1
Project Location Map

Source: Eyestone Environmental, 2020.

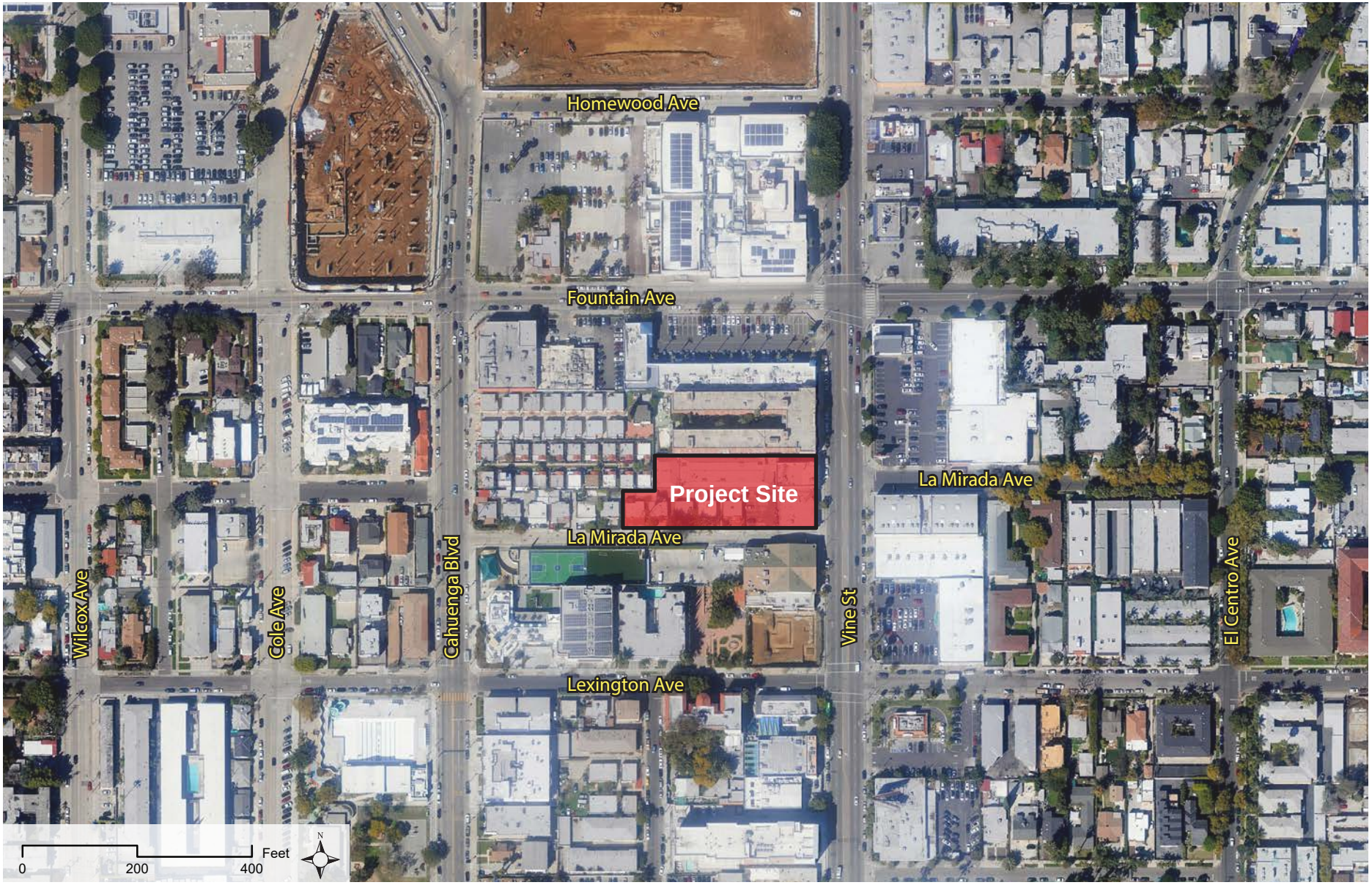

Figure 2
Aerial Photograph of the Project Vicinity

Source: Google Earth Pro, 2020; Eyestone Environmental, 2020.

Medium II Residential and is zoned C2-1D (Commercial, Height District 1 Development Limitation) and RD1.5-1XL (Restricted Density Multiple Dwelling, Height District 1XL). Pursuant to the LAMC, the C2 Zone permits C1.5 (limited commercial) uses, retail with limited manufacturing, service stations and garages, retail contractor business, churches, schools, auto sales, and R4 (multiple dwelling) uses. The RD1.5 Zone permits one-family dwellings, two-family dwellings, apartment houses, multiple dwellings, and home occupation uses.

The Height District 1 Development Limitation, in conjunction with the C2 Zone, has no height limit and an FAR of 0.5:1 per Ordinance No. 164,704 (effective May 16, 1989). The Height District 1XL designation for the RD1.5 Zone limits a structure's height to two stories and 30 feet and an FAR of 3:1. The Project Site is also located within the boundaries of the Los Angeles State Enterprise Zone and Revised Hollywood Injunction.[4]

The Project Site is well served by a variety of public transit options provided by the Los Angeles County Metropolitan Transit Authority (Metro) and the Los Angeles Department of Transportation (LADOT). Specifically, transit options in the vicinity of the Project Site include the Hollywood/Vine station of the Metro B (Red) Line (located approximately 0.5 mile north of the Project Site); Metro bus lines 4, 210, 704; and DASH Hollywood.

3.2.3 Surrounding Land Uses

The Project Site is located in a highly urbanized area developed with a mix of commercial and residential uses. Land uses located adjacent to the Project Site include residential uses to the north, commercial uses to the east and south, and residential uses to the west. The uses surrounding the Project Site have a land use designation of Highway Oriented Commercial along with Low Medium II Residential and are zoned C2-1D (Commercial, Height District 1 Development Limitation), RD1.5-1XL (Restricted Density Multiple Dwelling, Height District 1XL), C2-1-SN (Commercial, Height District 1, Sign District), and (Q)C2-1-SN (Qualified Classification, Commercial, Height District 1, Sign District).

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

As described above, the Project proposes the development of an eight-story, mixed-use building that would include office, retail, and/or restaurant uses on the 0.9-acre Project Site in the Hollywood Community Plan Area of the City. Specifically, the Project would include the development of 117,150 square feet of floor area consisting of 109,190 square feet of office uses and 7,960 square feet of ground-floor retail and/or restaurant uses. The Project would also include approximately 21,000 square feet of open space, including terraces on the upper floors. The proposed uses would be located within a single eight-story building with a maximum height of 101 feet. In accordance with the

[4] As of April 2, 2014, the 2012 Hollywood Community Plan Update (HPCU) and its associated zoning ordinance (Ordinance No. 182,173) have been rescinded. Per City Zoning Information (ZI) File No. 2433, the Department of Building and Safety shall not issue any permit unless the project receives an HCPU Injunction REVISED Clearance from the Department of City Planning confirming that the project conforms to the General Plan Land Use designation, including street classifications, and the zoning regulations in place prior to June 19, 2012, i.e., the 1988 Hollywood Community Plan and corresponding zoning ordinances.

LAMC, the Project would provide 235 vehicular parking spaces and 41 bicycle parking spaces (26 long-term and 15 short-term) within four subterranean parking levels and two fully enclosed and mechanically ventilated above-grade parking levels. Three commercial buildings and five single-family residences, totaling 26,484 square feet, and associated surface parking, would be demolished to accommodate the Project. The Project would include excavations to a depth of 45 feet and approximately 57,675 cubic yards of export would be hauled from the Project Site. Vehicular access to the Project Site would be along La Mirada Avenue and pedestrian access would be provided along Vine Street and at the corner of the Vine Street and La Mirada Avenue intersection. Upon completion, the Project would result in a total of 117,150 square feet of floor area with an FAR of 3:1.

3.3.2 Design and Architecture

As previously discussed, the proposed uses would be located within a single eight-story building with a maximum height of 101 feet. As shown in Figure 3 on page 12, the proposed building's ground floor would include the retail/restaurant uses as well as a lobby for the office uses. The ground level would also include showers, lockers, and storage areas that would be adjacent to the office lobby consistent with the City's Bicycle Parking Ordinance (Ordinance No. 185480). The ground level includes a mezzanine that is open to the commercial lobby and restaurant below and would also include additional parking. Levels 2 through 8 would include the remaining office uses. As discussed further below, Levels 2, 4, 6, 7, and 8 would provide outdoor terraces.

The Project seeks to complement the uses, density, and architectural styles that characterize Vine Street. The building includes arches along the ground-floor street frontages that vary in size and scale to provide relief and a unique aesthetic compared to the more rigid articulation of the frame in the upper volumes of the building. The Vine Street-facing restaurant, office lobby, and rear-facing above-grade parking are organized into a unified base that relates to the local street scale, and tie into the neighboring residential uses. The arched colonnade also provides shade to outdoor dining and seating areas. At the upper levels, the building steps down from eight stories at its highest point to two stories along the residential uses to the west. These forms are intended to focus massing and height along the commercial corridor and reducing the building size nearest the adjacent residential neighborhood. The design would also widen La Mirada Avenue 9.5 feet east of the proposed driveway and 5.5 feet to its west to improve traffic flow from Vine Street to the parking entrance along La Mirada Avenue, while retaining a wider sidewalk on the west side of the building. This widening will require a 15-foot dedication along La Mirada Avenue from the driveway east towards Vine Street, a waiver of a 15-foot dedication along La Mirada Avenue west of the driveway, and a 5.5 dedication on the west side of the driveway. The limits of sidewalk widening will be determined by the amount of right-of-way dedicated to the City. Materials to be used for the development feature glass, pigmented concrete, and metal cladding. Furthermore, large planted terraces will be provided at multiple levels of the building. A conceptual rendering is provided in Figure 4 on page 13.

3.3.3 Open Space and Landscaping

Although the LAMC does not require commercial and office developments to include open space, the Project would incorporate a variety of open space and amenities throughout the Project Site. The building would include eight terraces that would be located on multiple levels throughout the building. Specifically, the Project would include outdoor terraces totaling approximately 21,000 square feet on Levels 2, 4, 6, 7, and 8 which would provide seating, lounge areas, and landscaping. Also, the

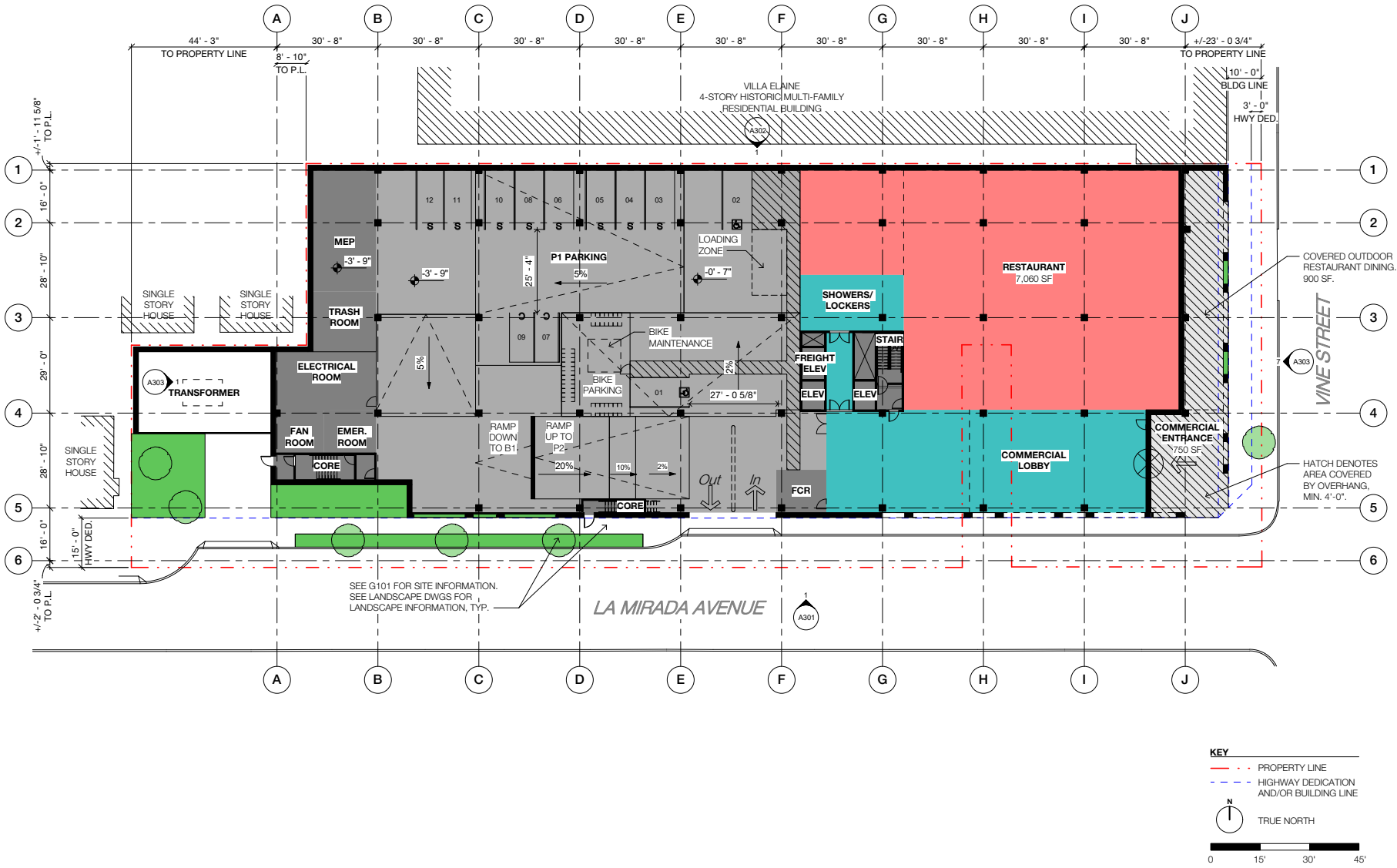

Figure 3
1st Floor Plan

Source: Gruen Associates, 2020.

Figure 4
Conceptual Rendering

Source: Gruen Associates, 2020.

Project would feature a driveway with a restrained system driveway,[5] lightweight concrete pots, and steel planters adjacent to the transformer/electrical equipment area. Specifically, the Project would provide 21,000 square feet of open space and 4,875 square feet of landscaped area at the ground floor and on the terraces, although none is required by the LAMC for commercial and office developments. Eight private property trees would be removed as part of the Project and the one City right-of-way tree along Vine Street would remain. Four new street trees would be planted along La Mirada Avenue.

3.3.4 Access, Circulation, and Parking

Vehicular access to the Project Site would be along La Mirada Avenue, which would provide ingress and egress, with one ramp within the parking garage leading into the subterranean parking garage and another ramp leading to the upper levels of the parking garage. A driveway providing access to the transformer and mechanical equipment areas would also be located along La Mirada Avenue. Primary pedestrian access into the Project Site would include direct access from Vine Street and at the corner of the Vine Street and La Mirada Avenue intersection.

Based on LAMC requirements under Section 12.21 for the proposed land uses, the Project would provide 235 vehicle parking spaces. The Project would also provide 41 bicycle parking spaces (comprised of 26 long-term spaces and 15 short-term spaces). Bicycle showers and lockers would be provided on the ground floor. Parking would be provided within four subterranean levels, which would extend to a maximum depth of 45 feet below the ground surface, and in two fully-enclosed and mechanically ventilated above grade parking levels.

3.3.5 Lighting and Signage

Exterior lighting along the public areas would include pedestrian-scale fixtures and elements. Low-level exterior lights would also be incorporated on the building and along pathways for security and wayfinding purposes as well as to accent signage, architectural features, and landscaping elements throughout the site. Project lighting would be shielded and directed on site in order to minimize light trespass from the Project Site. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations, and would be approved by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties.

Project signage would be designed to be aesthetically compatible with the proposed architecture of the Project and other signage in the area. Proposed signage would include mounted Project identity signage, building and commercial tenant signage, and general ground-level and wayfinding pedestrian signage. Wayfinding signs would be located at parking garage entrances, elevator lobbies, vestibules, and corridors. No off-site advertising is proposed as part of the Project, and all signage would comply with the requirements of the LAMC.

[5] Per the LAMC, restrained system driveways are a plastic or concrete grid system confined on all sides to restrict lateral movement and filled with gravel or grass in the voids.

3.3.6 Sustainability Features

The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce and conserve energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. In addition to meeting California's Title 24 Energy Code, the Project would include LEED Silver® Certification-equivalency and Well Certification-equivalency. The sustainability features to be incorporated into the Project include, but would not be limited to the following: photovoltaic cells; electric vehicle parking; a transportation demand management program; material recycling stations; highly efficient HVAC systems; energy-efficient wall insulation and glazing units; WaterSense-labeled plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star–labeled appliances; and water-efficient landscape design.

3.3.7 Site Security

The Project would include numerous security features, which may include a closed-circuit camera system and keycard entry for the office uses and parking areas. The Project would also be designed such that entrances to and exits from buildings, open spaces around buildings, and pedestrian walkways would be open and in view of surrounding sites. In addition, buildings and walkways would be properly lit in order to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings. Parking areas would also be sufficiently lit to maximize visibility and reduce areas of concealment.

3.3.8 Anticipated Construction Schedule

Construction of the Project is anticipated to begin in 2022 with completion by 2025. Construction would commence with demolition of the existing structures and surface parking. This phase would be followed by grading and excavation for the subterranean parking. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. It is estimated that approximately 57,675 cubic yards of export would be hauled from the Project Site.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The Environmental Impact Report will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Pursuant to LAMC Section 11.5.6, a General Plan Amendment to amend the Hollywood Community Plan to redesignate the Project Site from a "Low Medium II Residential" and "Highway Oriented Commercial" to a "Community Commercial" land use designation;

- Pursuant to LAMC Section 12.32-F and 12.32-Q, a Vesting Zone Change for westerly portions of the Project Site from RD1.5 to C2 to allow for commercial uses across the entire Project Site;

- Pursuant to LAMC Section 12.32-F, a Height District Change from Height District No. 1XL and Height District No. 1D to Height District No. 2 with a D Limitation to allow a 3:1 FAR;

- Pursuant to LAMC Section 12.24-U.14, a Conditional Use Permit for a Major Development Project for the construction of 100,000 square feet or more of non-residential or non-warehouse uses in the C2 zone;

- Pursuant to LAMC Section 12.24.W.1, a Master Conditional Use Permit to allow the sale or dispensing of a full line of alcoholic beverages for on-site and off-site consumption in conjunction with a 7,960 square foot restaurant/retail space;

- Pursuant to LAMC Section 16.05, a Site Plan Review for a development that creates, or results in an increase of 50,000 gross square feet or more of nonresidential floor area;

- Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map to merge the existing lots and an alley located between lots and accessible from La Mirada Avenue, and re-subdivide into a ground lot and airspace lots; and

- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

3.5 RESPONSIBLE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (CEQA Guidelines Section 15381). No responsible agencies have been identified for the Project.

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) §21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." PRC Section 21099 defines a "transit priority area" as an area within 0.5 mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21099 defines an "employment center project" as "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099 defines an "infill site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA."[6]

Although the Project Site is designated as a TPA in ZIMAS based on the identification of major transit stops at the intersections of Santa Monica Boulevard & Vine Street and Sunset Boulevard & Vine Street on City maps, and although the Project qualifies as an employment center project under PRC Section 21099, a review of bus headways at nearby bus stops indicates they are not frequent enough for the Project Site to be designated as a TPA. Therefore, an analysis of aesthetics impacts is provided below.

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6 City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a. Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. A scenic vista is a panoramic view of a valued visual resource. Based on the City's 2006 L.A. CEQA Thresholds Guide, panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. According to the L.A. CEQA Thresholds Guide, panoramic views are typically associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley mountain range, the ocean, or other water bodies.

As discussed in Section 3, Project Description, of this Initial Study, the Project Site is located in the highly urbanized Hollywood Community Plan area of the City. Land uses located adjacent to the Project Site include residential uses to the north, commercial uses to the east and south, and single- and multi-family residential buildings to the west. Due to the highly urbanized and built out surroundings, publicly available scenic vistas of any valued visual resources that may exist in the vicinity of the Project Site are not available. Therefore, development of the Project would not have the potential to substantially or adversely affect a scenic vista since none currently exist. Impacts would be less than significant, and no mitigation measures are required. Therefore, no evaluation of this topic in an EIR is required.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The Project Site is not located along a state scenic highway. The nearest eligible state scenic highway is Interstate 210 (I-210) between Interstate 5 and State Route 134, located approximately 11 miles northeast of the Project Site and the nearest designated state scenic highway is State Route 2 (SR-2) north of Interstate 210, which is located outside the City of Los Angeles, approximately 12 miles northeast of the Project Site.[7] Thus, the Project would not substantially damage scenic resources within a designated scenic highway as there are no scenic highways along the Project Site. Therefore, no evaluation of this topic is required.

c. In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is located within the Hollywood Community Plan area of the City, in an urbanized area. As such, this analysis focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

The existing Community Plan land use designations for the Project Site are Highway Oriented Commercial and Low Medium II Residential and the Project Site is zoned C2-1D (Commercial, Height District 1 Development Limitation) and RD1.5-1XL (Restricted Density Multiple Dwelling, Height District 1XL). Pursuant to the LAMC, the C2 Zone permits C1.5 (limited commercial) uses, retail with limited manufacturing, service stations and garages, retail contractor business, churches, schools, auto sales, and R4 (multiple dwelling) uses. The RD1.5 Zone permits one-family dwellings, two-family dwellings, apartment houses, multiple dwellings, and home occupations uses. The Height District 1 Development designation, in conjunction with the C2 Zone has no height limit and an FAR of 0.5:1 per Ordinance No. 164,704 (effective May 16, 1989). The Height District 1XL designation for the RD1.5 Zone limits a structure's height to two stories and 30 feet and an FAR of 3:1. The Project Site is also located within the boundaries of the Los Angeles State Enterprise Zone and Revised Hollywood Injunction.[8]

As described in Section 3, Project Description, of this Initial Study, the Project would develop new office, restaurant, and retail uses totaling 117,150 square feet. Specifically, the Project would include the development of 117,150 square feet of total area consisting of approximately 109,190 square feet of office uses and 7,960 square feet of restaurant and/or retail space. These proposed uses would be consistent with the types of uses anticipated for the Project Site's existing RD1.5-1XL and C2-1D zoning. The Project also proposes a General Plan Amendment to the Hollywood Community Plan and a Vesting Zone Change to create a uniform and tailored set of zoning and development standards

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7 Caltrans, List of Designated and Eligible State Scenic Highways, August 2019.

8 As of April 2, 2014, the 2012 Hollywood Community Plan Update (HPCU) and its associated zoning ordinance (Ordinance No. 182,173) have been rescinded. Per City ZI File No. 2433, the Department of Building and Safety shall not issue any permit unless the project receives an HCPU Injunction REVISED Clearance from the Department of City Planning confirming that the project conforms to the General Plan Land Use designation, including street classifications, and the zoning regulations in place prior to June 19, 2012, i.e., the 1988 Hollywood Community Plan and corresponding zoning ordinances.

to facilitate and expedite implementation of the Project, as well as a Height District Change to allow a 3:1 FAR. Upon approval of the General Plan Amendment and Vesting Zone Change, the Project will be consistent with the zoning and land use designations on the Project Site.

With regard to the City's regulations governing scenic quality, local land use plans applicable to the Project Site also include policies governing scenic quality, including the Citywide General Plan Framework Element, Citywide Design Guidelines, and Hollywood Community Plan.[9] The Project's consistency with the general intent of these plans is briefly discussed below.

Citywide General Plan Framework

The City General Plan Framework Element provides direction regarding the City's vision for future development in the City and includes an Urban Form and Neighborhood Design chapter to guide the design of future development. One of the key objectives of the Urban Form and Neighborhood Design Chapter is to enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm (Objective 5.5). The Project would enhance the built environment in the surrounding neighborhood and upgrade the quality of development by replacing disparate buildings, and integrating landscaping, including new and existing street trees along all street frontages. The Project also would include terraces that would be located on multiple levels throughout the building and would feature outdoor dining seating, lounge seating, and landscaping. The new landscaping would be an improvement over existing conditions and would amplify the pedestrian oriented nature of the Project's ground floor design.

Citywide Design Guidelines

The Citywide Design Guidelines establish guidelines to carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions. With respect to scenic quality, as discussed above, the Project would enhance the pedestrian experience with a new pedestrian-oriented building, extensive landscaping and open space, and new street trees along the street frontages.

Hollywood Community Plan

Objective 7 of the Hollywood Community Plan encourages the preservation of open space and views, natural character, and topography of mountainous parts of the City. As discussed above, due to the highly urbanized and built out surroundings, publicly available scenic vistas of any valued visual resources that may exist in the vicinity of the Project Site are not available and the Project would not conflict with this objective.

Conclusion

Based on the above, the Project would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, no evaluation of this topic in an EIR is required.

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[9] The Hollywood Community Plan does not include policies governing scenic quality.

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The existing ambient nighttime lighting environment within the Project Site and vicinity is typical of a developed, urban environment where the primary nighttime lighting sources include interior light spillage from buildings, vehicle headlights along roadways and in parking areas, signage, street lamps, and security/parking lighting. Glare sources within the Project Site and vicinity include glass and metal, vehicle and building surfaces. The Project would introduce new sources of light and glare that are typically associated with commercial uses, including architectural lighting, signage lighting, interior lighting, and security and wayfinding lighting. Construction of the Project also has the potential to generate light and glare. Land uses located adjacent to the Project Site include residential uses to the north, commercial uses to the east and south, and single- and multi-family residential buildings to the west. The topography of the surrounding adjacent areas varies, providing different viewing aspects to the Project Site. Provided below is an analysis of the Project's potential impacts related to light and glare during construction and operation.

Construction

The Project's construction hours would comply with the LAMC, which provides that construction activities be limited to the hours of 7:00 A.M. to 9:00 P.M. Monday to Friday and 8:00 A.M. to 6:00 P.M. on Saturday. Pursuant to the LAMC, no construction activities are permitted on Sundays. Given the nature of the construction labor force (with a typical eight-hour workday beginning at 7:00 A.M.), the majority of Project construction would occur during daylight hours. However, there is a potential that construction activities could require the limited use of artificial lighting during the winter season when daylight may not be sufficient earlier in the day. Outdoor lighting sources such as floodlights, spot lights, and/or headlights associated with construction equipment and hauling trucks typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of proposed Project construction. Further, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. In addition, construction lighting, while potentially bright, would be highly focused on the particular area undergoing work. Thus, with adherence to existing LAMC regulations, construction of the Project would not create a new source of substantial light which would adversely affect day or nighttime views in the area.

Daytime glare could potentially accompany construction activities if reflective construction materials were positioned in highly visible locations where glare conditions (e.g., orientation and presence of glare-sensitive uses) could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities within each area of the Project Site. In addition, large surfaces that are usually required to generate substantial glare are typically not an element of construction activities. Furthermore, construction activities would be screened by temporary fencing and surrounding perimeter landscaping. As such, construction of the Project would not create a new source of substantial glare which would adversely affect day or nighttime views in the area.

Operation

Exterior lighting along the public areas would include pedestrian-scale (i.e., lower to the ground, spaced closer together) fixtures. Exterior lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the Project Site. Project lighting would be designed to minimize light trespass from the Project Site and would comply with all LAMC requirements. Night lighting at the Project Site would be low profile and at the necessary intensity to provide a safe walkable environment along walking paths. Roof terrace lighting would be of similar light levels, directed downward towards walkable surfaces, and shielded from view of the adjacent residential neighbors. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would require approval from the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on sidewalks and roadways while minimizing light and glare on adjacent properties.

The proposed lighting sources would be similar to other lighting sources on the Project Site and in the Project Site vicinity and would not generate artificial light levels that are out of character with the surrounding area. Any new outdoor lighting provided by the Project would be low-level and would not result in a substantive change in ambient illumination levels over existing conditions. In addition, outdoor security and architectural lighting would be shielded and directed onto building surfaces and towards the interior of the Project Site to avoid light spillover onto sensitive uses. Project lighting would also meet all applicable LAMC lighting standards. As required by LAMC Section 93.0117(b), exterior light sources and building materials would not cause more than two (2) foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units; an elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas, or any other property containing a residential unit or units.

With regard to glare, daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. Sun reflection can also occur with reflected light from parked vehicles. In general building materials would include glass, pigmented concrete, and metal cladding. In addition, all parking would be provided within four subterranean parking levels and two fully enclosed and mechanically ventilated above-grade parking levels As such, there would be limited potential from glare associated with parked vehicles. Glass and metal used in building façades would also be low-reflective or treated with an anti-reflective coating to minimize glare.

Conclusion

Based on the above, Project operation would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, no evaluation of this topic in an EIR is required.

II. AGRICULTURE AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The Project Site is located in an urbanized area of the City. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with three commercial buildings and five residential bungalows totaling approximately 26,484 square feet. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site and surrounding

area are also not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.[10] As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project Site is zoned as C2-1D and RD1.5-1XL. Pursuant to the LAMC, the C2 Zone permits C1.5 (limited commercial) uses, retail with limited manufacturing, service stations and garages, retail contractor business, churches, schools, auto sales, and R4 (multiple dwelling) uses. The RD1.5 Zone permits one-family dwellings, two-family dwellings, apartment houses, multiple dwellings, and home occupations uses. The Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area. The Project Site and surrounding area are also not enrolled under a Williamson Act contract.[11] Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act contract. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. As previously discussed, the Project Site is located in an urbanized area and is currently developed with three commercial buildings and five residential bungalows totaling approximately 26,484 square feet. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned for commercial and restricted density multiple dwelling uses and is not zoned for forest land and is not used as forest land.[12] Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the Public Resources Code. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As previously discussed, the Project Site is located in an urbanized area and does not include any forest land. Therefore, the Project would not result in the loss or conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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[10] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 1235 Vine Street, //zimas.lacity.org/, accessed March 9, 2021.

[11] California Department of Conservation, The Williamson Act Status Report 2016-17.

[12] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 1235 Vine Street, http://zimas.lacity.org/, accessed March 9, 2021.

e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. As discussed above, the Project Site is located in an urbanized area of the City and does not include farmland or forest land. The Project Site and surrounding area are also not mapped as farmland or forest land, are not zoned for farmland/agricultural use or forest land, and do not contain any agricultural or forest uses.[13] As such, the Project would not result in the conversion of farmland to non-agricultural use or in the conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

III. AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☒	☐	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [$PM_{2.5}$], and lead[14]). SCAQMD's 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of

[13] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 1235 Vine Street, http://zimas.lacity.org/, accessed May 22, 2020.

[14] Partial Nonattainment designation for lead for the Los Angeles County portion of the Basin only.

pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.[15] With regard to future growth, SCAG has prepared theRegional Transportation Plan/Sustainable Communities Strategy, which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area. Construction and operation of the Project would result in an increase in stationary and mobile source air emissions. As a result, development of the Project could have a potential adverse effect on SCAQMD's implementation of the AQMP. Therefore, the EIR will provide further analysis of the Project's consistency with SCAQMD's AQMP.

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Potentially Significant Impact. As discussed above, construction and operation of the Project would result in the emission of air pollutants in the Basin, which is currently in non-attainment of federal air quality standards for ozone, $PM_{2.5}$ and lead, and state air quality standards for ozone, particulate matter less than 10 microns in size (PM_{10}), and $PM_{2.5}$. Therefore, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Basin. The EIR will provide further analysis of cumulative air pollutant emissions associated with the Project.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. According to the California Air Resources Board, sensitive receptors include children, the elderly, asthmatics, and others who are at a heightened risk of negative health outcomes due to exposure to air pollution. The locations where these sensitive receptors congregate are considered sensitive receptor locations. As discussed above, the Project could result in increased short- and long-term air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Sensitive receptors located in the vicinity of the Project Site include residential uses. Therefore, the Project could expose sensitive receptors to additional pollutant concentrations and the EIR will provide further analysis of the Project's potential to result in substantial adverse impacts to sensitive receptors.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials 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

[15] SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.

be sufficient to affect a substantial number of people. With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve the operation of uses typically associated with odor complaints. Additionally, on-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on 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?	☐	☐	☐	☒
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on 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?

No Impact. The Project Site is located in an urbanized area and is currently developed with three commercial buildings and five residential bungalows totaling approximately 26,484 square feet. Landscaping within the Project Site is limited to common ornamental trees, grasses, and shrubs. Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings. Based on the lack of habitat on the Project Site, it is unlikely any special status species listed by the California Department of Fish and Wildlife (CDFW)[16] or by the U.S. Fish and Wildlife Service (USFWS)[17] would be present on-site. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City.[18] Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW or USFWS. No impact would occur, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. The Project Site is located in an urbanized area and is currently developed with three commercial buildings and five residential bungalows totaling approximately 26,484 square feet. No riparian or other sensitive natural community exists on the Project Site or in the surrounding area.[19,20] Furthermore, the Project Site and surroundings are not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County of Los Angeles.[21,22] In addition, there are no other sensitive natural communities identified by the CDFW or the USFWS.[23,24,25]

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16 California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, August 2019.

17 United States Fish and Wildlife Service, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, https://ecos.fws.gov/ecp0/reports/ad-hoc-species-report, accessed March 9, 2021.

18 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

19 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 1235 Vine Street, http://zimas.lacity.org/, accessed March 9, 2021.

20 United States Environmental Protection Agency, NEPAssist, https://nepassisttool.epa.gov/nepassist/nepamap.aspx, accessed July 29, 2020.

21 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

22 Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

23 California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), https://apps.wildlife.ca.gov/bios/ /, accessed March 9, 2021.

24 California Department of Fish and Wildlife, CDFW Lands, https://apps.wildlife.ca.gov/lands/ /, accessed March 9, 2021.

25 United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed March 9, 2021.

Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. As discussed above, the Project Site is located in an urbanized area and is currently developed with three commercial buildings and five residential bungalows totaling approximately 26,484 square feet. No water bodies or state and federally protected wetlands exist on the Project Site.[26] In addition, construction of the Project would not result in the removal, filling, or other means of hydrological interruption. As such, the Project would not have an adverse effect on state or federally protected wetlands. No impact would occur, and no mitigation measures are required. Therefore, no further evaluation of this topic in an EIR is required.

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. As described above, the Project Site is located in an urbanized area and is currently developed with three commercial buildings and five residential bungalows totaling approximately 26,484 square feet. In addition, the areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within and surrounding the Project Site that provide linkages to natural open spaces areas which may serve as wildlife corridors. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or the County of Los Angeles.[27, 28]

According to the Tree Survey prepared for the Project by Carlberg Associates in May 2020 and included in Appendix IS-1 of this Initial Study, a total of eight trees are located within the Project Site and one right-of-way tree is located on Vine Street. All private property trees are proposed to be removed and the one City right-of-way tree will be preserved and protected in place. Trees to be removed could potentially provide nesting sites for migratory birds. The Project would comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sale, purchase, barter, or offer for sale, purchase, or barter, of 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. Additionally, California Fish & Game Code Section 3503 (Section 3503) 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." No exceptions are provided in the code and the CDFW has not promulgated regulations interpreting these provisions. Regulatory compliance with the

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[26] United States Environmental Protection Agency, NEPAssist, https://nepassisttool.epa.gov/nepassist/nepamap.aspx, accessed March 9, 2021.

[27] City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

[28] Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

Migratory Bird Treaty Act and California Fish and Game Code would require that tree removal activities take place outside of the nesting season (February 1–August 31), to the extent feasible. In addition, should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. Therefore, with compliance with the Migratory Bird Treaty Act, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

Less Than Significant Impact. The City's Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least 4 inches in diameter at breast height. These tree species are defined as "protected" by the City. Trees that have been planted as part of a tree planting program are exempt from the City's Protected Tree Ordinance and are not considered protected. The City's Protected Tree Ordinance prohibits, without a permit, the removal of any regulated protected tree, including "acts which inflict damage upon root systems or other parts of the tree [...]" and requires that all regulated protected trees that are removed be replaced on at least a 2:1 basis with trees that are of a protected variety.

According to the Tree Survey prepared for the Project by Carlberg Associates in May 2020 and included in Appendix IS-1 of this Initial Study, a total of eight trees are located within the Project Site, including five Queen Palm (*Syagrus romanzoffiana*) trees, one Red Ironbark (*Eucalyptus sideroxylon*) tree, one citrus (*Citrus spp.)* tree, and one Mexican Fan Palm (*Washingtonia robusta*) tree. In addition, there is one Jacaranda (*Jacaranda mimosifolia*) City right-of-way-tree located on Vine Street. All the trees on the Project Site have a trunk diameter of 8 inches or greater, except for the citrus tree, which has a diameter of 4 inches. The City right-of-way tree has a trunk diameter of 7 inches. None of the trees located within the Project Site are considered protected trees and the City right-of-way tree will be preserved and protected in place. In accordance with the Department of City Planning's policy, the on-site trees to be removed would be replaced on a 1:1 basis. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. As described above, the Project Site is located in an urbanized area and is currently developed with three commercial buildings and five residential bungalows totaling approximately 26,484 square feet. As also previously discussed, landscaping within the Project Site is limited, consisting of ornamental trees and the Project Site does not support any habitat or natural

community[29,30] No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.[31] Thus, the Project would not conflict with the provisions of any such plans. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☒	☐	☐	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☒	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

Potentially Significant Impact. CEQA Guidelines Section 15064.5 generally defines a historical resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to PRC Section 5020.1(k)); or (3) identified as significant in a historical resources survey (meeting the criteria in PRC Section 5024.1(g)). Additionally, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register. The local register of historical resources is managed by the Los Angeles Office of Historic Resources, which established SurveyLA, a comprehensive program to identify potentially significant historic resources

[29] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 1235 Vine Street, http://zimas.lacity.org/, accessed March 9, 2021.

[30] United States Environmental Protection Agency, NEPAssist, https://nepassisttool.epa.gov/nepassist/nepamap.aspx, accessed March 9, 2021.

[31] California Department of Fish and Wildlife, California Natural Community Conservation Plans, April 2019.

throughout the City. The Project Site does not include any historical resources. However, immediately to the north of the Project Site is the Villa Elaine, located at 1249 North Vine Street, which is a designated City of Los Angles Historic-Cultural Monument (#675) and which, according to HistoricPlacesLA is identified with "historic personages.[32] Moreover, there are other historical resources in the Project vicinity. As such, the EIR will include an analysis of potential direct and indirect impacts to historical resources.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

Less Than Significant Impact. CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community.

The Project Site is located within an urbanized area of the City of Los Angeles and has been subject to grading and development in the past. Therefore, surficial archaeological resources that may have existed at one time have likely been previously disturbed. On July 27, 2020, the staff at the South Central Coast Information Center (SCCIC) provided the results of a California Historical Resources Information System (CHRIS) records search for the Project site and a 0.5-mile radius. The results of this confidential records search are on file at the Department of City Planning and may be viewed by qualified personnel by appointment. The records indicate that 66 previously recorded cultural resources have been mapped within 0.5 mile of the Project Site. However, none of these resources are within the Project Site. The single archaeological resource recorded within the record search area, but outside of the Project site, consists of historic-age foundations, structural remains, and refuse scatter associated with the pre-World War II occupants in the area (Resource P-19-003545). No prehistoric archeological resources have been recorded within 0.5 mile of the Project Site. Nevertheless, the Project would require grading, excavation, and other construction activities to a depth of 45 feet that could have the potential to disturb existing but undiscovered archaeological resources. Thus, the Project could have the potential to disturb previously undiscovered archaeological resources.

However, the City has established a standard condition of approval to address inadvertent discovery of archaeological resources. Should archeological resources be inadvertently encountered, this condition of approval provides for temporary halting of construction activities near the encounter so the find can be evaluated. An archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements.

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[32] Los Angeles Historic Resources Inventory, www.historicplacesla.org/reports/741eb36d-b9af-4161-b1f8-8f3c4efd8a0e, accessed March 9, 2021.

With implementation of the City's established condition of approval to address any inadvertent discovery of archaeological resources, Project impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. As discussed above, the Project Site is located within an urbanized area and has been subject to previous grading and development. Therefore, the potential for uncovering human remains on the Project Site is low. Nevertheless, the Project would require grading, excavation to a depth of 45 feet, and other construction activities that could have the potential to disturb existing but undiscovered human remains. If human remains are discovered during construction of the Project, work in the immediate vicinity of the construction area would be halted, the County Coroner, construction manager, and other applicable entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), which require that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determines the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the person or persons it believes to be most likely descended from the deceased Native American. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. Therefore, due to the low potential that any human remains are located on the Project Site, and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, the Project's impact related to human remains would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☒	☐	☐	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☒	☐	☐	☐

a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Potentially Significant Impact. As discussed above, the Project Site is currently developed with three commercial buildings and five residential bungalows totaling approximately 26,484 square feet. The Project would remove the existing structures for the development of a mixed-use building with 117,150 square feet of floor area consisting of approximately 109,190 square feet of office uses and 7,960 square feet of retail and/or restaurant space. Due to the increased floor area and type of uses, the Project would generate an increased demand for electricity and natural gas services provided by the Los Angeles Department of Water and Power (LADWP) and the Southern California Gas Company, respectively. While development of the Project would not be anticipated to cause wasteful, inefficient, and unnecessary consumption of energy resources, further analysis of the Project's demand on existing energy resources will be provided in the EIR.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Potentially Significant Impact. First established in 2002 under SB 1078, California's Renewable Portfolio Standard (RPS) required retail sellers of electric services to increase procurement from eligible renewable energy resources to 20 percent of total retail sales by 2017.[33] The program was accelerated in 2015 with SB 350 which mandated a 50 percent RPS by 2030. In 2018, SB 100 was signed into law, which again increases the RPS to 60 percent by 2030 and requires all the state's electricity to come from carbon free resources by 2045. LADWP provides electrical service throughout the City. LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. In accordance with SB 100, LADWP is required to procure at least 60 percent of its energy portfolio from renewable sources by 2030.

Regarding energy efficiency, the California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction, system design, and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2019 Title 24 standards, which became effective on January 1, 2020.[34] The 2019 Title 24 standards include efficiency improvements to the non-residential standards that align with the American Society of Heating and Air-Conditioning Engineers *(*ASHRAE) 90.1 2017 national standards.[35]

As previously described, the Project Site is currently developed with three commercial buildings and five residential bungalows totaling approximately 26,484 square feet. The Project would remove the existing structures for the development of a mixed-use building with 117,150 square feet of floor area consisting of approximately 109,190 square feet of office uses and 7,960 square feet of retail and/or restaurant space. The Project Site does not include any renewable energy sources used by LADWP. The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and

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33 CPUC, California Renewables Portfolio Standard (RPS) Program, www.cpuc.ca.gov/rps/, accessed March 9, 2021.

34 CEC, 2019 Building Energy Efficiency Standards, www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency/, accessed March 9, 2021.

35 CEC, 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, December 2018.

CALGreen. While the Project would not be anticipated to conflict with or obstruct a state or local plan for renewable energy or energy efficiency, the Project's compliance with LADWP's plans for renewable energy as well as the Project's compliance with California Building Energy Efficiency Standards will be further evaluated in the EIR.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

The analysis of geology and soils is based in part on the Geotechnical Investigation prepared for the Project by Geocon West, Inc., dated July 1, 2020. All specific information on geologic and soils conditions in the discussion below is from this report unless otherwise noted. This report is included as Appendix IS-2 of this Initial Study.

The analysis of paleontological resources is based on the *Paleontological Resources Review—1235 Vine Street Project* (Paleontological Memo) prepared for the Project by Dudek, dated August 4, 2020 and revised January 13, 2021. This memo is included as Appendix IS-3 of this Initial Study.

a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. Surface fault rupture occurs when movement on a fault breaks through to the earth's surface.[36] Based on criteria established by the California Geological Survey, faults can be classified as active, potentially active, or inactive. Active faults are faults that have historically produced earthquakes or shown evidence of movement within the past 11,000 years. Potentially active faults have demonstrated displacement within the last 1.6 million years. Inactive faults do no exhibit displacement younger than 1.6 million years before the present. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The California Geological Survey establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones. These zones extend from 200 feet to 500 feet on each side of the known fault and identify areas where a potential surface rupture could provide hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures.

Based on a review of the Earthquake Fault Zones and Seismic Hazard Zones map prepared by the California Department of Conservation, the Project Site is not located within a fault zone.[37] Additionally, based on the City of Los Angeles General Plan Safety Element, the Project Site is not located within an Alquist-Priolo Special Studies Zone.[38] Furthermore, according to the Geotechnical Investigation, included in Appendix IS-2, of this Initial Study, based on research of available literature as well as results of site reconnaissance, no known active faults or potentially active faults with the

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[36] California Department of Conservation, Alquist-Priolo Earthquake Fault Zones, www.conservation.ca.gov/cgs/alquist-priolo, accessed July 29, 2020.

[37] California Department of Conservation, California Geological Survey. Earthquake Fault Zones and Seismic Hazards Zones Map, Hollywood 7.5 Minute Quadrangle, November 6, 2014.

[38] Department of City Planning Los Angeles, Safety Element of the Los Angeles General Plan, Exhibit A—Alquist-Priolo Special Study Zones & Fault Rupture Study Areas in the City of Los Angeles, p. 47.

potential for surface rupture underlie the Project Site. Therefore, the Geotechnical Investigation concluded the potential for surface ground rupture at the Project Site is considered low. Additionally, the Project would not involve mining operations that require deep excavations thousands of feet into the earth, or boring of large areas, which could create unstable seismic conditions or stresses in the earth's crust. Accordingly, the Project would not directly or indirectly cause potential substantial adverse effects involving the rupture of a known earthquake fault. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located in the seismically active region of Southern California and would potentially be subject to strong seismic ground shaking if a moderate to strong earthquake occurs on a local or regional fault. As discussed above, no active faults are known to pass directly beneath the Project Site and the Project Site is not located in an Alquist-Priolo Earthquake Fault Zone. According to the Geotechnical Investigation and ZIMAS, the closest active fault is the Hollywood Fault located approximately 0.7 mile north of the Project Site. State and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. Specifically, the state and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the City's General Plan Safety Element, and the Los Angeles Building Code. Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions thereof before permits can be issued for construction of the Project. Accordingly, the design and construction of the Project would comply with all applicable existing regulatory requirements, the applicable provisions of the Los Angeles Building Code relating to seismic safety, and the application of accepted and proven construction engineering practices. The Los Angeles Building Code incorporates current seismic design provisions of the 2019 California Building Code, with City amendments, to minimize seismic impacts. The 2019 California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of LADBS, including the recommendations provided in a final geotechnical report for the Project, which will be subject to review and approval by LADBS.

Based on the above, through compliance with regulatory requirements and site-specific geotechnical recommendations, the Project would not directly or indirectly cause potential substantial adverse effects involving strong seismic ground shaking. Therefore, the Project's impact related to strong seismic ground shaking would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction occurs when loose, saturated, granular soils lose their strength due to excess water pressure that builds up during repeated movement from seismic activity. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied

materials and post-earthquake settlement of liquefied materials. Factors that contribute to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking. The effects of liquefaction include the loss of the soil's ability to support footings and foundations which may cause buildings and foundations to buckle.

According to the California Department of Conservation's Earthquake Fault Zones and Seismic Hazard Zones Map for the Hollywood Quadrangle, the Project Site is not located within a liquefaction zone.[39] This determination is based on groundwater depth records, soil type, and distance to a fault capable of producing a substantial earthquake. Additionally, the Safety Element of the City General Plan indicates the Project Site is not located within a liquefiable area (recent alluvial deposits; ground water less than 30 feet deep).[40] Furthermore, according to the Geotechnical Investigation, the potential for liquefaction and associated ground deformations beneath the Project Site is considered remote. Therefore, with adherence to existing regulations and site-specific design recommendations, impacts related to liquefaction would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iv. Landslides?

No Impact. Landslides generally occur in loosely consolidated, wet soils and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and characterized by relatively level topography. According to the California Department of Conservation's Seismic Hazard Zones Map for the Hollywood Quadrangle, the Project Site is not located within an earthquake-induced landslide area[41] and the City General Plan Safety Element does not map the Project Site in a landslide area.[42] Additionally, according to the Geotechnical Investigation, the probability of seismically-induced landslides occurring on the Project Site is considered to be low. Development of the Project also would not include altering the existing topography of the Project Site such that steep slopes would be introduced. As such, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The Project Site is currently fully developed with buildings and surface parking areas. As such, there are no extensive open spaces with exposed topsoil. However, construction of the Project would require grading, excavation to a depth of 45 feet, and other construction activities that have the potential to disturb soils underneath the Project Site and expose these soils to rainfall and wind, which can result in soil erosion. This potential soil erosion would be reduced by the implementation of standard erosion controls during site preparation and grading

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39 California Department of Conservation, California Geological Survey. Earthquake Fault Zones and Seismic Hazards Zones Map, Hollywood 7.5 Minute Quadrangle, November 6, 2014.

40 Department of City Planning Los Angeles, Safety Element of the Los Angeles General Plan, Exhibit B, Areas Susceptible to Liquefaction in the City of Los Angeles, p. 49.

41 California Department of Conservation, California Geological Survey. Earthquake Fault Zones and Seismic Hazards Zones Map, Hollywood 7.5 Minute Quadrangle, November 6, 2014.

42 Department of City Planning Los Angeles, General Plan Safety Element, November 1996, Exhibit C, Landslide Inventory & Hillside Areas, p. 51.

activities. Specifically, all grading activities would require grading permits from LADBS, which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavation, and fills. The Project would also 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. Regarding soil erosion during Project operations, the potential is negligible since the Project Site would remain fully developed, including new landscaping to prevent soil erosion. Therefore, with compliance with applicable regulatory requirements, impacts related to substantial soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

c. Would the project be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant Impact. As discussed above, the Project Site is not located in a landslide area as mapped by the state or by the City. Upon buildout of the Project, the existing topography of the Project Site would not be substantially altered. Specifically, the Project Site would remain relatively flat and would not cause landslides. As such, no impacts related to landslides would occur, and no mitigation measures related to landslides are required.

Liquefaction-related effects include lateral spreading. As discussed above, the Project Site is not located in an identified liquefiable area and the potential for lateral spreading is considered remote. Nonetheless, Project design and construction would comply with all applicable requirements of the LADBS as well as site-specific design recommendations set forth in the Geotechnical Investigation. Therefore, with adherence to existing regulations and site-specific design recommendations, impacts related to lateral spreading would be less than significant, and no mitigation measures are required.

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the rapid and intensive withdrawal of subterranean fluids such as groundwater or oil. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring, or is planned at the Project Site. Therefore, there is no potential for ground subsidence due to withdrawal of fluid or gas at the Project Site. Thus, the Project's impact related to subsidence would be less than significant, and no mitigation measures are required.

As discussed above, the Project Site is not located within an area susceptible to liquefaction and the Geotechnical Investigation concluded that the potential for liquefaction and associated ground deformations beneath the site is very low. As such, the Project's impact related to liquefaction would be less than significant, and no mitigation measures are required.

Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading. Soil collapse occurs when the land surface is saturated at

depths greater than those reached by typical rain events.[43] According to the Geotechnical Investigation, the soils underlying the Project Site are not considered prone to soil instability. Therefore, the Project's impact related to collapse would be less than significant, and no mitigation measures are required.

Based on the above, the Project would not be located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. The impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. Due to high clay content, expansive soils expand with the addition of water and shrink when dried, which can cause damage to overlying structures. As discussed in the Geotechnical Investigation, the existing site soils encountered during the field investigation at the subterranean levels are considered to have a low expansive potential. Project design and construction would comply with all applicable requirements of LADBS for a site with underlying expansive soils as well as site-specific design recommendations set forth in the Geotechnical Investigation. Therefore, with adherence to existing regulations and site-specific design recommendations, impacts related to expansive soils would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The Project Site is located within a community served by existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would not have an impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms since the majority of species that have existed on earth from this era are extinct. PRC Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor.

[43] International Journal of Technical Innovation in Modern Engineering & Science (IJTIMES) Foundations on Collapsible and Expansive Soils: An Overview, Volume 4, Issue 4, April 2018.

Furthermore, California Penal Code Section 622.5 includes penalties for damage or removal of paleontological resources.

The Project Site is located within an urbanized area and has been subject to repeated grading and development in the past. Thus, surficial paleontological resources that may have existed at one time have likely been previously disturbed. In addition, as discussed in the Paleontological Memo included as Appendix IS-3, no paleontological resources are documented within a one-half mile radius of the Project Site. However, the Project Site is underlain by older Quaternary alluvial deposits that are late Pleistocene in age (approximately 125,000 to 11,700 years old). These elevated and dissected Pleistocene age deposits have the potential to yield paleontological resources and other resources from the same geological units that occur beneath portions of the Project Site have been documented elsewhere in the City.

According to the records search results received from the Natural History Museum of Los Angeles County (LACM), four vertebrate fossil localities, LACM 6297 through 6300, were recovered between 47 and 80 feet below the ground surface (bgs) northeast of the Project Site during excavations for the Metro B (Red) Line tunnels and stations. These localities, were along Hollywood Boulevard, between the Hollywood Freeway and Western Avenue, approximately 0.52 to 0.77 mile northeast of the Project Site, and yielded late Pleistocene paleofauna including fossil specimens of horse (Equus), bison (Bison), camel (Camelops), and mastodon (Mammut americanum). Additional localities approximately 1.45 miles to the south-southwest, near the Rancho La Brea asphalt deposits in the Hancock Park region, yielded vertebrate fossil specimens at shallower depths.[44] One such locality discovered within older Quaternary deposits is LACM 5845, located approximately 1.65 miles southeast of the Project Site, near the intersection of Western Avenue and Council Street. At this locality, a fossil mastodon (Mammutidae) was found at a depth of five to six feet bgs. Approximately 2.35 miles southeast of the project area and east-northeast of locality LACM 5845, near the intersection of Madison Avenue and Middlebury Street, locality LACM 3250 yielded a fossil specimen of mammoth (Mammuthus) at a depth of eight feet bgs. Approximately 1.89 miles southwest of the project area, near the intersection of Sierra Bonita and Oakwood Avenue, locality LACM 3371 yielded specimens of fossil bison (*Bison antiquus*) at a depth of 12 feet bgs.

Scientifically significant paleontological resources have been recovered from correlative Pleistocene old alluvial deposits elsewhere in the City and include recorded fossil collecting localities. These localities have yielded fossils of terrestrial mammals (e.g., mammoths, mastodons, ground sloths, dire wolves, sabre-toothed cats, large and small horses, large and small camels, and bison), in addition to plant macro-and micro-fossils and microvertebrate fossils.

Although no vertebrate fossils are documented within the vicinity of the project area, previously undisturbed Pleistocene age alluvial deposits, if encountered, would be conducive to preserve such remains. However, the Project would include excavations up to a maximum depth of 45 feet into the alluvial deposits. Thus, the possibility exists that paleontological artifacts that were not discovered during prior construction or other human activity may be present. The City has established a standard condition of approval to address inadvertent discovery of paleontological resources. Should paleontological resources be inadvertently encountered, the City's condition of approval provides for

[44] The exact location of this deposit was not provided. The approximate distance provided is to Hancock Park.

temporarily halting construction activities near the encounter and retaining a qualified paleontologist to assess the find and, if necessary, developing a plan for removal and treatment of the find. Overall, with adherence to the City's condition of approval to address any inadvertent discovery of paleontological resources, the Project would not directly or indirectly destroy a unique paleontological resource. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

With regard to unique geologic features, the Project Site is currently developed with three buildings and surface parking and there are no unique geologic features on the Project Site. Therefore, the Project would not directly or indirectly destroy a unique geologic feature. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially Significant Impact. Gases that trap heat in the atmosphere are called greenhouse gases since they have effects that are analogous to the way in which a greenhouse retains heat. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of greenhouse gases in the atmosphere affects the earth's temperature. The State of California has undertaken initiatives designed to address the effects of greenhouse gas emissions, and to establish targets and emission reduction strategies for greenhouse gas emissions in California. Nevertheless, activities associated with the Project, including construction and operational activities, could result in greenhouse gas emissions that may have a significant impact on the environment. Therefore, the EIR will provide further analysis of the Project's greenhouse gas emissions.

b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Potentially Significant Impact. As the Project would have the potential to emit greenhouse gases, the EIR will include further evaluation of project-related emissions and associated emission reduction

strategies to determine whether the Project conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases (e.g., Assembly Bill [AB] 32, SCAG RTP/SCS).

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. 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?	☒	☐	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☒	☐	☐	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	☒	☐	☐	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Construction of the Project would not involve the routine transport of hazardous materials to and from the Project Site. During demolition, excavation, on-site grading, and

building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be routinely used on the Project Site through the duration of construction. While some hazardous materials used during construction could require disposal, such activity would occur only for the duration of construction and would cease upon completion of the Project. As such, construction of the Project would not involve the routine disposal of hazardous materials. Notwithstanding, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, there are regulations aimed at establishing specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. The Project would be in full compliance with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials, including, but not limited to the Resource Conservation and Recovery Act (RCRA), California Hazardous Waste Control Law, Federal and state Occupational Safety and Health Acts, SCAQMD rules, and permits and associated conditions issued by LADBS. Such requirements include obtaining material safety data sheets from chemical manufacturers, making these data sheets available to employees, labeling chemical containers in the workplace, developing and maintaining a written hazard communication program, and developing and implementing programs to train employees about hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in office and commercial uses, including cleaning products, paints, and those used for maintenance of landscaping. Such use would be consistent with that currently occurring on the Project Site and other nearby developments. As a commercial office development, the Project would not involve the routine transport, use, and disposal of large quantities of hazardous materials. The Project's limited use of common hazardous materials can typically be disposed of at Class II or III landfills, which accept most common waste materials, such as those identified above. In addition, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with all applicable federal, state, and local requirements.

Based on the above, with compliance with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, the Project's impact associated with the routine transport, use, or disposal of hazardous materials during construction and operation of the Project would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Would the project 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?

Potentially Significant Impact. While operation of the Project is not expected to involve hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste, construction would require demolition of the existing uses and excavation activities. Based on the types and ages of the existing on-site structures, demolition of the existing on-site structures and excavation activities could expose certain hazardous materials including storage drums, spills, asbestos containing

materials, and/or lead-based paints, or result in other hazards to the public. Therefore, further evaluation of this topic will be included in the EIR.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Potentially Significant Impact. There is one existing school within one-quarter mile of the Project Site. Vine Street Early Education Center is located approximately 0.25 mile south of the Project Site at 6312 Eleanor Avenue. While the Project is not expected to involve hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste, further evaluation of this topic will be included in the EIR due to the proximity of the school.

d. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?

Potentially Significant Impact. The Project Site is currently developed with surface parking, three commercial buildings, and five residential bungalows and has the potential to be included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. In addition, properties in the surrounding area also have the potential to be listed on various environmental databases. Therefore, further evaluation of this issue will be included in the EIR.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The Project Site is not located within an airport land use plan or within 2 miles of a public airport or public use airport. The nearest airport is the Hollywood-Burbank Airport located approximately 7 miles north of the Project Site. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The City General Plan Safety Element addresses public protection from unreasonable risks associated with natural disasters (e.g., fires, floods, earthquakes) and sets forth guidance for emergency response. Specifically, the Safety Element includes Exhibit H, Critical Facilities and Lifeline Systems, which identifies emergency evacuation routes, or disaster routes, along with the location of selected emergency facilities. The nearest emergency/disaster routes to the Project Site are Santa Monica Boulevard (0.18 mile) to the south.[45] 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 lane closures. However, if lane closures are necessary,

[45] City of Los Angeles, Safety Element of the Los Angeles City General Plan, Critical Facilities and Lifeline Systems, Exhibit H, November 1996.

both directions of travel would continue to be maintained in accordance with standard construction traffic management plans that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. In addition, the Project would comply with Los Angeles Fire Department (LAFD) access requirements and applicable LAFD regulations regarding safety. Therefore, the Project would not impede emergency access within the Project Site or vicinity that could cause an impediment along City designated disaster routes such that the Project would impair the implementation of the City's emergency response plan. As such, the Project's impact related to the implementation of the City's emergency response plan would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Project Site is located in an urbanized area of the City and there are no wildlands located on or in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone[46] or within a City-designated fire buffer zone.[47] Accordingly, the Project would not expose people or structures to a risk of loss, injury, or death involving wildland fires. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐

[46] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 1235 Vine Street, http://zimas.lacity.org/, accessed March 9, 2021. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

[47] City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

The following analysis is based, in part, on the *1235 Vine St. Hydrology and Water Quality Report* (Hydrology Report) prepared for the Project by KPFF Consulting Engineers, dated September 2020, and included as Appendix IS-4 of this Initial Study.

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. As discussed below, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Surface Water Quality

Construction

During Project construction, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use

and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. Therefore, Project-related construction activities could potentially result in adverse effects on water quality. As Project construction would disturb less than one acre of soil, the Project would not be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (Order No. 2009-0009-DWQ, as well as its subsequent amendments 2010-0014-DWQ and 2012-0006-DWQ) pursuant to NPDES requirements. The Project would, however, be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Best Management Practices (BMPs) to be used during construction would include, but would not necessarily be limited to: erosion control, sediment control, non-stormwater management, and materials management BMPs. These BMPs will be included in an erosion control plan which is generally included as part of the construction documents and is utilized to minimize pollutant discharge during construction. With the implementation of site-specific BMPs included as part of the required erosion control plan, the Project would reduce or eliminate the discharge of potential pollutants from the stormwater runoff. In addition, the Applicant would be required to comply with City grading permit regulations, which require implementation of necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season, generally November through April), and inspection to reduce sedimentation and erosion. With compliance with these existing regulatory requirements that include specific BMPs to address surface water quality, impacts during construction would be less than significant.

Operation

As expected for most urban developments, operation of the Project has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, metals, and oil and grease. However, the Project would implement BMPs for managing stormwater runoff in accordance with the current City LID Ordinance requirements. The LID Ordinance sets the order of priority for selected BMPs, which is infiltration systems, stormwater capture and use, high efficiency biofiltration/bioretention systems, and any combination of these measures.

Based on guidelines published by LADBS, infiltration is not considered feasible at the Project Site. Specifically, LID guidelines require that infiltration systems maintain at least ten feet of clearance to the groundwater, property line, and any building structure. The historic high groundwater level at the Project Site is approximately 45 feet bgs. Thus, due to the Project's planned maximum excavation depth of 45 feet, infiltration is not considered feasible since it could not maintain the required ten feet of clearance. Therefore, the Project would be classified as a priority tier 2—capture and use. Accordingly, the Project would implement capture and use systems to collect and store the first flush of stormwater runoff to satisfy LID requirements and use it for irrigation. Based on the proposed landscape area and irrigation demands, a capture and reuse system is feasible for the Project Site. The capture and use system will be designed to comply with the most currentLID standards. Compliance with the LID requirements for the Project Site would ensure stormwater treatment with post-construction BMPs that are required to control pollutants associated with storm events up to the 85th percentile storm event, per the City's Stormwater Program.

As the Project Site currently does not have structural BMPs for the treatment of stormwater runoff from the existing impervious surfaces, implementation of the proposed BMPs would result in an improvement in surface water quality runoff from the entire Project Site. In addition, the

implementation of BMPs, which would utilize the natural adsorption and filtration characteristics of vegetated swales and pervious surfaces, would allow for more opportunities to direct stormwater to flow through the planting media where pollutants are filtered, absorbed, and biodegraded by the soil and plants, prior to reaching the ground below.

Therefore, with implementation of the BMPs described above that would be implemented in accordance with regulatory requirements, operational impacts on surface water quality would be less than significant.

Groundwater Quality

Construction

As discussed above, the Project would include excavation to an approximate depth of 45 feet below grade. The Project would also include approximately 57,675 cubic yards of export. 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. As discussed above, during on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste including, but not limited to, RCRA, California Hazardous Waste Control Law, Federal and state Occupational Safety and Health Acts, and permits and associated conditions issued by LADBS, 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. Therefore, the Project would not result in any substantial increase in groundwater contamination through hazardous materials releases and impacts on groundwater quality would be less than significant.

Operation

Operational activities which could affect groundwater quality include spills of hazardous materials and leaking underground storage tanks. The Project does not include the installation or operation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility. No underground storage tanks would be operated by the Project. In addition, while the Project would introduce more density and land uses to the Project Site which would slightly increase the use of potentially hazardous materials as described above, the Project would comply with all applicable existing regulations regarding the handling and potentially required cleanup of hazardous materials including, but not limited to, RCRA, California Hazardous Waste Control Law, Federal and state Occupational Safety and Health Acts, and permits and associated conditions issued by LADBS. Additionally, the Project would include the installation of capture and use system as a means of treatment and disposal of the volume of water produced by the greater of the 85th percentile storm or the 0.75-inch storm event, which would allow for treatment of the on-site stormwater prior to using it for irrigation. Therefore, the Project would not affect or expand any potential areas of contamination, increase the level of contamination, or cause regulatory water quality standards at an existing

production well to be violated. Therefore, the Project's potential impact on groundwater quality during operation is less than significant.

Conclusion

As discussed above, neither construction or operation of the Project would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. As provided by the following analysis, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.

Construction

As stated above, construction activities for the Project would include demolition of the existing buildings and excavation to an approximate depth of 45 feet below grade for the Project's subterranean levels. Dewatering operations may be required temporarily in order to construct the footings and the underground structure. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable regulations and requirements. Therefore, the Project would not substantially deplete groundwater supplies in a manner that would result in a net deficit in aquifer volume or lowering of the local groundwater table. Therefore, construction of the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

The Project Site is mostly impervious under existing conditions and the Project will develop hardscape and structures that cover most of the Project Site with impervious surfaces, and therefore the groundwater recharge potential will remain minimal. Specifically, the Project would increase the amount of impervious surface area on the Project Site from 91.67 to approximately 95 percent, resulting in a slight decrease in the amount of groundwater recharge occurring on-site. However, as discussed above, the Project would include the installation of structural BMPs, which would allow for treatment of the on-site stormwater prior to potential contact with the groundwater below. Furthermore, the Project would not include the installation of water supply wells and there are no existing wells or spreading ground within one mile of the Project Site. Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site;

Less Than Significant Impact. Although no streams or rivers cross the Project Site, construction activities for the Project would include excavation to a maximum of 45 feet for subterranean parking levels, as well as grading for building structures, foundations, and hardscape and landscape around the structures. It is estimated that approximately 57,675 cubic yards of export would be hauled from the Project Site. These activities have 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. Also, exposed and 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 discussed above, 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 implementation of BMPs, as described below and compliance with applicable City grading permit plan check process, the Project would not result in substantial erosion or siltation on- or off-site. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less Than Significant Impact. Existing impervious surfaces include buildings and impervious pavements for pedestrian and vehicular circulation and existing pervious surfaces include landscaped areas. Under existing conditions, stormwater sheet flows off-site. Development of the Project would include development of new buildings, paved areas, and landscaped areas, resulting in one drainage area that would drain via building roof drains, surface flow, and subterranean drainage to the proposed BMP. Upon completion, the amount of impervious surfaces would increase from 91.67 to approximately 95 percent. However, as discussed above, the Project would implement a capture and use system to comply with LID requirements. This system, which would be required to accommodate 2,627 cubic feet of stormwater, would result in a minor decrease in runoff. Specifically, stormwater flows would be reduced by approximately 0.011 cubic feet per second (cfs), a 3.93 percent reduction. Therefore, the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required

iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less Than Significant Impact. Refer to Response to Checklist Questions X.a and X.c.ii, above. As discussed in Response to Checklist Question X.a, the Project would implement capture and use systems to collect and store the first flush of stormwater runoff to satisfy LID requirements and use it for irrigation. Based on the proposed landscape area and irrigation demands, a capture and reuse system is feasible for the Project Site. The capture and use system will be designed to comply with the most current LID standards. Compliance with the LID requirements for the Project Site would

ensure stormwater treatment with post-construction BMPs that are required to control pollutants associated with storm events up to the 85th percentile storm event, per the City's Stormwater Program. As the Project Site currently does not have structural BMPs for the treatment of stormwater runoff from the existing impervious surfaces, implementation of the proposed BMPs would result in an improvement in surface water quality runoff from the entire Project Site. In addition, as discussed in Response to Checklist Question X.c.ii, upon completion, the amount of impervious surfaces on the Project Site would increase from 91.67 to approximately 95 percent. However, as also discussed above, the Project would implement a capture and use system to comply with LID requirements. This system, which would be required to accommodate 2,627 cubic feet of stormwater, would result in a minor decrease in runoff. Specifically, stormwater flows would be reduced by approximately 0.011 cubic feet per second (cfs), a 3.93 percent reduction. Therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iv. impede or redirect flood flows?

No Impact. The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City.[48,49] Thus, the Project would not impede or redirect flood flows. No impacts would occur, and no mitigation measures would be required. No further analysis of this topic in an EIR is required.

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Less Than Significant Impact. As discussed above, the Project Site is not located within a 100-year flood hazard area as mapped by FEMA or by the City. In addition, the Safety Element of the City General Plan does not map the Project Site as being located within a tsunami hazard area. Therefore, no tsunami or tsunami events would be expected to impact the Project Site. Additionally, there are no standing bodies of water near the Project Site that may experience a seiche.

Earthquake-induced flooding can also result from the failure of dams or other water-retaining structures resulting from earthquakes. According to the General Plan's Safety Element, the Project Site is located within a potential inundation area associated with the Hollywood Reservoir, which is held by the Mulholland Dam.[50] The Mulholland Dam is located in the Hollywood Hills approximately 2.0 miles north of the Project Site. Although the Project Site is mapped within an inundation zone for the dam, catastrophic failure of this dam is expected to be a very unlikely event in that dam safety regulations exist and are enforced by the Division of Safety of Dams, Army Corp of Engineers, and the Department of Water Resources. Inspectors would require dam owners to perform work, maintenance or implement controls if issues are found with the safety of the dam. The dams are

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48 Federal Emergency Management Agency, FEMA Flood Map Service Center: Search By Address, https://msc.fema.gov/portal/search?AddressQuery=1235%20Vine%20Street%2C%20Los%20Angeles%20CA, accessed July 29, 2020.

49 City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit F, p. 57.

50 City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G, p. 59.

under continuous monitoring for safety against failure and the potential for seismically-induced flooding to affect the Project Site due to dam failure is low. Therefore, the risk of flooding from inundation by dam failure is considered low.

Additionally, as discussed above, the Project would include new structural BMPs throughout the Project Site which would reduce the amount of pollutants entering the stormwater system and groundwater in the unlikely event of inundation of the Project Site. Impacts would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As discussed above, Project construction could result in erosion of exposed and stockpiled soils, increased pollutant loading due to on-site watering activities, and pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel. However, 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. BMPs to be used during construction would include, but would not necessarily be limited to: erosion control, sediment control, non-stormwater management, and materials management BMPs. These BMPs will be included in an erosion control plan which is generally included as part of the construction documents and is utilized to minimize pollutant discharge during construction. With the implementation of site-specific BMPs included as part of the required erosion control plan, the Project would reduce or eliminate the discharge of potential pollutants from the stormwater runoff. In addition, the Applicant would be required to comply with City grading permit regulations, which require implementation of necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspection to reduce sedimentation and erosion. With compliance with these existing regulatory requirements that include specific BMPs to address surface water quality, impacts during construction would be less than significant.

Potential pollutants generated by the Project during operation would include sediment, nutrients, pesticides, trash and debris, oil and grease, and metals typical of urban developments. However, the implementation of BMPs required by the City's LID Ordinance would reduce the amount of these pollutants entering the stormwater. Additionally, since the existing Project Site does not have any structural or LID BMPs to treat or infiltrate stormwater, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. As such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans.

With respect to groundwater, as discussed above in Checklist Question X.b, the Project would not result in impacts related to groundwater recharge or interfere with sustainable groundwater management of the basin.

Therefore, with compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a

sustainable groundwater management plan. Impacts would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☒	☐
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐

a. Would the project physically divide an established community?

Less than Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is located within a generally commercial and residential area and is bounded by the Villa Elaine Apartments to the north, retail uses and the Hollywood Mental Health Center to the east, the Taglyan Cultural Complex (an event venue) to the south, along with single- and multi-family residential buildings to the west. Existing buildings on the Project Site include three commercial buildings and five residential bungalows totaling approximately 26,484 square feet.

As part of the Project, three commercial buildings and five residential bungalows, totaling 26,484 square feet, would be demolished to accommodate the Project. All proposed development would occur within the boundaries of the Project Site, and the Project would not require the vacation of any surrounding streets adjacent to the Project Site. The Project includes the merger of a 1,012 square foot alley that runs parallel to Vine Street and is accessible from La Mirada Avenue. However, this ally does not currently provide through access and serves as parking for the existing uses. The proposed mixed-use, office development would also be consistent with the uses already on the Project Site and immediately surrounding the Project Site. In addition, the Project does not propose a freeway or other large infrastructure that would divide the existing surrounding community. Therefore, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project requires several discretionary approvals. While the Project would not be anticipated to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, the EIR will provide further analysis of the Project's consistency with

applicable land use plans, policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. No mineral extraction operations currently occur on the Project Site. The Project Site is located within an urbanized area and has been previously disturbed by development. As such, the potential for mineral resources to occur on-site is low. In addition, the Project Site is not located within a mineral producing area as classified by the California Geological Survey.[51] The Project Site is also not located within a City-designated oil field or oil drilling area.[52] Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site, and, as such, no impact would occur. No further analysis of this topic in the EIR is required.

b. Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geological Survey. The Project Site is also not located within a City designated oil field or oil drilling area. Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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[51] California Geological Survey, Aggregate Sustainability in California, Fifty-Year Aggregate Demand Compared to Permitted Aggregate Reserves, 2018.

[52] City of Los Angeles Department of Public Works, Bureau of Engineering, NavigateLA, http://navigatela.lacity.org/navigatela/, accessed March 9, 2021

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact. Noise sensitive uses near the Project Site include residences, a theater, and a church. During construction activities associated with the Project, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate noise on a short-term basis. In addition, noise levels from on-site sources including, but not limited to, the parking garage and mechanical equipment may increase during operation of the Project. Furthermore, traffic attributable to the Project has the potential to increase noise levels along adjacent roadways. Therefore, further evaluation of this topic will be provided in the EIR.

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Construction of the Project could generate groundborne noise and vibration associated with demolition, site grading and excavation, other clearing activities, the installation of building footings, and construction truck travel. As such, the Project would have the potential to generate excessive groundborne vibration and noise levels during short-term construction activities. Therefore, further evaluation of this topic will be provided in the EIR, including an analysis of potential impacts to the historic Villa Elaine apartments adjacent to the Project Site.

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use

airport, would the project expose people residing or working in the project area to excessive noise levels?

Less Than Significant Impact. The Project Site is not located within the vicinity of a private airstrip or within two miles of a public airport or public use airport. The nearest airport is the Hollywood-Burbank Airport located approximately 7 miles north of the Project Site. Therefore, the Project would not expose people residing or working in the Project area to excessive airport noise. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

a. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. The Project would include the construction of new office, restaurant, and/or retail uses. Since the Project does not propose a housing component, it would not directly induce a new residential population which would contribute to population growth in the vicinity of the Project Site or the Hollywood Community Plan area.

While construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project which could induce substantial population growth.

As previously discussed, the Project would include the development of 117,150 square feet of total area consisting of approximately 109,190 square feet of office uses, and 7,960 square feet of retail and/or restaurant uses. As part of the Project, three commercial buildings and five residential bungalows, totaling 26,484 square feet, would be demolished to accommodate the Project. Based on employee generation factors from the City of Los Angeles Department of Transportation (LADOT), the

Project is estimated to generate a net increase of 447 new employees on the Project Site.[53] Using employment data from the 2020–2045 RTP/SCS, an estimated 1,937,555 employees are projected within the City of Los Angeles in 2025, the Project's buildout year, with 39,669 new employees between 2021 and 2025. The Project would represent 0.02 percent of the total number of employees in 2025 and 1.13 percent of the growth between 2021 and 2025. As noted above, the Project would not introduce new homes at the Project Site and would therefore not result in a direct population growth in the area and the number of jobs would be consistent with both SCAG's 2020–2045 RTP/SCS. While some of the new employment positions could be filled by persons who would relocate to the vicinity of the Project Site, this potential increase in population would not be substantial since not all employees would move close to the Project Site. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project Site and other persons would commute to the Project Site from other communities in and outside of the City. Therefore, given that the Project would not directly contribute to substantial population growth in the Project area through the development of residential uses and as some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site or who would commute to the Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Further, as the Project would be located in a highly developed area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth. Based on the above, the Project would not induce substantial population or housing growth. Impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Less Than Significant Impact. The Project Site is currently developed with three commercial buildings and five residential bungalows totaling 26,484 square feet. Based on the City's general household size factor of 2.41 persons per household, the 5 residential bungalows could house approximately 12 people.[54] This estimate is conservative because the bungalows are one-bedroom units and the actual number of existing persons may be lower than that estimated by the use of the City's general household rate. Nevertheless, the Project would displace 5 existing residential units and the associated residents of those units.

While the Project would displace existing residents, the displacement of 5 residential units would not be substantial requiring the construction of replacement housing elsewhere. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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53 Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.

54 Based on a rate of 2.41 persons per multi-family unit based on persons per multi-family unit based on 2018 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.

XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?

Less Than Significant Impact. The Project Site and the surrounding area are currently served by LAFD Fire Station 27, located at 1327 North Cole Avenue (approximately 0.3 mile northeast of the Project Site). The Project Site is also served by Fire Station 41 located at 1439 North Gardner Street (approximately 1.8 miles west of the Project Site), Fire Station 52 located at 4957 Melrose Avenue (approximately 1.8 miles southeast of the Project Site), Fire Station 82 located at 5769 Hollywood Boulevard (approximately 1.2 miles northeast of the Project Site), and Fire Station 35 located at 1601 North Hillhurst Avenue (approximately 2.8 miles northeast of the Project Site).[55] Based on the response distance from existing fire stations, LAFD considers fire protection to be adequate.[56]

Project construction could potentially impact the provision of LAFD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. While construction activities would primarily be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures, roadway/access improvements, and the construction of utility line connections. Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and

[55] Written correspondence from Kristin Crowley, Fire Marshal, Los Angeles Fire Department February 26, 2021. See Appendix IS-5 of this Initial Study.

[56] Written correspondence from Kristin Crowley, Fire Marshal, Los Angeles Fire Department February 26, 2021. See Appendix IS-5 of this Initial Study.

construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, Project construction activities could temporarily increase response times along adjacent streets due to travel time delays caused by traffic during the Project's construction phase. However, construction-related traffic, including hauling activities and construction worker trips, would occur outside the typical weekday commuter morning and afternoon peak periods, thereby reducing the potential for traffic-related conflicts. In addition, a construction traffic management plan would be implemented during Project construction to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Project would also employ temporary traffic controls, such as flag persons, to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Since emergency access to the Project Site would remain unobstructed during construction of the Project, impacts related to LAFD emergency access would be less than significant.

As previously discussed, the Project would result in development of 117,150 square feet of floor area on the Project Site and would result in a net increase of 447 employees.[57] As the Project would increase the building area and daytime population of the Project Site compared to existing conditions, the Project would increase the demand for LAFD fire protection services. However, the proposed uses would be similar to existing uses within and immediately adjacent to the Project Site and would be expected to generate a range of fire service calls similar to what occurs under existing conditions. The Project would not include any unique or especially hazardous uses, such as industrial facilities, that use or generate large quantities of hazardous and/or toxic materials that could pose an extreme risk of serious accident or fire at the Project Site. The types of fires that could potentially occur within the Project Site would be adequately suppressed with the fire equipment found at the fire stations nearest the Project Site. Additionally, the Project would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc., including as required by LAFD. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit.

Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment resulting from the Project. As such, compliance with Fire Code requirements would minimize the potential for incidents requiring an emergency response by LAFD and therefore reduce the need for a new fire station, or the expansion, consolidation, or relocation of an existing fire station.

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[57] Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.

Vehicular access to the Project Site, including access for emergency vehicles, would be provided along La Mirada Avenue. Project-related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by traffic. However, the area surrounding the Project Site includes an established street system, consisting of freeways, primary and secondary arterials, and collector and local streets, which provide regional, sub-regional, and local access and circulation within the Project vicinity. Based on the Project Site's location within an urbanized area of the City, the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature. Therefore, the street system surrounding the Project Site is not considered substandard. In addition, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the increase in traffic generated by the Project would not significantly impact emergency vehicle access to the Project Site and surrounding area. Furthermore, the Project's driveways and internal circulation would be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access. As such, emergency access to the Project Site and surrounding uses would be maintained and Project-related traffic is not anticipated to impair the LAFD from responding to emergencies at the Project Site or the surrounding area.

Based on the above, the Project operation would not require the addition of a new fire station or the expansion of an existing facility in order to maintain service. Therefore, operation of the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities (fire protection), the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection services. Project impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

b. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?

Less Than Significant Impact. The Project Site and the surrounding area are currently served by the Los Angeles Police Department's (LAPD) West Bureau and the Hollywood Community Police Station, located at 1358 North Wilcox Avenue (approximately 0.28 mile northwest of the Project Site).[58] As previously noted, the Project does not include the development of residential uses. Therefore, the Project would not directly affect the existing officer-to-resident ratio within LAPD's West Bureau. However, the Project would introduce a new employee and visitor population to the Project

[58] Los Angeles Police Department, Community Police Station Address Look Up, http://lapdonline.org/inside_the_lapd/content_basic_view/41960/West+Bureau/Hollywood/6A67/666/1588192483, accessed March 9, 2021.

Site, which could result in an indirect demand for police services. These employment opportunities would include a range of full-time and part-time positions, which may be filled, in part, by employees already residing in the vicinity of the Project Site and who are already included in the residential population of the LAPD's West Bureau. Other positions may be filled by persons who would commute and who would not relocate their place of residence as a result of working at the Project Site. Overall, given the LAPD's metrics for evaluating service capacity based on residential population, the Project's increase in the police service population would not affect the officer-to-resident ratio for LAPD's West Bureau and the officer-to-resident ratio would remain at its current level. Nevertheless, in its letter dated November 20, 2020, LAPD concluded a project of this size could have a minor impact on police services in Hollywood.[59]

However, the Project would incorporate security features to reduce the demand for police protection services. These features would include sufficient lighting throughout the Project Site to ensure safety and visibility and well illuminated entryways, walkways, lobbies, and parking areas to eliminate areas of concealment. Additionally, as recommended by LAPD, prior to the issuance of a building permit, the Applicant would submit the Project plans to LAPD for review regarding the incorporation of feasible crime prevention features as well as access routes and other information that might facilitate police response. In addition to the implementation of these design features, which would help offset the Project-related increase in demand for police services, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate. Overall, the Project would not generate a demand for additional police protection services that would exceed the LAPD's capacity to serve the Project Site. Therefore, Project operation would not necessitate the provision of new or physically altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain LAPD's capability to serve the Project Site. Impacts to police protection services would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

c. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools?

Less Than Significant Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). LAUSD is divided into six local districts.[60] The Project Site is located in Local District–West.[61] As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of students within the service area of LAUSD from the introduction of a residential population. In addition, not all new employees of the Project would relocate to the vicinity of the Project Site, which could otherwise trigger a demand for new or expanded school facilities.

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59 Written correspondence from Aaron C. Ponce, Community Outreach and Development Division, Los Angeles Police Department November 20, 2020. See Appendix IS-6 of this Initial Study.

60 Los Angeles Unified School District, Local District Maps 2015–2016, http://achieve.lausd.net/Page/8652, accessed March 9, 2021.

61 Los Angeles Unified School District, Local District—West Map, May 2015.

Furthermore, even if there were new school facilities that would need to be built, pursuant to Government Code Section 65995, the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Therefore, impacts to schools would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

d. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for park services?

Less Than Significant Impact. Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. Nearby parks and recreational facilities within an approximate 2-mile radius of the Project Site include: Hollywood Recreation Center (located 0.20 mile southwest of the Project Site); De Longpre Park (located 0.50 mile northwest of the Project Site); Selma Park (located 0.56 mile northwest of the Project Site); Carlton Way Park (located 0.67 mile northeast of the Project Site); Seily Rodriguez Park (located 0.74 mile east of the Project Site); Yucca Community Center and Yucca Park (located 0.85 mile northwest of the Project Site); Las Palmas Senior Citizen Center (located 0.94 mile northwest of the Project Site); La Mirada Park (located 1.14 miles east of the Project Site); Dorothy & Benjamin Smith Park (located 1.15 miles northwest of the Project Site); Burns Park (located 1.38 miles southeast of the Project Site); Poinsettia Recreation Center (located 1.39 miles southwest of the Project Site); Lemon Grove Recreation Center (located 1.39 miles southeast of the Project Site); Runyon Canyon Park (located 1.52 miles northwest of the Project Site); Wattles Garden Park (located 1.79 miles northwest of the Project Site); Barnsdall Art Park (located 1.94 miles northeast of the Project Site); and Pan Pacific Park (located 2.00 miles southwest of the Project Site).[62]

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create a demand for parks. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks. In addition, Project employees would be more likely to use parks near their homes during non-work hours. Furthermore, the Project proposes on-site open space amenities such as landscaped courtyards with seating for use by employees, reducing the likelihood employees would use local parks. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks or the need for new or physically

[62] City of Los Angeles Department of Recreation and Parks, Facility Map Locator, www.laparks.org/maplocator?cat_id=All&geo[radius]=2&geo[latitude]=34.0935504&geo[longitude]=-118.3268358&address=1235%20Vine%20St,%20Los%20Angeles,%20CA%2090038,%20USA, accessed March 9, 2021.

altered parks. Impacts would be less than significant, and no mitigation measures are required. No further analysis of the issue in an EIR is required.

e. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?

Less Than Significant Impact. Other public facilities available include libraries. The Los Angeles Public Library (LAPL) provides library services to the City through its Central Library, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through web-based resources.[63] The Project area is served by existing libraries within the Hollywood Community Plan area, including the John C. Fremont Branch Library, located 0.78 mile southwest of the Project Site.[64]

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of residents within the service population of the John C. Fremont Branch Library. In addition, Project employees would have internet access to LAPL and other web-based resources, decreasing the demand on library facilities. Furthermore, as Project employees would be more likely to use library facilities near their homes during non-work hours and given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library services. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities or the need for new or physically altered library facilities. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐

63 Los Angeles Public Library, Los Angeles Public Library Strategic Plan 2015–2020.

64 Los Angeles Public Library, Locations and Hours, www.lapl.org/branches?distance%5Bpostal_code%5D=90038&distance%5Bsearch_distance%5D=2&distance%5Bsearch_units%5D=mile&field_branch_resources_services_tid=All, accessed March 9, 2021.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

a. Would the project 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?

Less Than Significant Impact. The Project does not propose the development of residential uses which would create a demand on nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create a demand for parks and recreational facilities. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks and recreational facilities. The Project would also include on-site amenities such as outdoor terraces on Levels 2, 4, 6, 7, and 8 which would provide seating, lounge areas, and landscaping. In addition, Project employees would be more likely to use parks near their homes during non-work hours. Therefore, 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. The impact on parks and recreational facilities would be less than significant, and mitigation measures would not be required. No further evaluation of this topic in an EIR is required.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The Project does not include any residential uses and therefore would not result in any direct substantial population growth that would increase use of existing recreational facilities. Therefore, the Project would not necessitate construction of new recreational facilities. Therefore, no impact would occur, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☒	☐	☐	☐
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☒	☐	☐	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

a. Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Potentially Significant Impact. Operation of the proposed uses would generate vehicle and transit trips throughout the day. The resulting increase in the use of the area's roadways could conflict with an applicable plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Therefore, further analysis of this issue will be provided in the EIR.

b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Potentially Significant Impact. SB 743, which went into effect in January 2014, requires the Governor's Office of Planning and Research to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis has shifted from driver delay, which is typically measured by traffic level of service (LOS), to a new measurement that better addresses the state's goals on reduction of greenhouse gas emissions, creation of a multi-modal transportation, and promotion of mixed-use developments. CEQA Guidelines Section 15064.3 states that vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts, replacing LOS.

On July 30, 2019, the City adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its *Transportation Assessment Guidelines* (July 2019), which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743. The *Transportation Assessment Guidelines* were updated in July 2020.

The Project would develop new office and commercial uses on the Project Site. As a result, VMT would increase over existing conditions. Therefore, further analysis of this issue will be provided in the EIR.

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. The Project Site is located in a highly urbanized area developed with roadways and infrastructure. All access and circulation associated with the Project would be designed and constructed in conformance with all applicable requirements established by LADBS, LAFD, and the LAMC. The Project would not include any new roads that would result in an increase in hazards due to a design feature. As noted above, primary vehicular access to the Project Site would be provided via a two-way driveway along La Mirada Avenue that would provide access to the building's parking garage. A driveway providing access to the transformer and mechanical equipment areas would also be located along La Mirada Avenue. As such, the number of curb cuts on the Project Site would be reduced from three to two. In addition, the Project would not result in incompatible uses as the proposed uses are consistent with the types of commercial and office uses already present in the surrounding area. Thus, impacts related to increased hazards due to a design feature or incompatible use would be less than significant, and no further analysis of this topic in the EIR is required.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. The City General Plan Safety Element addresses public protection from unreasonable risks associated with natural disasters (e.g., fires, floods, earthquakes) and sets forth guidance for emergency response. Specifically, the Safety Element includes Exhibit H, Critical Facilities and Lifeline Systems, which identifies emergency evacuation routes, or disaster routes, along with the location of selected emergency facilities. The nearest emergency/disaster route to the Project Site is Santa Monica Boulevard (0.18 mile) to the south.[65]

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 lane closures. However, if lane closures are necessary, both directions of travel would continue to be maintained in accordance with standard construction traffic management plans that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. Therefore, the Project would not result in inadequate emergency access. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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[65] City of Los Angeles, Safety Element of the Los Angeles City General Plan, Critical Facilities and Lifeline Systems, Exhibit H, November 1996.

XVIII. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☒	☐	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Potentially Significant Impact (a and b). Approved by Governor Jerry Brown on September 25, 2014, AB 52 establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in PRC Section 21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days

of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As noted above, the Project would require grading, excavation, and other construction activities that could have the potential to disturb existing but undiscovered tribal cultural resources. Therefore, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with AB 52, the City will notify all applicable tribes, and the City will participate in any requested consultations for the Project. Further analysis of this topic will be provided in the EIR.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☒	☐	☐	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☒	☐	☐	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Potentially Significant Impact (Water, Electric Power, and Natural Gas)/Less Than Significant Impact (Wastewater, Stormwater, and Telecommunications Facilities). Water, wastewater, electric power, and natural gas systems consist of two components, the source of the supply or place of treatment (for wastewater), and the conveyance systems (i.e., distribution lines and mains) that link the location of these facilities to an individual development site. Given the Project's increase in the amount of developed floor area on the Project Site and the potential corresponding increase in water, electricity, and natural gas demand, further analysis of this issue in an EIR will be provided. Wastewater and telecommunications facilities are analyzed below. Stormwater is analyzed under Section X, Hydrology and Water Quality, above.

Wastewater

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Water Reclamation Plant (HWRP). The HWRP has a capacity of 450 million gallons per day (mgd),[66] and current average wastewater flows are at approximately 275 mgd.[67] Accordingly, the remaining available capacity at the HWRP is approximately 175 mgd. As shown in Table 1 on page 71, the Project would generate a net increase in wastewater flow from the Project Site of approximately 21,636 gallons per day (gpd), or approximately 0.02 mgd. The Project's increase in average daily wastewater flow of 0.02 mgd would represent approximately 0.01 percent of the current estimated 175 mgd of remaining available capacity at the HWRP. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the HWRP. Furthermore, wastewater flows would be typical of office and commercial developments which are currently treated by HWRP and no industrial discharge into the wastewater system would occur. Furthermore, discharge of effluent from the HWRP into Santa Monica Bay is also regulated by permits issued under the NPDES and is required to meet Los Angeles Regional Water Quality Control Board (LARWQCB) requirements. As LA Sanitation (LASAN) monitors the treated wastewater, and because the wastewater generated by the Project would be similar to wastewater currently treated at HWRP, wastewater generated from the Project Site would not exceed wastewater treatment requirements of LARWQCB.

The Project is anticipated to utilize existing sewer infrastructure. The sanitary sewer connections to the proposed buildings is expected to come from the existing 33-inch sewer line in Vine street and the 8-inch sewer line in La Miranda Avenue. The 33-inch sewer line has a capacity of 65.335 cfs or 42,227,113.6 gpd, and the 8-inch sewer line has a capacity of 0.70968 cfs or 458,678.2 gpd. As stated above, and confirmed by LASAN in its WWSI dated January 25, 2021 (included as Appendix IS-7 of this Initial Study), the Project's net increase in wastewater generation is approximately 21,636 gpd. As required by LAMC Section 64.15, the Project has submitted a Sewer Capacity Availability Request to LASAN to evaluate the capability of the existing wastewater system and obtain approval to discharge the Project's wastewater to the existing 33-inch sewer line in Vine Street and the 8-inch line in La Miranda Avenue. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for the Project during the Project's permitting process. In addition, Project-related sanitary sewer connections and

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66 LASAN, Water Reclamation Plants, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=vm8qwyj80_4&_afrLoop=18606279438697733#!, accessed March 9, 2021.

67 LASAN, Water Reclamation Plants, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=vm8qwyj80_4&_afrLoop=18606279438697733#!, accessed March 9, 2021.

Table 1
Estimated Project Wastewater Generation

Land Use	Floor Area	Wastewater Generation Rate (gpd/unit)[a]	Wastewater Generation (gpd)
EXISTING			
Bar: Cocktail, Public Table Area (5,658 sf)	283 seats	15 gpd/seat	4,245
Commercial/Retail Space	4,221 sf	0.025 gpd/sf	106
Warehouse	11,620 sf	0.03 gpd/sf	349
Residential: SFD—2 BR	5 units	185 gpd/du	925
Auto Parking	4,985 sf	0.02 gpd/sf	100
Existing Subtotal			5,725
PROPOSED			
Restaurant: Full-Service Indoor Seat (7,960 sf)[b]	398 seats	30 gpd/seat	11,940
Parking Structure	115,900 sf	0.02 gpd/sf	2,318
Office Building	109,190 sf	0.12 gpd/sf	13,103
Proposed Wastewater Generation			**27,361**
Less Existing to Be Removed			*(5,725)*
Net Additional Wastewater Generation (Proposed – Existing to Be Removed)			**21,636**

sf = square feet

gpd = gallons per day

[a] *Wastewater generation rates are based on 2012 LASAN Sewer Generation Rates.*

[b] *Conservatively assumes 1 seat = 20 square feet.*

Source: LASAN, January 25, 2021. Refer to Appendix IS-7 of this Initial Study.

on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Therefore, the Project would not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained.

Based on the above, the Project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Therefore, impacts would be less than significant, and mitigation measures are not required. No further analysis of this topic in an EIR is required.

Stormwater

As discussed above in Response to Checklist Question X.c.ii, the Project would not alter the amount of impervious surface area and stormwater flows. As such, the Project would not require or result in the relocation or construction of new or expanded stormwater drainage. Based on the above, the Project would not require or result in the construction of new stormwater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental

effects. Therefore, impacts would be less than significant, and mitigation measures are not required. No further analysis of this topic in an EIR is required.

Telecommunications Facilities

The Project would require construction of new on-site telecommunications infrastructure to serve new buildings and potential upgrades and/or relocation of existing telecommunications infrastructure. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. However, the Project would ensure vehicle and pedestrian access is maintained throughout construction. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration (i.e., months) and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers and the City as applicable. As such, the Project would not require or result in the relocation or construction of new or expanded telecommunications facilities. Impacts would be less than significant and no further evaluation of this topic in an EIR is required.

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Potentially Significant Impact. LADWP supplies water to the Project Site. Given the Project's increase in the amount of developed floor area on the Project Site, the Project has the potential to result in increased demand for water provided by LADWP. Therefore, further analysis of this issue will be provided in the EIR.

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As shown in Table 1 on page 71, the Project would generate a net increase in wastewater flow from the Project Site of approximately 21,636 gpd, or approximately 0.02 mgd. The Project's increase in average daily wastewater flow of 0.02 mgd would represent approximately 0.01 percent of the current 175 mgd of remaining available capacity of the HWRP.[68] Therefore, wastewater generated by the Project would be accommodated by the existing capacity of the HWRP.

Various factors, including future development of new treatment plants, upgrades and improvements to existing treatment capacity, development of new technologies, etc., will ultimately determine the available capacity of the Hyperion Service Area in 2025, the year by which construction of the Project is expected to be completed. Planned upgrades would provide for improvements beyond 2040 to serve future population needs. However, it is conservatively assumed that no new improvements to

[68] (0.02 mgd / 175 mgd) x 100 = 0.01%

the wastewater treatment plants would occur prior to 2025. Thus, based on this conservative assumption, the capacity of the HWRP in 2025 would continue to be 450 mgd.

Based on LASAN's average flow projections for the HWRP, it is anticipated that average flows in 2024, the Project build-out year, would be approximately 265.5 mgd.[69] Accordingly, the future remaining available capacity in 2025 would be approximately 184.5 mgd.[70] The Project's increase in average daily wastewater flow of 0.02 mgd would represent approximately 0.01 percent of the estimated future remaining available capacity of 184.5 mgd at the HWRP.[71] Therefore, wastewater generated under the Project would be accommodated by the future capacity of the HWRP.

Additionally, the Project's net increase in average daily wastewater generation of 0.02 mgd plus the current average flows of approximately 275 mgd to the HWRP would represent approximately 61.1 percent[72] of the HWRP's capacity of 450 mgd. With regard to future flows, the Project's net increase of 0.02 mgd plus the projected flows of approximately 263.6 mgd to the HWRP would also represent approximately 58.6 percent[73] of the HWRP's assumed future capacity of 450 mgd.

Based on the above, there is adequate treatment capacity to serve the Project's projected demand in addition to existing LASAN commitments. As such, the Project would result in a determination by the wastewater treatment provider, which serves or may serve the Project, that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. While the Bureau of Sanitation generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County of Los Angeles (County) are categorized as either Class III or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in inert waste landfills.[74] Nine Class III landfills

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69 Los Angeles Department of Water and Power, One Water LA 2040 Plan—Volume 2, Table ES.1, Projected Wastewater Flows. Based on a straight-line interpolation of the projected flows for the Hyperion Water Reclamation Plant for 2020 (approximately 256 mgd) and 2030 (approximately 275 mgd). The 2025 value is extrapolated from 2020 and 2030 values: [(275 mgd – 256 mgd) ÷ 10) * 5] + 256 = ~ 265.5 mgd.

70 450 mgd – 265.5 mgd = 184.5 mgd

71 (21,636 gpd ÷ 184.5 mgd) x 100 = 0.01 (~0.01%)

72 [(21,636 gpd + 275 mgd) ÷ 450 mgd] x 100 = 61.12 (~ 61.1%)

73 [(21,636 gpd + 263.6 mgd) ÷ 450 mgd] x 100 = 58.58 (~ 58.6%)

74 Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

and one inert waste landfill with solid waste facility permits are currently serving the County.[75] In addition, there is one solid waste transformation facility within the County that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery.

Based on 2019 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the most recent report available, the total remaining permitted Class III landfill capacity in the County is estimated at 148.4 million tons. The permitted inert waste landfill serving the County is Azusa Land Reclamation. This facility currently has 58.84 million tons of remaining capacity and an average daily in-County disposal rate of 854 tons per day.[76] The County continually evaluates landfill disposal needs and capacity through preparation of the CoIWMP Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.[77]

Additionally, the City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan sets a goal of becoming a "zero waste" city by 2030. To this end, the City implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling.[78] The City is currently diverting 76 percent of its waste from landfills.[79] The City has adopted the goal of achieving 90 percent diversion by 2025, and zero waste by 2030.

The following analysis quantifies the Project's construction and operation solid waste generation.

Construction

As previously discussed, construction of the Project would include the removal of two commercial buildings and five residential bungalows, totaling 26,484 square feet to accommodate the development of 117,150 square feet of floor area consisting of approximately 109,190 square feet of office uses and 7,960 square feet or retail and/or restaurant space. 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 non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within the County and within the Class III landfills open to the City. Furthermore, pursuant to LAMC Sections 66.32 through 66.32.5

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75 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020. The 9 Class III landfills serving the County include the Antelope Valley Landfill, the Burbank Landfill, the Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, Savage Canyon Landfill, the Scholl Canyon Landfill, and the Sunshine Canyon City and County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

76 County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.

77 County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.

78 LA Sanitation, Solid Waste Integrated Resource Plan FAQ; www.zerowaste.lacity.org/files/info/fact_sheet/SWIRP FAQS.pdf, accessed July 29, 2020.

79 LA Sanitation, Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=alxbkb91s_4&_afrLoop=18850686489149411#!, accessed July 29, 2020.

(Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. Thus, although the total diversion rate may ultimately exceed 75 percent, this analysis conservatively assumes a diversion rate of 75 percent.

As shown in Table 2 on page 76, based on construction and debris rates established by the United States Environmental Protection Agency and after accounting for mandatory recycling, the Project would generate approximately 545 tons of construction-related waste. It should be noted that soil export is not typically included in the calculation of construction waste to be landfilled since soil is not disposed of as waste but, rather, is typically used as a cover material or fill at other construction sites requiring soils import. Given the remaining permitted capacity at the Azusa Land Reclamation facility, which is approximately 58.84 million tons, as well as the remaining 148.4 million tons of capacity at the Class III landfills serving the County, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

Based on the above, Project construction would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, construction impacts to solid waste facilities would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

As shown in Table 3 on page 77, upon full buildout, the Project would result in a net increase in solid waste generation of approximately 181 tons per year. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures, such as compliance with AB 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.[80]

The estimated net increase in solid waste that would be generated by the Project represents approximately 0.0001 percent of the remaining capacity (148.4 million tons) for the Class III landfills serving the County.[81]

The County will continue to address landfill capacity through the preparation of CoIWMP annual reports. The preparation of each annual report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Solid waste disposal is an essential public service that must be provided without interruption in order to protect public health and safety, as well as the

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[80] LA Sanitation, Solid Waste Integrated Resources Plan, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?_afrLoop=3608041245788654&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=8vrc5bges_179#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D3608041245788654%26_afrWindowMode%3D0%26_adf.ctrl-state%3D8vrc5bges_183, accessed March 9, 2021.

[81] (181 tons per year/148.4 million tons) x 100 ≈ 0.0001%

Table 2
Project Demolition and Construction Waste Generation

Building	Size	Generation Rate (lbs/sf)[a]	Total (tons)
Construction Waste			
Office	109,190 sf	3.89	212
Restaurant/Retail	7,960 sf	3.89	15
Construction Waste Subtotal			*228*
Demolition Waste			
Commercial	21,499 sf	155	1,666
Residential	4,985 sf	115	287
Demolition Waste Subtotal			654
Total for Construction and Demolition Waste			***2,181***
Total After 75-Percent Recycling			**545**

lbs = pound

sf = square feet

[a] *U.S. Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Tables 3, 4 5, and 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types.*

Source: Eyestone Environmental, 2021.

environment. Jurisdictions in the County continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning directives. These efforts, together with countywide and regional programs implemented by the County and the cities, acting in concert or independently, have achieved significant, measurable results, as documented in the 2019 Annual Report. As discussed below, the Project would be consistent with and would further City policies that reduce landfill waste streams. Such policies and programs serve to implement the strategies outlined in the 2019 Annual Report to adequately meet countywide disposal needs through 2034 without capacity shortages.

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste that would be generated by the construction and operation of the Project. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

Table 3
Estimated Project Solid Waste Generation

Building	Size	Employee Generation Rate per ksf[a]	Estimated Number of Employees	Solid Waste Generation Rate[b]	Total Generation (tons/year)
Existing					
Commercial	21,499 sf	2	43 emp	2.98 tn/emp/yr	128
Residential (4,985 sf)	5 du	N/A	N/A	2.23 tn/du/yr	11
Total Existing					**139**
Proposed					
Office	109,100 sf	4	437 emp	0.37 tn/emp/year	162
Restaurant/Retail	7,960 sf	6.7[c]	53 emp	2.98 tn/emp/year	159
Total Proposed					**321**
Total Net Increase					**181**

du = dwelling units

emp = employees

tn = tons

sf = square feet

[a] *Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.*

[b] *Non-residential yearly solid waste generation factors from LASAN City Waste Characterization and Quantification Study, Table 4, July 2002. Assumes rate of 0.37 tons per employee per year (Services—Business) for office uses.*

[b] *Conservatively assumes 100% of the restaurant/retail uses would be fast-food, which has the highest employee generation rate.*

Source: Eyestone Environmental, 2021.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management in California is primarily guided by AB 939, the California Integrated Waste Management Act of 1989, which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in “zero waste” by 2030. The plan

also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste generated per week.[82] Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services.

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's Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.[83] 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. Since the Project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

[82] Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

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

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

b. Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact (a-d). As discussed above, the Project Site is located in an urbanized area, and there are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone,[84] nor is it located within a City-designated fire buffer zone.[85] Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. No impacts regarding wildfire risks would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐

[84] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 1235 Vine Street, http://zimas.lacity.org/, accessed March 9, 2021. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

[85] City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☒	☐	☐	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Potentially Significant Impact. As discussed above, the Project is located in a highly urbanized area and does not serve as habitat for fish or wildlife species. In addition, no sensitive plant or animal community or special status species occur on the Project Site. Therefore, the Project would not have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal.

As discussed above, the Project's potential environmental impacts for the following subject areas will be further analyzed in the EIR: air quality; cultural resources; energy; greenhouse gas emissions; land use and planning; noise; transportation; tribal cultural resources; and water supply.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Potentially Significant Impact. The potential for cumulative impacts occurs when the impacts of the Project are combined with impacts from related development projects and result in impacts that are greater than the impacts of the Project alone. Located in the vicinity of the Project Site are other current and reasonably foreseeable projects, the development of which, in conjunction with that of the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in the EIR for the following subject areas: air quality; cultural resources; energy; greenhouse gas emissions; land use and planning; noise; transportation; tribal cultural resources; and water supply.

With regard to agriculture and forestry resources, biological resources, and mineral resources, no such resources are located on the Project Site or in the surrounding area. In addition, the Project would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts. Therefore, cumulative impacts to agriculture and forestry resources, biological resources, and mineral resources would be less than significant.

As analyzed above, the Project would not result in significant impacts to geology and soils. Thus, the Project would not contribute to any cumulative impacts associated with geology and soils. In addition, due to their site-specific nature, geology and soils impacts are typically assessed on a project-by-project basis or for a particular localized area. Therefore, as with the Project, related projects would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. While cumulative development would expose a greater number of people to seismic hazards, as with the Project, related projects would be subject to local, state, and federal regulations and standards for seismic safety. Thus, Project impacts related to geology and soils would not be cumulatively considerable and would be less than significant.

Due to their site-specific nature, hazards and hazardous materials impacts are typically assessed on a project-by-project basis. Therefore, as with the Project, related projects would address site-specific hazards through the implementation of site-specific recommendations and/or mitigation measures. In addition, as with the Project, all related development located in the vicinity of the Project Site would be subject to local, regional, State, and federal regulations pertaining to hazards and hazardous materials. Therefore, with adherence to such regulations, the Project and related projects would not result in significant cumulative impacts with regard to hazards and hazardous materials. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

Related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, as with the Project, related projects would be subject to the City's LID requirements and, for applicable projects, NPDES permit requirements, including development of SWPPPs for construction projects greater than one acre, compliance with SUSMP requirements during operation, and compliance with other local requirements pertaining to hydrology and surface water quality. It is anticipated that related projects would also be evaluated on an individual basis by the City Department of Public Works to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to hydrology and water quality. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

In terms of population and housing, the past, present and future projects would not induce substantial population growth since most of the City is already fully developed and occupied by a long-standing residential population. In addition, not all related projects include residential uses. As discussed in the analysis above, the Project does not propose residential uses and thus would not directly contribute to population growth. While the Project would displace five existing housing units, impacts would be less than significant because it is the Applicant's intention that following receipt of all entitlements, then-existing vacancies in existing units will no longer be filled by new tenants. In addition, other projects might also displace existing housing and people residing in them. However, even if construction of replacement housing were required elsewhere, such developments would likely occur on infill sites

within the City and the appropriate level of environmental review would be conducted to analyze the extent to which the related projects could cause significant environmental impacts. Overall, the Project's contribution would not be cumulatively considerable, and cumulative impacts related to population and housing would be less than significant.

The increase in development and residential service populations from the Project and related projects would result in a cumulative increase in the demand for LAFD services and could have a cumulative impact on fire services. However, similar to the Project, the related projects would be reviewed by the LAFD to ensure that sufficient fire safety and hazards measures are implemented pursuant to project specific requirements, and LAMC and State fire code requirements, which include a review by LAFD for compliance with building and site design standards related to fire/life safety, as well as coordinating with LADWP to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved. Moreover, given that the Project Site is located within an urban area, each of the related projects identified in the area would likewise be developed within urbanized locations that fall within an acceptable distance from one or more existing fire stations. The Project would also generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate. LAFD would also continue to monitor population growth and land development in the City and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and allocated according to the priorities at the time. In addition, consistent with *City of Hayward v. Board Trustees of California State* University (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate fire protection and emergency medical services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to fire protection. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to LAPD protection services, the Project would not introduce a new residential population to the Project Site. To help reduce any on-site increase in demand for police services, the Project and related projects would implement comprehensive safety and design features to enhance public safety and reduce the demand for police services. In addition, the Project, as well as the related projects, would generate revenues to the City's Municipal Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new facilities and related staffing, as deemed appropriate. Furthermore, in accordance with the police protection-related goals, objectives, and policies set forth in the City's General Plan Framework Element, the LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated according to the priorities at the time. In addition, consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and the protection of the public safety is the

first responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to police protection. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to public services such as schools, parks/recreational facilities, and libraries, the Project would not generate a residential population that could increase the demand for schools, parks/recreational facilities, and libraries. Therefore, the Project would not contribute to an increased demand for these services. Other related projects could increase the demand for these services and facilities. However, the applicants for those projects would be required to pay mitigation impact fees for identified impacts under applicable regulatory requirements. Specifically, in the case of schools, the applicants for some related projects may be required to pay school impact fees, which would offset any potential impact to schools associated with the related projects. Similarly, in the case of parks and recreational facilities (i.e., existing neighborhood and regional parks), projects would be required by the LAMC to include open space and amenity spaces (e.g. gyms, outdoor decks with pools, etc.) and pay park in-lieu fees (as required), which would help reduce the demand on neighborhood and regional parks, thereby reducing the likelihood that there would be substantial deterioration of parks. Employees generated by the non-residential related projects would be more likely to use parks and library facilities near their homes during non-work hours, as opposed to patronizing local facilities on their way to or from work or during their lunch hours. In addition, each related project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could be applied toward the provision of enhancing park facilities and library services in the City, as deemed appropriate. These revenues to the City's General Fund would help offset the increase in demand for park facilities and library services as a result of the Project and the related projects. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to schools, parks/recreational facilities, and libraries. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

With respect to wastewater, since the HWRP is in compliance with the State's wastewater treatment requirements, and the wastewater generated by the related projects would be typical of urban uses, no industrial discharges into the wastewater system would occur that would exceed the wastewater treatment requirements of the LARWQCB. Additionally, as discussed above, the HWRP currently treats 275 mgd of wastewater and has remaining capacity for 175 mgd. Consequently, there would be no need to construct new or expand wastewater treatment facilities, the construction of which could cause significant environmental effects. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to the wastewater treatment systems. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to stormwater infrastructure, as with the Project, related projects would be required to comply with the requirements of the City's LID Ordinance. In accordance with the City's LID Ordinance, related projects would also implement BMPs to capture a specified amount of runoff within the Project Site and reduce the potential impact of increased runoff to existing drainage systems. Therefore, the Project and related projects would not result in significant cumulative impacts with

respect to stormwater infrastructure. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

Development of the Project and related projects could require new or expanded telecommunications infrastructure. As with the Project, the installation of any required telecommunications infrastructure associated with the related projects would occur during a relatively short duration and would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to telecommunication infrastructure. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

The Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction periods. However, given the 148.4 million tons of capacity at the Class III landfills serving the County and urbanized and built-out nature of most of the City, the related projects would similarly represent a minor percentage of the remaining capacity of the County's Class III landfills serving the County. Additionally, the demand for landfill capacity is continually evaluated by the County through preparation of the CoIWMP annual reports. Each annual CoIWMP report assesses future landfill disposal needs over a 15 year planning horizon. Based on the 2019 CoIWMP Annual Report, the County anticipates that future disposal needs can be adequately met for the next 15 years (i.e., 2034) with implementation of strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail. The preparation of each annual CoIWMP provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Furthermore, in future years, it is anticipated that the rate of declining landfill capacity would slow considering the City's goal to achieve zero waste by 2030. Therefore, cumulative impacts with respect to solid waste would be less than significant.

As discussed above, the Project Site is located in an urbanized area, and there are no wildlands located in the vicinity of the Project Site. Therefore, the Project would not contribute to an increased wildfire risk. Moreover, the Project and related projects would be developed in accordance with LAMC requirements pertaining to fire safety. Specifically, Section 57.106.5.2 of the LAMC provides that the Fire Chief shall have the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; Section 57.118 of the LAMC establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects; and Section 57.507.3.1 establishes fire water flow standards. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to wildfire. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project could result in potentially significant impacts with regard to the following topics: air quality; cultural resources; energy; greenhouse gas emissions; hazards and hazardous materials; land use and planning; noise; transportation; tribal cultural resources; and water supply. As a result, these potential effects will be analyzed further in the EIR.