CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
CITY HALL 200 NORTH SPRING STREET LOS ANGELES CA 90012

INITIAL STUDY

Modera Argyle Project

Case Number: ENV-2016-3743-EIR

Project Addresses: 1546 N. Argyle Avenue and 6224 W. Selma Avenue, Los Angeles, California, 90028

Community Plan Area: Hollywood

Council District: 13—O'Farrell

Project Description: The Project proposes to develop a new mixed-use project on a 1.1-acre site located within the Hollywood community of the City of Los Angeles. The Project includes 276 residential units, 13 (5 percent) of which would be restricted to Very Low Income households, approximately 24,000 square feet of neighborhood-serving commercial retail and restaurant uses, and a minimum of 364 vehicle parking spaces. Alternatively, an approximately 27,000 square-foot grocery store could be constructed in lieu of the proposed retail and restaurant uses, and a minimum of 370 vehicle parking spaces would be provided. The proposed uses would be located within a seven-story building containing a ground-floor level with a mezzanine, six residential levels, and four subterranean parking levels. The proposed building would comprise approximately 261,159 square feet of floor area. To provide for the new uses, the approximately 61,816 square feet of existing commercial uses in six buildings and associated surface parking areas would be demolished.

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

PREPARED BY:
Eyestone Environmental

APPLICANT:
MCRT Investments, LLC

August 2017

INITIAL STUDY

Table of Contents

INITIAL STUDY

List of Figures

INITIAL STUDY

List of Tables

CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY
AND APPENDIX G CHECKLIST

LEAD CITY AGENCY	COUNCIL DISTRICT	DATE
City of Los Angeles Department of City Planning	13—Mitch O'Farrell	August 18, 2017

RESPONSIBLE AGENCIES

Potentially including, but not limited to, the Regional Water Quality Control Board, South Coast Air Quality Management District, Los Angeles Building and Safety, Los Angeles Department of Water and Power, Los Angeles Department of Transportation.

PROJECT TITLE/NO.	CASE NOs.
Modera Argyle	ENV-2016-3743-EIR

PROJECT LOCATION

1546 N. Argyle Avenue and 6224 W. Selma Avenue Los Angeles, CA 90028

APPLICANT NAME AND ADDRESS	PHONE NUMBER
MCRT Investments, LLC 949 South Coast Drive, Suite 400 Costa Mesa, CA 92626	(714) 800-1384

PROJECT DESCRIPTION:

The Project proposes to develop a new mixed-use project on a 1.1-acre site located within the Hollywood community of the City of Los Angeles. The Project includes 276 residential units, 13 (5 percent) of which would be restricted to Very Low Income households, approximately 24,000 square feet of neighborhood-serving commercial retail and restaurant uses, and a minimum of 364 vehicle parking spaces. Alternatively, an approximately 27,000 square-foot grocery store could be constructed in lieu of the proposed retail and restaurant uses, and a minimum of 370 vehicle parking spaces would be provided. The proposed uses would be located within a seven-story building containing a ground-floor level with a mezzanine, six residential levels, and four subterranean parking levels. The proposed building would comprise approximately 261,159 square feet of floor area. To provide for the new uses, approximately 61,816 square feet of existing commercial uses contained in six buildings and associated surface parking areas would be demolished (For additional detail, see Attachment A).

ENVIRONMENTAL SETTING:

The Project Site is located in a highly urbanized area. Surrounding uses in the vicinity of the Project Site include the Hollywood Palladium and the site of the recently approved Palladium Residences project to the south and east, the Columbia Square mixed-use project that is under construction to the north, the Camden Hollywood mixed-use project to the west, and the 1600 Vine and W Hollywood developments, as well as the Hollywood/Vine Metro Red Line Station, to the northwest (For additional detail, see Attachment A).

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

Yes; Letters were sent out June 6, 2017, and consultation was requested by the Gabrieleño Band of Mission Indians—Kizh Nation on June 20, 2017. Consultation began on June 28, 2017.

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

DETERMINATION (To be completed by Lead Agency)

On the basis of this initial evaluation:

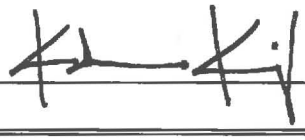
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ 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.

Kathleen King	Planning Associate
PRINTED NAME	**TITLE**
	(213) 978-1195
SIGNATURE	**TELEPHONE NUMBER**

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 Section XVII, "Earlier Analysis," 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.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. 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. Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☐	☒
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒
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. 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?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☒	☐	☐	☐
c. 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☒	☐	☐	☐
d. Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
e. Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐
IV. BIOLOGICAL RESOURCES. 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, or regulations, by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (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?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES: Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☒	☐	☐	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☒	☐	☐	☐
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐
d. Disturb any human remains, including those interred outside of dedicated cemeteries	☒	☐	☐	☐
VI. GEOLOGY AND SOILS. Would the project:				
a. Expose people or structures to 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, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
iv. Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. 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 caused in whole or part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
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	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
water?				
VII. GREENHOUSE GAS EMISSIONS. 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?	☒	☐	☐	☐
VIII. HAZARDS AND HAZARDOUS MATERIALS. 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 caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
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 have the potential to exacerbate current environmental conditions so as to result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project have the potential to result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	☐	☐	☒	☐
e. 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?	☐	☐	☒	☐
f. Otherwise substantially degrade water quality?	☐	☐	☒	☐
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☒	☐
j. Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒
X. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	☐	☐	☒	☐
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES. 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?	☐	☐	☐	☒
XII. NOISE. Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
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 expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
XIII. POPULATION AND HOUSING. Would the project:				
a. Induce substantial 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 housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. 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:				
a. Fire protection?	☒	☐	☐	☐
b. Police protection?	☒	☐	☐	☐
c. Schools?	☒	☐	☐	☐
d. Parks?	☒	☐	☐	☐
e. Other public facilities?	☒	☐	☐	☐
XV. RECREATION.				
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?	☒	☐	☐	☐
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?	☒	☐	☐	☐
XVI. TRANSPORTATION/TRAFFIC. Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☒	☐	☐	☐
b. Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☒	☐	☐	☐
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e. Result in inadequate emergency access?	☐	☐	☒	☐
f. Conflict with adopted policies, plans, or programs	☒	☐	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?				
XVII. TRIBAL CULTURAL RESOURCES. 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.	☒	☐	☐	☐
XVIII. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☒	☐	☐	☐
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☒	☐	☐	☐
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☒	☐	☐	☐
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☒	☐	☐	☐
e. 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?	☒	☐	☐	☐
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g. Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐
XIX. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to 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, 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?	☒	☐	☐	☐
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. Project Description

INITIAL STUDY

Attachment A: Project Description

A. Project Summary

The Project proposes to develop a new mixed-use project on a 1.1-acre site located within the Hollywood community of the City of Los Angeles. The Project includes 276 residential units, 13 (5 percent) of which would be restricted to Very Low Income households, approximately 24,000 square feet of neighborhood-serving commercial retail and restaurant uses, and a minimum of 364 vehicle parking spaces.[1] Alternatively, an approximately 27,000 square-foot grocery store could be constructed in lieu of the proposed retail and restaurant uses.[2] The proposed uses would be located within a seven-story building containing a ground-floor level with a mezzanine, six residential levels, and four subterranean parking levels. The proposed building would comprise approximately 261,159 square feet of floor area. To provide for the new uses, the approximately 61,816 square feet of existing commercial uses in six buildings and associated surface parking areas would be demolished.

B. Project Location and Setting

1. Project Location

As shown in Figure A-1, Project Location Map, on page A-2, the Project Site is located at 1546 N. Argyle Avenue (southeast corner of Argyle Avenue and Selma Avenue) in the Hollywood community of the City of Los Angeles, 6 miles northwest of downtown Los Angeles and approximately 12 miles east of the Pacific Ocean. Primary regional access is provided by the Hollywood Freeway (US-101), which runs north-south approximately 0.5 mile to the east of the Project Site. Major arterials providing regional access to the Project Site include Sunset Boulevard, Hollywood Boulevard, Gower Street, and Vine Street, and the Project Site is approximately 0.2 mile southeast of the Metro Red Line Hollywood/Vine Station. The Project Site is bounded by Selma Avenue to the north, Argyle Avenue to the west, and existing commercial uses to the east and south.

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[1] *Note that this parking number does not reflect potential bicycle parking reductions applied to the Project's commercial component.*

[2] *Under the grocery store option, the Project's ground floor layout would be slightly reconfigured, but the Project's overall footprint, height, massing, and total floor area would not change. This option would also require 6 additional commercial parking spaces, which would increase the minimum number of vehicle parking spaces for the Project to 370 spaces, again without taking potential bicycle parking reductions into account.*

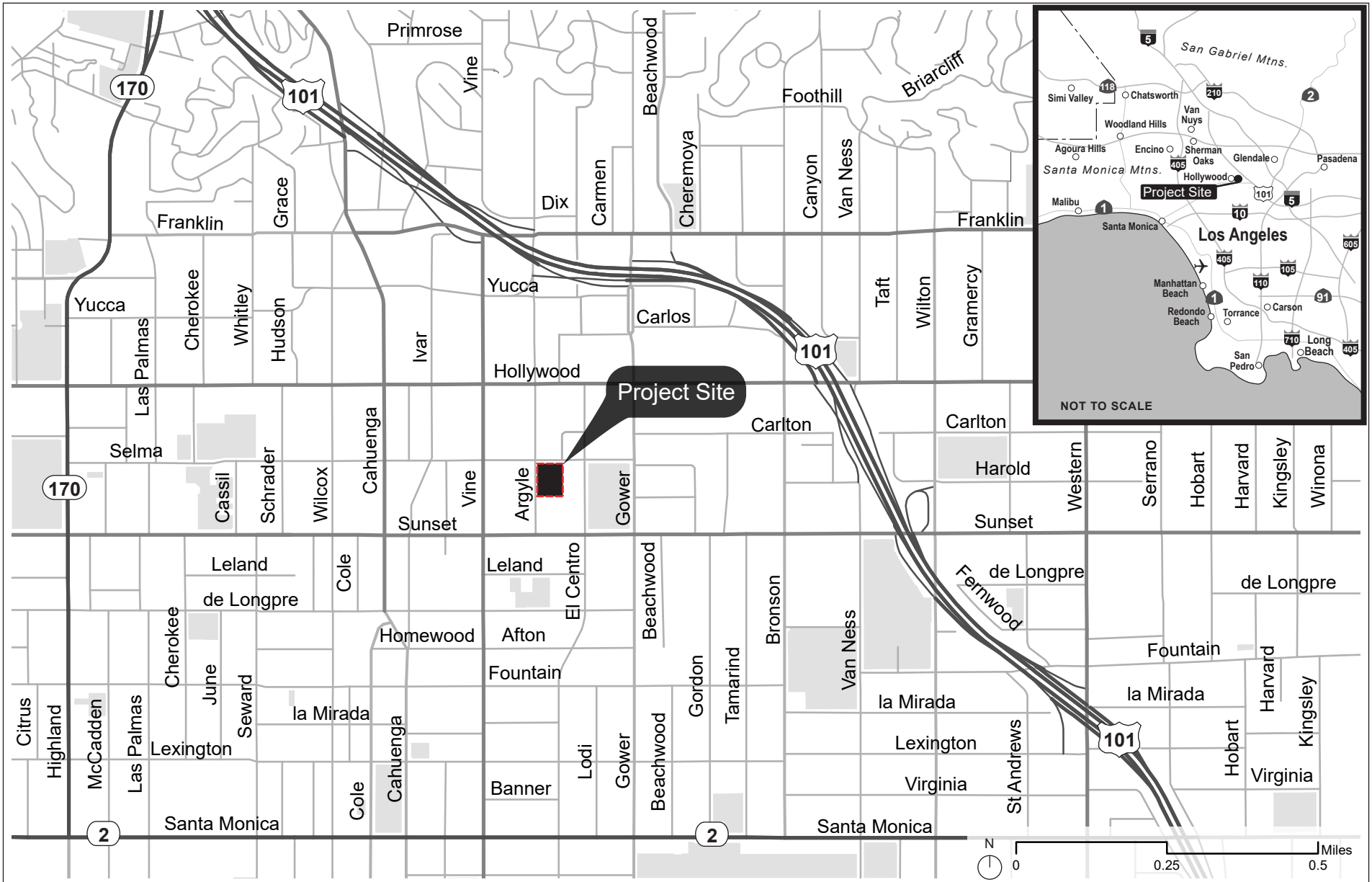

Figure A-1
Project Location Map

Source: Los Angeles County GIS, 2015.

2. Existing Uses

a. Existing Conditions

As shown in Figure A-2, Aerial Photograph of the Project Vicinity, on page A-4, the Project Site is currently developed with six commercial buildings totaling approximately 61,816 square feet of floor area, as well as surface parking, all of which would be demolished to provide for the Project. The buildings are currently occupied by a commercial audio/video equipment rental and sales business, offices, and a commercial printing shop. Table A-1, Summary of Existing Uses, on page A-5 provides the approximate square footage for each type of use. Landscaping within the Project Site is limited, with one lemon gum tree located toward the southwestern portion of the Project Site. In addition, six ficus and evergreen pear street trees are located outside of the property line along Selma and Argyle Avenues. All existing on- and off-site trees would be removed to accommodate the development of the Project.

b. Existing Land Use and Zoning

The Project Site is located within the planning boundary of the Hollywood Community Plan (Community Plan), adopted in December 1988. The City is currently in the process of updating the Community Plan. Under the adopted Community Plan, the Project Site is designated for Commercial Manufacturing land uses. This land use designation is inconsistent with all surrounding properties, which are designated for Regional Center Commercial land uses by the Community Plan. The Community Plan also states that the Commercial Manufacturing land use designation corresponds to the CM (Commercial Manufacturing) and P (Parking) zoning designations, neither of which are consistent with the Project Site's current zoning.

The entire Project Site is zoned by the Los Angeles Municipal Code (LAMC) as [Q]C4-1VL-SN (Commercial with Q Condition, Height District 1-VL, Hollywood Signage Supplemental Use District [HSSUD]). As noted above, the C4 zoning designation is inconsistent with the Community Plan's current Commercial Manufacturing land use designation for the Project Site. The C4 zone permits a wide array of land uses, such as retail stores, offices, hotels, schools, parks, and theaters. The C4 zone also permits any land use permitted in the R4 (Multiple Residential) zone, which includes one-family dwellings, two-family dwellings, apartment houses, multiple dwellings, and home occupations. However, the existing Q condition, imposed by Ordinance 165,662 in 1990, prohibits residential uses at the Site.

The Height District 1-VL designation, in conjunction with the C4 zone, imposes a height limit of 3 stories or 45 feet and a maximum FAR of 1.5:1. The "SN" in the Project Site's zoning prefix indicates that the Project Site is located in the HSSUD, which establishes signage regulations that supersede those of the LAMC. The Project Site is also within the boundaries of the Hollywood Redevelopment Project Area (Redevelopment Plan), a Transit Priority Area pursuant to Senate Bill 743, the former Los Angeles State Enterprise Zone, and the Sunset and Vine Business Improvement District.

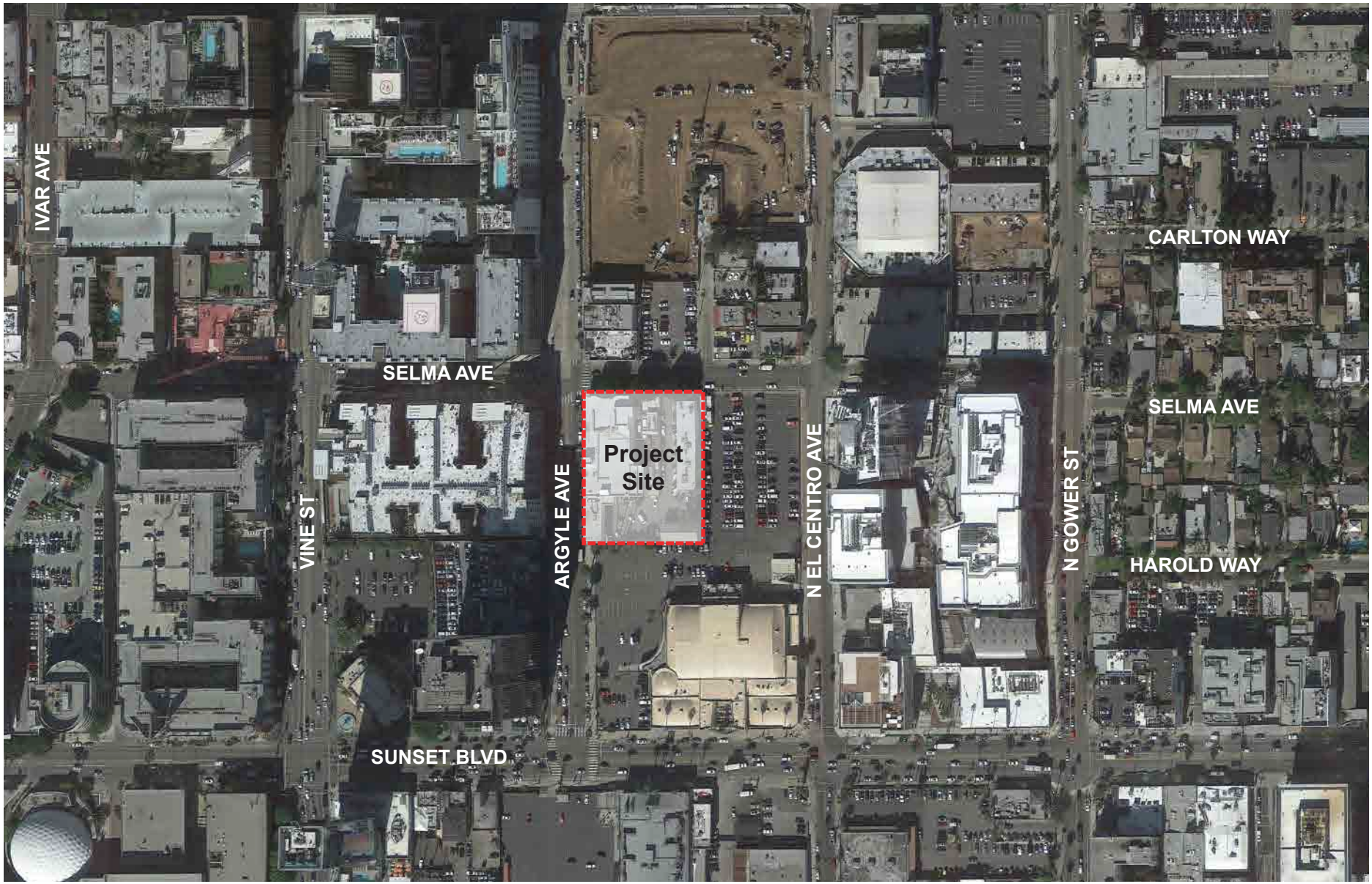

Figure A-2
Aerial Photograph of the Project Vicinity

Source: Google Earth, 2016; Eyestone Environmental, 2016.

Table A-1
Summary of Existing Uses

Land Use	Floor Area (sf)
Warehouse	32,634 sf
Office	15,182 sf
Commercial (retail and print shop uses)	14,000 sf
Total	**61,816 sf**

sf = square feet
Source: MCRT Investments LLC, 2017.

3. Surrounding Uses

The Project Site is located in a highly urbanized area surrounded by existing and planned development. Surrounding uses in the vicinity of the Project Site include the Hollywood Palladium and the site of the recently approved Palladium Residences project to the south and east, the Columbia Square mixed-use project that is under construction one block east, the Camden Hollywood mixed-use project to the west (across Selma Avenue), Phase 2 of Eastown Apartments that is under construction approximately ½-block to the north, and the 1600 Vine and W Hollywood developments, as well as the Metro Red Line Hollywood/Vine Station, to the northwest (across Argyle and Selma Avenues).

B. Description of the Project

1. Project Overview

The Project proposes to develop a mixed-use project on a 1.1-acre site located in Hollywood. As described in more detail below and shown in Table A-2, Summary of Proposed Floor Area, on page A-6, the Project would provide 276 residential units, approximately 24,000 square feet of neighborhood-serving commercial retail and restaurant uses, a minimum of 364 vehicle parking spaces (before any potential bicycle parking reduction), and a minimum of 328 bicycle parking spaces. Alternatively, a 27,000 square foot grocery store could be constructed on the ground floor in lieu of the proposed retail and restaurant uses.[3] To provide for the new uses, approximately 61,816 square feet of existing commercial uses and surface parking would be demolished.

[3] *Under the grocery store option, the Project's ground floor layout would be slightly reconfigured, but the Project's overall footprint, height, massing, and total floor area would not change. This option would also require 6 additional commercial parking spaces, which would increase the minimum number of vehicle parking spaces for the Project to 370 spaces (before any potential bicycle parking reduction), and the minimum number of bicycle parking spaces to 332 spaces.*

Table A-2
Summary of Proposed Floor Area

Land Use	Floor Area[a] (sf)
Project with Retail/Restaurant Option	
Residential	237,159 sf (276 du)
Restaurant	15,000 sf
Retail	9,000 sf
Total	**261,159 sf**
Project with Grocery Store Option	
Residential	234,159 sf (276 du)
Grocery Store	27,000 sf
Total	**261,159 sf**

sf = square feet

du = dwelling unit

[a] *Square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as "[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas."*

Source: Eyestone Environmental, 2017.

The proposed uses would be located within a mid-rise, seven-story building containing a ground floor level with a mezzanine, six residential levels, and four subterranean parking levels. The maximum height of the building would be 85 feet. As shown in Figure A-3, Conceptual Site Plan—Ground Level, on page A-7, the ground floor of the proposed building would include neighborhood-serving commercial uses (either retail and restaurant uses, or a grocery store use) fronting Selma and Argyle Avenues, a residential lobby/lounge accessed from Argyle Avenue, and indoor and outdoor residential open spaces. Fourteen commercial vehicle parking spaces, as well as the Project's short-term bicycle parking spaces, would also be located on the ground level, accessible from Selma Avenue. The ground floor mezzanine level would include additional commercial floor area, as well as additional residential clubhouse open space areas and the Project's long-term bicycle parking spaces. Levels two through seven would include the 276 residential units, with a pool, courtyard, additional clubhouse open space, and landscaped yards provided at the second level. The proposed residential unit mix is anticipated to include 46 studio units, 84 junior one-bedroom units, 106 one-bedroom units, and 40 two-bedroom units of varying sizes and configurations.[4] In addition to the ground level parking, parking would be provided in four subterranean levels. Overall, the proposed building would comprise approximately 261,159 square feet of floor area.

[4] *Junior one-bedroom units are smaller in floor area than the remainder of the Project's one-bedroom units.*

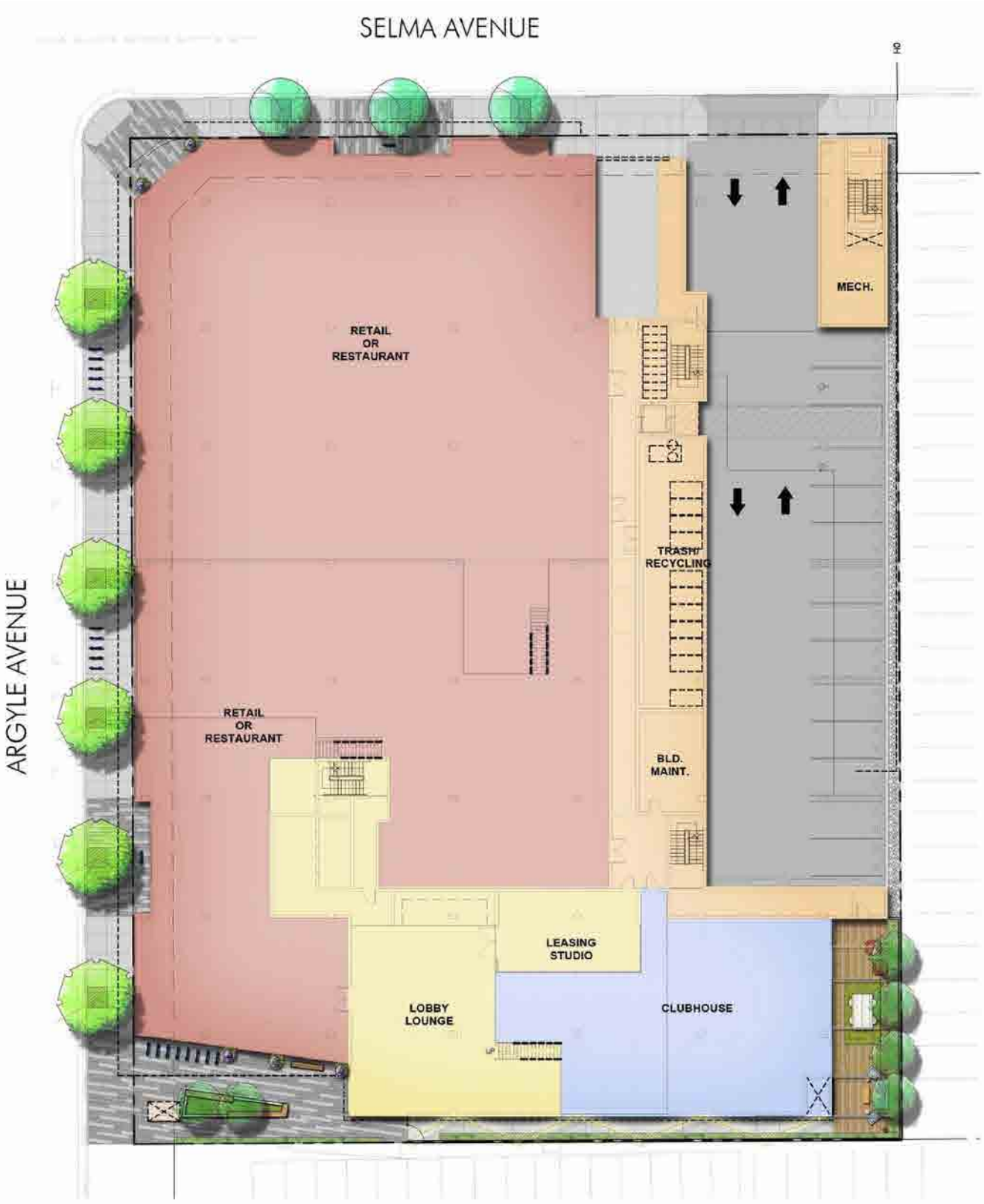

Figure A-3
Conceptual Site Plan – Ground Level

Source: carrierjohnson + culture, 2016.

2. Building Design

As shown in Figure A-4, Conceptual Rendering, on page A-9, the proposed mid-rise building has been designed to be modern in style and to integrate into the Selma Avenue and Argyle Avenue street frontages while promoting a pedestrian environment. Specifically, the façade of the building has been articulated along all street frontages through the use of balconies, recessed windows, and architectural treatments. The building's architectural mass is also broken down by giving priority to building corners and clearly delineating the Project's commercial base from the residential units above. In addition, the proposed neighborhood-serving commercial uses at the ground level are intended to promote pedestrian activity and further activate the streets in the surrounding area. Furthermore, the Project would include the development of wide sidewalks that would be separated from the street with trees, bike parking, and other landscape features. Figure A-5, Conceptual Views—West & North, and Figure A-6, Conceptual Views—East & South, on pages A-10 and A-11 provide conceptual views of the proposed building.

3. Open Space and Recreational Amenities

The Project would include a lobby/lounge, clubhouse, and outdoor patio area located on the ground floor, and additional clubhouse open space area at the mezzanine level. On the second level, a pool and courtyard would be provided, along with a second clubhouse area and landscaped rear and side yard setback areas. Private balconies would be provided for the majority of units in the Project.

The Project would provide a minimum of 30,490 square feet of open space, consisting of over 10,000 square feet of common outdoor open space, over 12,000 square feet of indoor common open space, and over 8,000 square feet of private open space in the form of residential balconies. Pursuant to LAMC Section 12.22-A,25(g)(3), the Applicant is requesting an off-menu incentive to allow up to 46 percent of the Project's required open space to consist of interior common open space, in lieu of the maximum of 25 percent otherwise required by LAMC Section 12.21-G,2(a)(4)(i).

As part of the Project, the six existing ficus and evergreen pear street trees along Selma and Argyle Avenues are expected to be removed, as well as the one lemon gum tree located on the Project Site. In addition, overall, a minimum of 69 new trees would be planted along the parkways and on the Project Site, in accordance with LAMC requirements.

4. Signage and Lighting

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 residential corridors. No off-premises billboard advertising is proposed as part of the Project, and all signage would comply with the requirements of the LAMC and HSSUD.

Figure A-4
Conceptual Rendering

Source: carrier johnson + CULTURE, 2017.

VIEW WEST ALONG EL CENTRO AVE

VIEW NORTH ALONG SUNSET

Figure A-5
Conceptual Views – West & North

Source: carrier johnson + CULTURE, 2017.

VIEW EAST ALONG ARGYLE ST

VIEW SOUTH ALONG SELMA AVE

Figure A-6
Conceptual Views – East & South

Source: carrier johnson + CULTURE, 2017.

Exterior lighting along the public areas would include pedestrian-scale fixtures and elements. Project 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 site. Project lighting is intended to provide for lighting solutions that would 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.

5. Access, Circulation and Public Transportation

Vehicular access for both the commercial and residential components of the Project would be from Selma Avenue via two driveways. One driveway would provide one-way ingress and egress for delivery trucks, while the second driveway would provide two-way ingress and egress for vehicular access to the Project's at-grade and below-grade parking areas. There would be no vehicular access off of Argyle Avenue.

Pedestrian access to the ground-floor neighborhood-serving commercial uses would be from both Argyle and Selma Avenues. Project residents would access the Project Site from a residential lobby located on Argyle Avenue. The residential uses would also be accessed from all levels of the parking garage.

There are multiple public transportation opportunities in the Project Site's immediate area. In particular, the Metro Red Line Hollywood/Vine Station is located 0.2 mile northwest of the Project Site. Additionally, Metro and Los Angeles Department of Transportation (LADOT) operate numerous bus lines with stops located in close proximity to the Project Site.

6. Parking

Parking for the proposed uses would be provided in accordance with the LAMC requirements. Pursuant to LAMC Section 12.22-A,25(d)(1), the Project is required to provide one vehicle parking space for each residential dwelling unit with 0–1 bedroom and two parking spaces for each residential dwelling unit with 2–3 bedrooms. Pursuant to LAMC Section 12.21-A,4(x)(3)(2), the Project is required to provide one vehicle parking space for each 500 square feet of commercial floor area. As shown in Table A-3, Vehicular Parking, on page A-13, a minimum of 364 vehicle parking spaces would be required, without taking potential bicycle parking reductions into account, if the retail and restaurant option is constructed. For the grocery store option, a minimum of 370 vehicle parking spaces would be required, again without taking potential bicycle parking reductions into account.

Pursuant to LAMC Section 12.21-A,16(a), the Project with retail and restaurant commercial uses would also provide a minimum of 328 bicycle parking spaces, which would include 40 short-term spaces and 288 long-term spaces. For the grocery store option, the Project would provide

Table A-3
Vehicular Parking

Use Type	Units/ Square Feet/Rooms	LAMC Requirement	No. of Spaces Required
Commercial			
Retail/Restaurant Option	24,000 sf	1 space/500 sf[a]	48
Grocery Store Option	27,000 sf	1 space/500 sf[a]	54
Residential			
Studio	46 units	1 space/unit[b]	46
Jr. 1 bedroom	84 units	1 space/unit	84
1 bedroom	106 units	1 space/unit	106
2 bedroom	40 units	2 spaces/unit	80
Total Vehicle Parking Required with Retail/Restaurant Option[c]			**364**
Total Vehicle Parking Required with Grocery Store Option[c]			**370**

sf = square feet

[a] *Commercial parking requirement pursuant to the Site's location within the Hollywood Redevelopment Plan area (LAMC Section 12.21-A,4(x)(3)(2)).*

[b] *Density Bonus Parking Option No. 1 (LAMC Section 12.22-A,25(d)(1)).*

[c] *Vehicle parking totals do not reflect potential bicycle parking reductions.*

Source: Eyestone Environmental, 2017.

a minimum of 332 bicycle parking spaces, which would include 42 short-term spaces and 290 long-term spaces.

7. FAR, Density, and Setbacks

As set forth below, the Project is requesting a General Plan Amendment to modify the Project Site's land use designation from Commercial Manufacturing to Regional Center Commercial and a Vesting Zone and Height District Change from [Q]C4-1VL-SN to (T)(Q)C4-2D-SN. Following the approval of these requests, the Project Site's land use designation and zoning would permit density equivalent to the R5 (Multiple Residential) zone, or one dwelling unit per 200 square feet of lot area, pursuant to LAMC Section 12.22-A,18.

Following an anticipated 15-foot radius corner dedication at Selma and Argyle, the Site will include 48,403 square feet of lot area, which permits a maximum base density of 242 dwelling units. Pursuant to State density bonus law and LAMC Section 12.22-A,25, the Project would set aside 5 percent of the base density units (or 13 units) for Very Low Income households. This qualifies the Project for up to a 20 percent density bonus, or a maximum of 291 units. The Project's proposed unit count of 276 units is below this maximum (and equivalent to an approximately 14 percent density bonus).

Following approval of the requested General Plan Amendment and Vesting Zone and Height District Change, the base FAR for the Site would be 4.5:1, consistent with the floor area limits contemplated by both the Community Plan and Redevelopment Plan for properties designated as Regional Center Commercial. Pursuant to State density bonus law and LAMC Section 12.22-A,25(f), the Project's provision of 5 percent Very Low Income units allows the use of one on-menu development incentive, which the Applicant has elected to utilize as a 20-percent increase in floor area. This permits the maximum FAR for the Site to increase from 4.5:1 to 5.4:1, or 261,376 square feet. The Project's proposed floor area of 261,159 square feet is below this maximum amount.

In connection with the Project's requested Vesting Tentative Tract Map, the Applicant is requesting that Argyle Avenue be designated the Site's front yard, to correlate to the orientation of the Project and the proposed location of its primary commercial and residential entrances. In accordance with the LAMC, the Project would be constructed up to the property line along Selma and Argyle Avenues, and would provide a southerly side yard and an easterly rear yard starting at the first level containing residential units. The Applicant is requesting that the Advisory Agency approve an approximately 20-percent reduction in the required rear yard pursuant to LAMC Section 17.03.

8. 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 energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but would not be limited to WaterSense-labeled plumbing fixtures and Energy Star–labeled appliances; reduction of indoor and outdoor water use; weather-based controller and drip irrigation systems; and water-efficient landscape design.

(a) CEQA Guidelines Appendix F

In accordance with CEQA Guidelines Appendix F, the EIR will provide further information as to energy conservation, energy implications, and the energy-consuming equipment and processes that would be used during Project construction and operation. Design features of the Project, energy supplies that would serve the Project, and total estimated daily vehicle trips that would be generated by the Project will also be analyzed. In addition, while development of the Project would not be anticipated to cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F of the CEQA Guidelines, further analysis of the Project's consistency with Appendix F will also be provided in the EIR.

C. Project Construction and Scheduling

Construction of the Project would commence with demolition of the existing structures and surface parking lot, followed by grading and excavation for the subterranean parking garage. Building foundations would then be laid, followed by building construction, paving/concrete

installation, and landscape installation. Project construction is anticipated to occur over a 30 month period and be completed in 2023. The estimated depths of excavation expected for the subterranean parking and building foundations would be up to approximately 50 feet below grade. It is estimated that approximately 89,000 cubic yards of soil export would be hauled from the Project Site during the demolition and excavation phase. As part of the Project, a Construction Traffic Management Plan and Truck Haul Route Program would be implemented during construction to minimize potential conflicts between construction activity and through traffic. The Construction Traffic Management Plan and Truck Haul Route Program would be subject to LADOT review and approval.

D. Necessary Approvals

The City of Los Angeles has the principal responsibility for approving the Project. Approvals required for development of the Project may include, but are not limited to, the following:

- Pursuant to LAMC Section 11.5.6, a General Plan Amendment to the Hollywood Community Plan from Commercial Manufacturing to Regional Center Commercial;

- Pursuant to LAMC Section 12.32-F and Q, a Vesting Zone/Height District Change [Q]C4-1VL-SN to (T)(Q)C4-2D-SN to remove the Project Site's existing Q condition prohibiting residential uses (per Ordinance No. 165,662), and to establish Height District No. 2 with a base FAR of 4.5:1;

- Pursuant to LAMC Section 12.22-A,25, a Density Bonus Compliance Review for a total of 276 residential units (reflecting a 14-percent density bonus) with 5 percent of the Project Site's permitted base density (13 units) set aside as Very Low Income Household Units and utilizing Parking Option No. 1. Pursuant to LAMC Section 12.22-A,25(f)(4)(i), an On-Menu Incentive to permit a 20-percent increase in the allowable FAR (from 4.5:1 to 5.4:1). Pursuant to LAMC Section 12.22-A,25(g)(3), an Off-Menu Incentive to allow up to 46 percent of the Project's required open space to consist of interior common open space, in lieu of a maximum of 25 percent;

- Pursuant to LAMC Section 12.24-W,1, a Master Conditional Use Permit (CUB) for the sales and/or dispensing of alcoholic beverages for three (3) on-site full line permits in connection with the Project's proposed restaurant uses; or one (1) off-site full line permit in connection with the Project's grocery store option;

- Pursuant to LAMC Section 16.05, Site Plan Review;

- Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map to create one ground lot comprising the entire Project Site and multiple above and/or below grade airspace lots, to effectuate a proposed airspace vacation, to designate Argyle Avenue as the Site's front yard, to allow up to a 20-percent reduction in the Project's required rear yard pursuant to LAMC Section 17.03, and to grant approval of a haul route;

- Construction permits, including building, grading, excavation, foundation, and associated permits;

- Other discretionary and ministerial permits and approvals that may be deemed necessary.

B. Explanation of Checklist Determinations

INITIAL STUDY

Attachment B: Explanation of Checklist Determinations

The following discussion provides responses to each of the questions set forth in the City of Los Angeles Initial Study Checklist. The responses below indicate those issues that are expected to be addressed in an environmental impact report (EIR) and demonstrate why other issues would not result in potentially significant environmental impacts and thus do not need to be addressed further in an EIR. The questions with responses that indicate a "Potentially Significant Impact" do not presume that a significant environmental impact would result from the Project. Rather, such responses indicate those issues that will be addressed in an EIR with conclusions of impact reached as part of the analysis within the EIR.

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."[1]

PRC Section 21099 applies to the Project. The Project is a mixed-use residential development that is within 0.5 mile of a major transit stop (i.e., the Metro Red Line Hollywood/Vine Station is approximately 0.2 mile north of the Project Site). Therefore, the Project is exempt from aesthetic impacts. The analysis in this Initial Study is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment. Any aesthetic impact analysis in this Initial Study is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this Initial Study shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

However, visual resources can also include on- and off-site historic resources. In concluding that aesthetic impacts shall not be considered significant effects on the environment, SB 743 does not include impacts on historical or cultural resources (PRC Section 21099(d)(2)(B)). Thus, any aesthetic impacts that could destroy or diminish the significance of historical or cultural resources will be fully analyzed in the EIR.

Would the project:

a. Have a substantial adverse effect on a scenic vista?

No Impact. A scenic vista is a public view of a valued visual resource. Scenic vistas generally include public views that provide visual access to large panoramic views of natural features, unusual terrain, or unique urban or historic features, for which the field of view can be wide and extend into the distance, and focal views that focus on a particular object, scene, or feature of interest.

As described in Attachment A, Project Description, of this Initial Study, the Project Site is currently developed with six commercial buildings totaling approximately 61,816 square feet of floor area, as well as surface parking, all of which would be demolished to provide for the Project. The buildings are currently occupied by a commercial audio/video equipment rental and sales business, offices, and a commercial printing shop. Visual resources that can be seen in combination with the Project Site are primarily limited to those located adjacent to the Project Site due to the densely developed nature of the area. However, intermittent views of the Hollywood Hills are available from adjacent streets including Argyle and Selma Avenues.

The Project would develop a mixed-use building with a maximum height of 85 feet. Public views of the Hollywood Hills would continue to be provided from adjacent streets. However, as noted above, views are limited due to the densely developed nature of the area.

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[1] *City of Los Angeles, Department of City Planning, Zoning Information File No. 2452, http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf, accessed March 24, 2017.*

Panoramic views that include the Project Site are available from a variety of vantage points in the Hollywood Hills to the north. As is the case under existing conditions, future views with implementation of the Project would continue to depict the highly urbanized area stretching from Hollywood to downtown Los Angeles and beyond. Despite the increase in building height and density that would result from the Project, the Project Site would remain difficult to discern within the greater fabric of urban development. In terms of long-range views, the Project would not interfere with current views of the downtown skyline and distant horizon line that are available from public rights-of-way within the Hollywood Hills. Thus, the Project would not have a substantial adverse effect on a scenic vista. Furthermore, pursuant to SB 743 and ZI 2452, the Project would result in no impact to scenic vistas. Therefore, no further evaluation of this topic in an EIR is required.

b. 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 officially eligible state scenic highway is along the Foothill Freeway (I-210), approximately 10.2 miles northeast of the Project Site,[2] and the nearest City-designated scenic parkway is along Mulholland Drive, approximately 1.5 miles northwest of the Project Site.[3] In addition, the Project Site is located more than five miles northeast of a short portion of the Pasadena Freeway (also known as the Arroyo Seco Historic Parkway) that is designated as a Historic Highway by the California Department of Transportation. Views of the Project Site are not available from the I-210, Mulholland Drive, or the Pasadena Freeway. Therefore, the Project would not substantially damage scenic resources, including those located within a state or City-designated scenic highway. As such, the Project would not result in an impact to scenic resources within a scenic highway. Furthermore, pursuant to SB 743 and ZI 2452, the Project would result in no impact to scenic resources. Therefore, no further evaluation of this topic in an EIR is required.

c. Substantially degrade the existing visual character or quality of the site and its surroundings?

No Impact. There is a wide range of aesthetic characteristics and contrasts within the City of Los Angeles due to the intermingled suburban neighborhoods, dense urban areas, hillside residential areas, and accompanying urban fabric and infrastructure. This urban mosaic is also evident in the vicinity of the Project Site. In the surrounding community, the aesthetic environment reflects a multitude of interspersed low-, mid-, and high-rise structures with commercial and residential uses and associated infrastructure. Relative to surrounding development, the aesthetic environment is characterized by buildings that vary in age, architecture, height, massing, and materials. An analysis of the Project's potential changes to the existing visual character of the Project Site and surrounding area is provided below.

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[2] *California Scenic Highway Mapping System, Los Angeles County, www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, accessed October 26 2016.*

[3] *Mobility Plan 2035, Map A4, Citywide General Plan Circulation System—Central, Midcity Subarea.*

Construction

Construction activities generally cause a temporary contrast to, and disruption in, the general order and aesthetic character of an area. Although temporary in nature, construction activities may cause a visually unappealing quality in a community. During construction activities for the Project, the visual appearance of the Project Site would be altered due to the demolition of the existing structures and the presence of construction equipment. Some of the activity would be visible from roadways adjacent to the Project Site, as well as to viewers within nearby buildings. However, temporary construction fencing would be placed along the periphery of the Project Site to screen much of the construction activity from view at the street level, and graffiti would be removed, as needed, from all temporary walkways and construction fencing throughout the Project construction period.

There is one on-site tree located within the Project Site and six street trees located along Selma and Argyle Avenues. None of the trees are of a species that is protected by the Los Angeles Municipal Code (LAMC). All existing on- and off-site trees would be removed to accommodate the development of the Project. The on-site tree would be replaced on a 1:1 basis, while the street trees would be replaced on a minimum 2:1 basis or as determined by the Department of Public Works. Thus, the removal of these trees during construction activities would not substantially alter or degrade the existing visual character of the Project area.

Overall, while affecting the visual character of the Project area on a short-term basis, Project construction activities would not substantially alter or degrade the existing visual character or quality of the Project Site and surrounding area, for the following reasons: (1) views of construction activity would be limited in duration and location; (2) the Project Site appearance would be typical of construction sites in urban areas; (3) construction would occur within an urban setting with a high level of human activity and development; and (4) construction fencing would be placed along the periphery of the Project Site to screen much of the construction activity from view at the street level. Furthermore, pursuant to SB 743 and ZI 2452, the Project would result in no impact to visual character or quality during construction of the Project.

Operation

The Project Site is currently developed with six commercial buildings totaling approximately 61,816 square feet of floor area, as well as surface parking. All of these buildings would be demolished. As shown in the Conceptual Site Plan provided in Figure A-3 of Attachment A, Project Description, the proposed seven-story mid-rise building would occupy the majority of the Project Site. The proposed mid-rise building, shown in Figure A-4, Conceptual Rendering, of Attachment A, Project Description, has been designed to be contemporary in style and to be integrated into the street frontages on Selma and Argyle Avenues while promoting a pedestrian environment. Specifically, the façade of the building has been articulated along all street frontages through the use of balconies, recessed windows, and architectural treatments. The building's architectural mass is also broken up by giving priority to building corners and clearly delineating the Project's commercial base from the residential units above. In addition, the proposed neighborhood-serving commercial uses at the ground and mezzanine levels are intended to promote pedestrian activity and further activate the streets in the surrounding area. The Project would include the development of wide sidewalks that would buffer pedestrians from the street with trees, bike parking, and other

landscape features. Additionally, proposed parking on-site would be designed to maximize efficiency and minimize visual intrusions. The parking to be provided on-site would be located within four subterranean levels and within a portion of the ground level. The four subterranean levels would not be visible from off-site public views along surrounding streets. In addition, the portion of the ground floor level that would be used for parking would be enclosed and oriented to the east with limited frontage on Selma Avenue.

The Project Site contains only minimal landscaping under existing conditions. Landscaping would be enhanced as part of the Project. A minimum of 69 new trees would be planted along the parkways and on the Project Site.

As discussed above, the aesthetic environment of the Project vicinity reflects a multitude of interspersed low-, mid-, and high-rise structures with commercial and residential uses and associated infrastructure. As shown in Figure A-5, Conceptual Views—West & North, and Figure A-6, Conceptual Views—East & South, of Attachment A, Project Description, the Project would become part of this urban fabric and the Project massing, height, and aesthetic character would be consistent with many of the existing and proposed commercial and residential structures in the vicinity of the Project Site. In particular, the proposed maximum building roofline height of 85 feet would be consistent with other building heights in the vicinity. In addition, as discussed above, the Project has been designed to integrate into the street frontages along Selma and Argyle Avenues, while providing for an enhanced pedestrian experience. The Project design would not conflict with the surrounding visual environment in terms of building height, design, massing, and scale.

Project signage would be designed to be aesthetically compatible with the proposed architecture of the Project and other signage in the area. Additionally, the Project is in the Hollywood Signage Supplemental Use District (HSSUD) and would comply with all related requirements under this district. 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 residential corridors. While the Project would change the visual character of the Project Site, the building height, design, massing, and scale would be compatible with the existing urban uses that set the aesthetic character of the vicinity. Based on the analysis above, the Project would not substantially degrade the existing visual character or quality of the Project Site or surrounding vicinity. Furthermore, pursuant to SB 743 and ZI 2452, the Project would result in no impacts to visual character or quality.

Shading

As provided in the L.A. CEQA Thresholds Guide, the visual character or quality of a site and its surroundings can also be affected by shading cast upon adjacent areas by proposed structures. Shadows may provide positive effects, such as cooling effects during warm weather, or negative effects, such as the loss of natural light necessary for solar energy purposes, or the loss of warming influences during cool weather. Shadow effects depend on several factors, including the local topography, height and bulk of a project's structural elements, sensitivity of adjacent land uses, existing conditions on adjacent land uses, season, and duration of shadow projection. According to the L.A. CEQA Thresholds Guide, facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional

land uses (e.g., schools, convalescent homes); commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor dining areas; nurseries; and existing solar collectors. Pursuant to the L.A. CEQA Thresholds Guide, the standard of significance for shading is if shadow sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time (between early November and early March), or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (between early March and early November).

As previously discussed, surrounding uses in the general vicinity of the Project Site include commercial and residential uses. The area to the west of the Project Site across Argyle Avenue contains the Camden Hollywood mixed-use project, which includes routinely useable outdoor spaces, such as outdoor patios. The majority of that property's outdoor amenities are located within the development; however, there are private residential balconies on the eastern elevation facing Argyle Avenue. As shown in the shadow diagrams provided in Appendix IS-1, Project shadows would move steadily from west to north to northeast and would not cast shadows on these residential balconies for three hours or more between the hours of 9:00 A.M. and 3:00 P.M. during the winter or for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. during the remaining seasons. In addition, due to distance and geographic location, no other shadow-sensitive uses in the vicinity have the potential to be shaded for three hours or more by the Project. Based on this, and pursuant to SB 743 and ZI 2452, the Project would result in no impact related to shading.

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

No Impact. The Project Site currently generates moderate levels of artificial light and glare typical of a commercial development. Light sources within the Project Site include low-level security lighting, vehicle headlights, interior lighting emanating from the existing commercial buildings on the Project Site, surface parking lot lighting, and architectural lighting. Glare sources within the Project Site include glass and metal vehicle and building surfaces. The surrounding ambient nighttime lighting environment is typical of a developed, urban environment. The primary nighttime lighting sources in the Project Site vicinity include interior light spillage from buildings, vehicle headlights along roadways and in parking areas, signage, street lamps, and security/ parking lighting.

The Project would introduce new sources of light and glare that are typically associated with residential and commercial uses, including architectural lighting, signage lighting, interior lighting, and security and wayfinding lighting. Surrounding uses with views of the Project Site that are considered sensitive relative to nighttime light include mixed-use buildings to the south, east, and west. In the immediate Project vicinity, the nearest off-site receptors that are considered sensitive relative to daytime glare and have views of the Project Site are motorists along Argyle and Selma Avenues, as well as the mixed-use building to the west.

Construction

In accordance with the provisions of LAMC Section 41.40, construction activities would occur between 7:00 A.M. and 9:00 P.M. on weekdays and between 8:00 A.M. and 6:00 P.M. on

Saturdays and national holidays, with no construction permitted on Sundays. Therefore, construction would occur primarily during daylight hours, and construction lighting would only be used for the duration needed if construction were to occur in the evening hours during the winter season when daylight is no longer sufficient. Furthermore, construction-related illumination would be used for safety and security purposes only, and would be shielded and/or aimed so that no direct beam illumination is provided outside of the Project Site boundary. Construction activities would not result in a new source of substantial light which would adversely affect day or nighttime views in the area. Furthermore, pursuant to SB 743 and ZI 2452, the Project would result in no impact related to lighting during construction of the Project.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight 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. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. As noted above, construction would primarily occur during the daytime hours in accordance with the LAMC. Therefore, there would be a negligible potential for nighttime glare associated with construction activities to occur. Furthermore, pursuant to SB 743 and ZI 2452, the Project would result in no impact related to glare during construction of the Project.

Operation

The Project would replace the existing on-site buildings and parking areas and would increase the number of vehicle trips to and from the Project Site. However, the Project would eliminate sources of glare associated with vehicles parking in the existing surface parking lot. New sources of artificial lighting introduced by the Project would include 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 site. New sources of glare would include building surfaces and Project-related vehicles.

The proposed lighting sources would be similar to other lighting sources in the Project vicinity and would not generate artificial light levels that are out of character with the surrounding area, which is densely developed and characterized by a high degree of human activity during the day and night. All exterior lights, including lights on the terraces and rooftop, would be directed towards the interior of the Project Site to avoid light spillover onto adjacent 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.

As discussed above, Project 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 residential corridors. In general, new signage would be architecturally integrated

into the design of the building and would establish appropriate identification for the commercial and residential uses. No off-site billboard advertising is proposed as part of the Project, and all signage would comply with the requirements of the LAMC and HSSUD.

With regard to glare, the Project would be designed in a contemporary architectural style and would feature various surface materials. Building materials could include concrete, stucco, aluminum, and glass. The Project would use non-reflective glass or glass that has been treated with a non-reflective coating in all exterior windows and building surfaces to reduce potential glare from reflected sunlight. Metal building surfaces would be used as accent materials and would not cover expansive spaces. Therefore, these materials would not have the potential to produce a substantial degree of glare. In addition, the proposed parking areas are either subterranean or located within the interior of the Project at its ground level, which would eliminate the reflection potential from parked vehicles as viewed from surrounding areas and roadways during the day and night, and would substantially reduce lighting levels from vehicle headlights during the night. While headlights from vehicles entering and exiting the Project's driveways would be visible from the residential receptors west of the Project Site during the evening hours, such lighting sources would be typical for the Project area and would not be anticipated to result in a substantial adverse impact.

Based on the above, lighting and glare associated with Project operation would not result in a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Furthermore, pursuant to SB 743 and ZI 2452, the Project would result in no impact related to lighting and glare.

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. 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?

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles. As discussed in Attachment A, Project Description, of this Initial Study, the Project Site is currently developed with six low-rise commercial buildings and associated surface parking. In addition, the uses surrounding the Project Site include commercial and residential uses. 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.[4] 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. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project Site is zoned by the Los Angeles Municipal Code (LAMC) as [Q]C4-1VL-SN (Commercial with Q Condition, Height District 1VL, Hollywood Signage Supplemental Use District). The Project Site is not zoned for agricultural use. Furthermore, none of the surrounding properties are zoned for agricultural use. The Project Site and surrounding area are also not enrolled under a Williamson Act Contract.[5] 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. 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 six low-rise commercial buildings and associated surface parking. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned for commercial uses and is not zoned and/or used as forest land.[6] 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. 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 or timberland. 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.

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?

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[4] *City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, http://zimas.lacity.org/, accessed March 15, 2017.*

[5] *California Department of Conservation, Los Angeles County Williamson Act FY 2015/2016, 2016.*

[6] *City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, http://zimas.lacity.org/, accessed March 15, 2017.*

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles and does not include farmland. The Project Site and surrounding area are not mapped as farmland, are not zoned for farmland or agricultural use, and do not contain any agricultural uses.[7] As such, the Project would not result in the conversion of farmland to non-agricultural 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 applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a. 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 (the 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[8] under federal standards and particulate matter less than 10 microns in size [PM_{10}] under California standards). The SCAQMD's 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of 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.[9] With regard to future growth, SCAG has prepared the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2016–2040 RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area.

Construction and operation of the Project may 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 the SCAQMD's implementation of the AQMP. Therefore, the EIR will provide further analysis of the Project's consistency with the SCAQMD's AQMP.

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[7] *City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, http://zimas.lacity.org/, accessed March 15, 2017.*

[8] *Partial Nonattainment designation for the Los Angeles County portion of the Basin only.*

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

With regard to the Project's consistency with the Congestion Management Program (CMP) administered by the Metropolitan Transportation Authority (Metro), see Response to Checklist Question XVI.b, Transportation/Circulation, below.

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Potentially Significant Impact. The Project would result in increased air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Construction-related pollutants would be associated with sources such as construction worker vehicle trips, the operation of construction equipment, site grading and preparation activities, and the application of architectural coatings. During Project operation, air pollutants would be emitted on a daily basis from motor vehicle travel, natural gas consumption, and other on-site activities. Therefore, the EIR will provide further analysis of the Project's construction and operational air pollutant emissions.

c. 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

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 $PM_{2.5}$. Thus, implementation of the Project could potentially contribute to air quality impacts, which could contribute to cumulative air quality impacts in the Basin. Therefore, the EIR will provide further analysis of cumulative air pollutant emissions associated with the Project.

d. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. As discussed above, the Project would result in increased 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 to the west and northwest of the Project Site. Therefore, the EIR will provide further analysis of the Project's potential to result in substantial adverse impacts to sensitive receptors.

e. Create objectionable odors 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 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 these types of uses. The proposed restaurant uses would comply with SCAQMD Rule 1138 regarding restaurant emissions. In addition, 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.

Construction and operation of the Project would also comply with SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.[10]

Based on the above, the potential odor impact during construction and operation of the Project would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

IV. Biological Resources

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?

Less Than Significant Impact. The Project Site is located in an urbanized area and is currently developed with six low-rise commercial buildings and associated surface parking. Landscaping is limited, with one tree located within the Project Site's surface parking lot, and six ornamental street trees located on the parkway along Selma Avenue and Argyle Avenue. Due to the developed 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 developed settings. 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 California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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[10] *SCAQMD. Rule 402, Nuisance, www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf, accessed March 15, 2017.*

No Impact. The Project Site is located in an urbanized area and is currently developed with six low-rise commercial buildings and associated surface parking. No riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area. 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. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project Site is located in an urbanized area and is currently developed with six low-rise commercial buildings and associated surface parking. No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site or in the immediate vicinity of the Project Site. As such, the Project would not have an adverse effect on federally protected wetlands. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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?

Less Than Significant Impact. As described above, the Project Site is located in an urbanized area and is currently developed with six low-rise commercial buildings and associated surface parking. 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 which provide linkages to natural open space areas and which may serve as wildlife corridors. Accordingly, development of the Project would not interfere substantially with any established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Furthermore, no water bodies that could serve as habitat for fish exist on the Project Site or in the vicinity of the Project Site. Notwithstanding, the existing on- and off-site ornamental trees that would be removed during construction of the Project could potentially provide nesting sites for migratory birds. However, the Project would be required to comply with the Migratory Bird Treaty Act, which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. In accordance with the Migratory Bird Treaty Act, tree removal activities would take place outside of the nesting season (February 15–September 15); however, to the extent that vegetation removal activities must 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 300-foot buffer (500 feet for raptors) would be established until the fledglings have left the nest. With compliance with the Migratory Bird Treaty Act, the impact would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. The City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC) regulates the relocation and/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 of Los Angeles. Trees that have been planted as part of a tree planting program are exempt from this Ordinance and are not considered protected. The 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.

Landscaping within the Project Site is limited, with one lemon gum tree located towards the southwestern portion of the Project Site. In addition, six ficus and evergreen pear street trees are located outside of the property line along Selma and Argyle Avenues. None of these existing trees are protected tree species. All existing on- and off-site trees would be removed to accommodate the development of the Project. Pursuant to the requirements of the City of Los Angeles Urban Forestry Division, the street trees would be replaced on a 2:1 basis. A minimum of 69 trees would be planted as part of the Project. In addition, the new tree species would be drought-tolerant and/or of a climate-adapted nature and would primarily require moist to dry soil conditions. Thus, the planting of new tree species would be selected to enhance the pedestrian environment, convey a distinctive high quality visual streetscape, and complement trees in the surrounding area. 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. 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. The Project Site is located in an urbanized area and is currently developed with six low-rise commercial buildings and associated surface parking. As previously described, landscaping within the Project Site is limited, with a total of seven ornamental trees located along Selma Avenue, Argyle Avenue, and within the surface parking lot. The Project Site does not support any habitat or natural community. Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related 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

Would the project:

a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Potentially Significant Impact. Section 15064.5 of the CEQA Guidelines generally defines a historic 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 Section 5020.1(k) of the Public Resources Code); or (3) identified

as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code). In addition, 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 an 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.

As discussed in Attachment A, Project Description, of this Initial Study, the Project Site is currently developed with six low-rise commercial buildings and associated surface parking. These buildings were constructed between approximately 1923 and 1961 and thus meet the National Register's 50-year threshold for evaluating a potential historic resource.[11] Additionally, known historic resources, including the Hollywood Palladium, are located within the immediate vicinity of the Project Site. Therefore, the EIR will provide further analysis of the Project's potential to result in impacts to historic resources.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Potentially Significant Impact. Section 15064.5(a)(3)(D) of the CEQA Guidelines 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 a highly urbanized area and has been subject to grading and development in the past. Thus, surficial archaeological resources that may have existed at one time have likely been previously disturbed. Nevertheless, it is estimated that approximately 89,000 cubic yards of soil export would be hauled from the Project Site during the demolition and excavation phase. Thus, the Project could have the potential to disturb previously undiscovered archaeological resources. Therefore, the EIR will provide further analysis of the Project's potential impacts to archaeological resources.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially 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 the Precambrian, Paleozoic, and Mesozoic eras are extinct. Although the Project Site has been

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[11] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/, accessed March 15, 2017.*

previously graded and developed, the Project would require grading and excavation to greater depths than those having previously occurred which would have the potential to disturb undiscovered paleontological resources that may exist within the Project Site. Therefore, the EIR will provide further analysis of the Project's potential impacts to paleontological resources.

d. Disturb any human remains, including those interred outside of dedicated cemeteries (see Public Resources Code, Ch. 1.75, §5097.98, and Health and Safety Code §7050.5(b))?

Potentially Significant Impact. As discussed above, the Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. Nevertheless, as the Project would require excavation at depths greater than those having previously occurred on the Project Site, the potential exists for the Project to uncover human remains. Therefore, the EIR will provide further analysis of this topic.

VI. Geology and Soils

The following analysis is based, in part, on the Geotechnical Engineering Investigation (Geotechnical Investigation) prepared for the Project by Geotechnologies, Inc., dated November 10, 2016 and revised June 19, 2017. This report was approved by the Los Angeles Department of Building and Safety, Grading Division, by a letter dated July 26, 2017 (LADBS Approval Letter). The Geotechnical Investigation and the LADBS Approval Letter are included as Appendix IS-2 of this Initial Study.

In 2015, the California Supreme Court in *California Building Industry Assn. v. Bay Area Air Quality Management District* (*CBIA v. BAAQMD*) (2015) 62 Cal.4th 369, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds below are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, in accordance with Appendix G of the State CEQA Guidelines and the *CBIA v. BAAQMD* decision, the Project would have a significant impact related to geology and soils if it would result in any of the following impacts.

Would the project:

a. Expose people or structures to 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, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement younger than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The CGS establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove 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. In addition, the City of Los Angeles designates Preliminary Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

The closest active fault is the Hollywood Fault, which is located approximately 0.3 mile north of the Project Site.[12] The Project Site is not located within the Alquist-Priolo Earthquake Fault Zone for the Hollywood Fault,[13] nor is it located within a City-designated Preliminary Fault Rupture Study Area according to ZIMAS.[14] However, the Project Site is located in a Fault Rupture Study Area as mapped by the General Plan.[15]

Nevertheless, as found by the Geotechnical Investigation, and based upon a review of available literature and site reconnaissance, no known active or potentially active faults underlie the Project Site. Therefore, based on these considerations, the potential for surface rupture beneath the site is considered low. Furthermore, the Project would not exacerbate existing fault rupture conditions. Thus, the Project would not exacerbate existing environmental conditions by bringing people or structures into areas potentially susceptible to substantial adverse effects, including fault rupture. Therefore, impacts associated with surface rupture from a known earthquake fault would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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[12] *State of California, California Geological Survey, Earthquake Zones of Required Investigation Hollywood Quadrangle, updated November 6, 2014.*

[13] *State of California, California Geological Survey, Earthquake Zones of Required Investigation Hollywood Quadrangle, updated November 6, 2014.*

[14] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/, accessed March 15, 2017.*

[15] *City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit A, November 26, 1996, p. 47*

ii. Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. The closest active fault is the Hollywood Fault, which is located approximately 0.3 mile north of the Project Site. The potentially significant impacts related to seismic ground shaking at the Project Site would not be exacerbated by the Project because the Project would not involve mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions that would exacerbate ground shaking. Furthermore, as discussed above, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Therefore, impacts associated with seismic ground shaking would be less than significant, and no mitigation measures are required.

The following discussion about building and seismic codes is provided for informational purposes. Engineering design solutions reduce the substantial risk of exposing people or structures to loss or injury. As discussed in detail below, 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. Development of the Project is feasible on the Project Site with the implementation of the recommendations contained in the Geotechnical Investigation. As with any new development in the State of California, building design and construction for the Project would be required to conform to the current seismic design provisions of the 2016 California Building Code. The 2016 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 provide for the latest in earthquake safety. Additionally, construction of the Project would be required to adhere to the seismic safety requirements contained in the Los Angeles Building Code, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards, including the recommendations in the Geotechnical Investigation and the conditions in the LADBS Approval Letter. In addition, 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 General Plan Safety Element, and the Los Angeles Building Code. Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction of the Project. Based on the above, development of the Project would not exacerbate seismic conditions on the Project Site. Impacts associated with 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, caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact. Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their shear strength due to excess water pressure that builds up during repeated seismic shaking. A shallow groundwater table, the presence of loose to medium dense sand and silty sand, and a long duration and high acceleration of seismic shaking

are factors that contribute to the potential for liquefaction. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials.

Neither the State of California, nor ZIMAS classifies the Project Site as part of a potentially liquefiable area.[16],[17] However, the City's General Plan maps the Project Site as being prone to liquefaction.[18] Therefore, a site-specific liquefaction analysis adhering to CGS procedures was performed. The analysis was based upon the measured groundwater depth of 64 feet below ground surface (bgs) and an assumed 6.6 magnitude earthquake. As discussed in the Geotechnical Investigation, the results of the liquefaction analysis show that the potential for liquefaction at the Project Site is considered to be remote. Therefore, the Project would not expose people or structures to substantial adverse effects associated with liquefaction, and the Project would not exacerbate existing conditions related to liquefaction. Furthermore, as concluded in the Geotechnical Investigation, due to the uniform nature of the underlying geologic materials, excessive differential settlements are not expected to occur on the Project Site. Therefore, based on these considerations, the Project would not exacerbate existing environmental conditions and cause or accelerate geologic hazards related to liquefaction, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. As such, impacts associated with 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, caused in whole or in part by the project's exacerbation of the existing environmental conditions?

No Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and generally characterized by flat topography. In addition, the Project Site is not located in a landslide area as mapped by the State,[19] nor is the Project Site mapped as a landslide area by the City of Los Angeles.[20,21] Therefore, the Project would not exacerbate existing conditions that would result in the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. As such, no impacts associated with landslides would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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[16] *State of California, California Geological Survey, Earthquake Zones of Required Investigation Hollywood Quadrangle, updated November 6, 2014.*

[17] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/, accessed March 15, 2017.*

[18] *City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit B, November 26, 1996, p. 49.*

[19] *State of California, California Geological Survey, Earthquake Zones of Required Investigation Hollywood Quadrangle, updated November 6, 2014.*

[20] *City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit C, November 26, 1996, p. 51.*

[21] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/, accessed March 15, 2017.*

b. Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Development of the Project would require grading and excavation and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. Although Project development has the potential to result in the erosion of soils, this potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities. Specifically, all grading activities would require grading permits from the City's Department of Building and Safety, which would include requirements and standards designed to limit potential impacts 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, excavations, and fills. Furthermore, development of the Project will comply with the recommendations set forth in the Geotechnical Investigation and the conditions of the LADBS Approval Letter. Regarding soil erosion during Project operations, the potential is relatively low since the Project Site would be fully developed and/or landscaped. Therefore, with compliance with applicable regulatory requirements, impacts regarding 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. 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 caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact. The Project Site is not located near slopes or geologic features that would result in on- or off-site landsliding or lateral spreading. As stated in the Geotechnical Investigation, the Project Site is not located within an oil field and no oil wells have been drilled on-site. In addition, based on the depth to groundwater (64 feet), subsidence and collapse are not likely to affect the Project Site. As discussed in greater detail in Response to Checklist Question VI.a.iii above, based on the results of the site-specific liquefaction analysis, liquefaction is also considered unlikely at the Project Site. In addition, as concluded in the Geotechnical Investigation, due to the uniform nature of the underlying geologic materials, excessive differential settlements are not expected to occur on the Project Site. Therefore, the Project would not exacerbate existing conditions with regard to geologic or soil stability. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this issue in the EIR is required.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project's exacerbation of the existing environmental conditions?

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. As determined by the investigation conducted for the Geotechnical Investigation, the Project Site is situated on approximately 3 to 7.5 feet of fill consisting of silty sands and sandy silts with minor clayey silts and silty clays which are dark brown, moist, medium dense, fine grained, and stiff. The native alluvial soils beneath the fill consist of sandy to clayey silts and silty sands grading sandier

with depth. The native soils are dark brown, moist to wet, fine to medium grained, and medium dense to very dense and stiff. These soils are in the very low to moderate expansion range, and reinforcement beyond the minimum required by the Los Angeles Department of Building and Safety is not required. Furthermore, development of the Project will comply with the recommendations set forth in the Geotechnical Investigation and the conditions of the LADBS Approval Letter. Thus, the Project would not exacerbate existing environmental conditions related to expansive soil. Impacts associated with expansive soils would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

In addition, as stated in the Geotechnical Investigation, results of the soil corrosion testing indicated that on-site soils are corrosive to ferrous metals and aggressive to copper. Prior to issuance of grading permits, the City would require the Applicant to submit a design-level geotechnical engineering report to the Los Angeles Department of Building and Safety for review and approval, which would include appropriate corrosion control methods to reduce corrosion. Therefore, the Project would not exacerbate existing environmental conditions related to corrosive soils and impacts would be less than significant. No further evaluation of this topic in an EIR is required.

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?

No Impact. The Project Site is located within a community served by existing sewage infrastructure. The Project's wastewater demand would be accommodated by connections to the existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no 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.

VII. Greenhouse Gas Emissions

Would the project:

a. 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. Activities associated with the Project, including construction and operational activities, would result in greenhouse gas emissions. Therefore, the EIR will provide further analysis of the Project's greenhouse gas emissions.

b. 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 32 [AB 32] and the City of Los Angeles Green Building Code).

VIII. Hazards and Hazardous Materials

The following analysis is based, in part, on the Phase I Environmental Site Assessment (Phase I) dated September 23, 2016, and revised June 16, 2017, and the Limited Phase II Investigation Report (Phase II) dated November 14, 2016, both prepared for the Project by Citadel Environmental Services, Inc. These reports are included as Appendix IS-3 and IS-4, respectively, of this Initial Study.

In 2015, the California Supreme Court in *CBIA v. BAAQMD*, (2015) 62 Cal.4th 369, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds below are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. For example, if construction of the project on a hazardous waste site will cause the potential dispersion of hazardous waste in the environment, the EIR should assess the impacts of that dispersion to the environment, including to the project's residents.

Thus, in accordance with Appendix G of the State CEQA Guidelines and the *CBIA v. BAAQMD* decision, the analysis associated with existing hazardous conditions below focuses on whether the Project would exacerbate these environmental conditions so as to increase the potential to expose people to impacts

Would the project:

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

Less Than Significant Impact. The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of residential and commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed residential and commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. However, all potentially hazardous materials to be used during construction and operation of the Project would be contained, stored, and used in accordance with manufacturers' instructions and

handled in compliance with applicable federal, State, and local regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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?

Less Than Significant Impact. The Phase I included a review of environmental records for the Project Site and a site reconnaissance to identify potential on-site hazards. As discussed therein, the Project Site and adjoining properties to the west and south were occupied by a motion picture company's village, castle, store, and church sets in 1919. At that time, several buildings were depicted in the north portion of the Project Site including a film vault, greenhouse, and office building. The existing on-site buildings were constructed between 1923 and 1961. Today the Project Site consists of a three-story building along the western portion of the Project Site, a two-story commercial building along the eastern boundary of the Project Site, and a one-story warehouse structure in the southeastern corner of the Project Site. In addition, three small vacant structures are located in the center of the Project Site. Historic occupants include a motion picture company and several film laboratories. The existing buildings are occupied by an audio/video retailer/wholesaler with equipment rental and storage facilities, production offices, a commercial print shop, and former film vaults.

With respect to former and current uses, the use of film developing laboratory chemicals between the mid-1920s to the 1980s is considered a recognized environmental condition (REC) for the Project Site. Based on this finding, a Phase II subsurface investigation was conducted. Soil samples tested negative for volatile organic compounds (VOCs) and tetrachloroethylene (PCE). However, PCE was detected in soil vapor samples at a maximum concentration of 850 micrograms per cubic meter ($\mu g/m^3$), which exceeds the environmental screening level (ESL) for residential uses of 240 $\mu g/m^3$. This screening level is based on sampling that occurs directly beneath the concrete slab of residential construction. As discussed in Attachment A, Project Description, of this Initial Study, the residential portion of the Project would be located above ground floor commercial uses, as well as an underground parking garage. The ventilation system within the parking garage and the multiple levels of space between the residential units and any soils that may contain residual PCE in soil vapors would alleviate any potential hazards from these vapors. Additionally, the soil that contains the PCE vapors would be excavated for the construction of the parking garage. Excavation activities would be performed in accordance with a soil management plan (SMP) prepared for the Project. The purpose of the SMP is to describe specific soil-handling controls required for complying with local, state and federal overseeing agencies; prevent unacceptable exposure to contaminated soil; and prevent the improper disposal of contaminated soils. Based on the above, the PCE detected in soil vapor beneath the site would not represent a hazard to the Project Site.

While an asbestos survey was not included in the Phase I, it does note an asbestos survey was completed in 1999. At that time, asbestos was noted to be present in the three primary buildings on-site. As no significant renovations have taken place since that time, it shall be assumed that asbestos-containing materials (ACM) are still present on the Project Site. In accordance with SCAQMD Rule 1403, Asbestos Emissions from Demolition/Renovation Activities,

prior to demolition activities associated with the Project, surveys of all buildings would be required to verify the presence or absence of any ACMs and conduct remediation or abatement before any disturbance occurs. Any ACMs would be removed by a licensed abatement contractor in accordance with all federal, State and local regulations prior to renovation or demolition. Mandatory compliance with applicable federal and state standards and procedures would reduce risks associated with ACM to less than significant levels.

With regard to lead based paint (LBP), given the age of the buildings to be removed, there is the potential for LBP to be present within the structures and large areas of flaking paint were identified in the Phase I ESA. Prior to demolition activities associated with the Project, the Applicant would conduct surveys of all buildings to verify the presence or absence of any LBPs and conduct remediation or abatement before any disturbance occurs. Any LBPs would be removed by a licensed abatement contractor in accordance with all federal, state and local regulations prior to renovation or demolition. Mandatory compliance with applicable federal and State standards and procedures would reduce risks associated with LBP to acceptable levels.

Three pad-mounted Los Angeles Department of Water and Power (LADWP) transformers are located on-site. Until being banned by the U.S. EPA in 1976, transformers were frequently filled with cooling oil containing polychlorinated biphenyls (PCBs). At the time the site reconnaissance was conducted for the Phase I, the gated area containing the transformers was locked and inaccessible for inspection. While the transformers are not anticipated to represent an environmental concern, in the event that PCBs are found, suspect materials would be removed in accordance with all applicable local, state and federal regulations prior to demolition activities. Specifically, the disposal of PCB wastes is regulated by 40 CFR 761 to ensure the safe handling of these materials. With compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of PCBs in the environment. Therefore, impacts related to PCBs would be less than significant, and no mitigation measures are required.

As described in the Phase I ESA, no evidence or records of underground storage tanks or aboveground storage tanks were found.

As confirmed by the Geotechnical Investigation, the Project Site is not within an active or inactive oil field and is not within a Methane Zone or Methane Buffer Zone identified by the City. Therefore, there is a negligible risk of subsurface methane release.

With the exception of the REC due to film developing chemicals, the Phase I did not identify any areas of environmental concern with respect to the Project Site and recommended no further actions or investigations other than those discussed above with respect to PCBs, ACM, and LBP. The Phase II did not recommend any further action than that discussed above with respect to PCE in soil vapor.

Based on the above, with compliance with regulatory requirements, the Project would not result in a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Montessori Shir-Hashirim preschool is located approximately 0.2 mile northeast of the Project Site at 6047 Carlton Way. As discussed above, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of residential and commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed residential and commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used in the vicinity of the Project Site. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Furthermore, all materials during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable federal, state, and local regulations. Additionally, truck haul routes during construction of the Project would likely be along Sunset Boulevard or Hollywood Boulevard to and from the Hollywood Freeway and trucks would not travel adjacent to the school. As such, the use of such materials would not create a significant hazard to nearby schools. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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 cause in whole or in part from the project's exacerbation of existing environmental conditions?

Less Than Significant Impact. Section 65962.5 of the California Government Code requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While Section 65962.5 makes reference to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions or extensive investigations are planned or have occurred. The database provides a listing of federal Superfund sites, State response sites, voluntary cleanup sites, and school cleanup sites.

The Phase I included the results of consultation with local agency representatives and a review of available federal, state, and local databases including, but not limited to, Envirostor, Geotracker, ZIMAS, and the Division of Oil, Gas, and Geothermal Resources (DOGGR). The Project Site is listed in the HAZNET database for generating 0.25 tons of ACM waste in 1994. Based on a lack of reported violations, this is not considered to represent a hazard to the Project Site. Various sites in the vicinity of the Project Site are listed in the databases as leaking underground storage tank (LUST) sites, Resource Conservation and Recovery Act (RCRA) enforcement actions and listed hazardous waste generators, and spill reports. However, the majority of these cases are in remediation or have been closed and none of them are considered to

be an issue for the Project Site. Therefore, the Project would not create a significant hazard to the public or the environment associated with identification of the Project Site on a hazardous materials list.

Additionally, as discussed above, the types and amounts of hazardous materials used during operation of the proposed residential and commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. All potentially hazardous materials to be used during construction and operation of the Project would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, state, and local regulations. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. Therefore, the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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 for people residing or working in the project area?

No Impact. The Project Site is not located within an area subject to an airport land use plan or within 2 miles of an airport. The closest airport is Burbank Bob Hope Airport, located approximately 7.2 miles from the Project Site. Given the distance between the Project Site and Burbank Bob Hope Airport and the Project height, the Project would not have the potential to exacerbate current environmental conditions that would result in a safety hazard. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The Project Site is not located within the vicinity of a private airstrip. No impact would occur, and no mitigation measures are required. Given the Project height and the fact that there are no private airstrips in the immediate vicinity, the Project would not have the potential to exacerbate current environmental conditions that would result in a safety hazard. No further evaluation of this topic in an EIR is required.

g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The City of Los Angeles' 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, along with the location of selected emergency facilities. According to the Safety

Element of the City of Los Angeles General Plan, the Project Site is not located along a designated disaster route.[22] The closest disaster routes include the Hollywood Freeway, located approximately 0.5 mile east of the Project Site, and Santa Monica Boulevard, located approximately 1.1 miles south of the Project Site.

While it is expected that the majority of construction activities for the Project would be confined to the Project Site, temporary and limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially affect emergency access adjacent to the Project Site. However, access to the Project Site and surrounding area during construction of the Project would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Therefore, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan, and impacts during construction would be less than significant level.

With regard to operation, the Project does not propose the permanent closure of any local public streets and access to the Project Site would continue to be provided from Selma Avenue and Argyle Avenue. In addition, the Project would not install barriers that would impede emergency response within and in the vicinity of the Project Site. The Project would also be expected to provide adequate emergency access and comply with Los Angeles Fire Department (LAFD) access requirements during operation. Therefore, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan during operation of the Project. Impacts during operation would be less than significant, and no mitigation measures are required.

Based on the above, no further analysis of this topic in an EIR is required.

h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands caused in whole or in part from the project's exacerbation of existing environmental conditions?

Less Than Significant Impact. 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.[23] The Project Site is, however, located near a City-designated Fire Buffer Zone.[24] The Project would be developed in accordance with LAMC requirements pertaining to fire safety. Additionally, the proposed residential and commercial uses would not create a fire hazard that has

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[22] *City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit H, November 26, 1996, p. 61.*

[23] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/, accessed October 26, 2016. 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.*

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

the potential to exacerbate the current environmental condition relative to wildfires. Therefore, the Project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

IX. Hydrology and Water Quality

The following analysis is based, in part, on the Water Resources Technical Report (Water Resources Report) prepared for the Project by Kimley Horn, dated June 15, 2017. This report is included as Appendix IS-5 of this Initial Study.

Would the project:

a. Violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. Construction activities such as earth moving, maintenance/ operation of construction equipment, and handling/storage/disposal of materials could contribute to pollutant loading in stormwater runoff. Therefore, Project-related construction activities could potentially result in adverse effects on water quality. However, as Project construction would disturb more than one acre of soil, the Project would 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. In accordance with the requirements of the permit, a Stormwater Pollution Prevention Plan (SWPPP) would be developed and implemented during construction of the Project. The SWPPP would set forth Best Management Practices (BMPs), including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff. The SWPPP would be carried out in compliance with State Water Resources Control Board requirements and would also be subject to review by the City for compliance with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities.

Based on the depth to groundwater identified by the Geotechnical Investigation (64 feet below ground surface [bgs]), the Project's maximum proposed excavation of up to 50 feet bgs is not anticipated to disturb the groundwater table during construction or operation. If seasonal or perched groundwater is encountered during excavation, a temporary dewatering system, such as pumping or wellpoints, would be implemented in accordance with NPDES permit requirements.

In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC) to reduce the effects of sedimentation and erosion. Prior to the issuance of a grading permit, the Applicant would be required to provide the City with evidence that a Notice of Intent has been filed with the State Water Resources Control Board to comply with the Construction General Permit. Through compliance with NPDES requirements and City grading regulations, including the implementation of BMPs, construction of the Project would not result in discharge that would cause: (1) pollution which would alter the quality of the waters of the State (i.e., Santa Monica Bay) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the waters of the State by waste to

a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes. Furthermore, construction of the Project would not result in discharges that would cause regulatory standards to be violated in Santa Monica Bay. As such, construction-related impacts to surface water quality would be less than significant. No further evaluation of this topic in an EIR is required.

Operation of the Project would introduce sources of potential stormwater pollution that are typical of residential, community, office, and retail uses (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with circulation areas). Stormwater runoff from precipitation events could potentially carry urban pollutants into municipal storm drains. However, the Project would implement BMPs for managing stormwater runoff in accordance with the current City of Los Angeles Low Impact Development (LID) Ordinance requirements. The City's LID Ordinance sets the order of priority for selected BMPs. This order of priority is infiltration systems, stormwater capture and use, high efficiency biofiltration/bioretention systems, and any combination of any of these measures. Based on subsurface conditions, on-site infiltration may be feasible. However, a percolation test would be performed as part of the Project's required design-level geotechnical investigation to confirm feasibility. If infiltration is determined to be infeasible, the next stormwater mitigation method considered would be capture and use. However, as proposed, the mitigation volume required (i.e., 3,373 cubic feet [cf]), would exceed the estimated total water use from April 1 through October 31 (i.e., 2,435 cf), which is the standard per the LID Handbook. Therefore, capture and use would not be feasible as the Project is currently designed. If both infiltration and capture and use are determined to be infeasible, the final stormwater mitigation method considered would be biofiltration/bioretention. In this case the Project would propose the use of planter boxes to meet City LID requirements.

Based on the above, operation of the Project would not result in discharges that would cause: (1) pollution which would alter the quality of the waters of the State (i.e., Santa Monica Bay) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the waters of the State by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes. Furthermore, operation of the Project would not result in discharges that would cause regulatory standards to be violated. Therefore, impacts to surface water quality would be less than significant and beneficial in comparison to existing conditions. No mitigation measures would be necessary and no further evaluation of this topic in the EIR is required.

b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Less Than Significant Impact. As discussed above, groundwater was identified at 64 feet bgs by the Geotechnical Investigation. The Project requires excavation to maximum depths of 50 feet for construction of the subterranean parking levels. Therefore, the need for dewatering during

construction or operation is not anticipated. Furthermore, since there is greater than 10 feet of depth between the bottom of the subterranean structure and the top of the groundwater table, groundwater hydrology on-site would be minimally affected by the Project.

With regard to groundwater recharge, the percolation of precipitation that falls on pervious surfaces is variable, depending on the soil type, condition of the soil, vegetative cover, and other factors. As discussed in the Water Resources Report, the Project Site is entirely impervious under existing conditions. Therefore, the degree to which surface water infiltration and groundwater recharge occurs on-site is negligible. With implementation of the Project, impervious surfaces would comprise approximately 93 of the Project Site, a decrease compared to existing conditions. However, soils on the Project Site have a limited capacity to absorb stormwater during an intense rain event and are anticipated to runoff in a similar manner as impervious surfaces. As such, operation of the Project would not alter the existing limited groundwater recharge that occurs within the Project Site. Furthermore, as discussed above in Response to Checklist Question IX.a, in accordance with the City's LID Ordinance, the Project would include BMPs to treat stormwater. Therefore, the Project would not substantially interfere with groundwater recharge.

Based on the above, the Project would not substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in the aquifer volume or lowering of the local groundwater table. Therefore, impacts on groundwater would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. As discussed in the Water Resources Report, the Project Site is entirely impervious under existing conditions. The Project Site is not crossed by any water courses or rivers. The existing Project Site is assumed to be one drainage area. The drainage area was determined by the drainage patterns and flow paths of stormwater flows that are tributary to a common point or area. Existing roof drainage patterns were assumed based on adjacent surface drainage patterns. The Project Site's overall topography slopes southwesterly with a decrease in grade of approximately six feet from the northeast corner of the site at Selma Avenue to the southwest corner of the site at Argyle Avenue. The existing drainage pattern for the site follows the topography. Stormwater runoff is intercepted by a valley gutter and/or diverted southerly to three on-site drainage inlets. Existing runoff flows during a 50-year storm event are 3.55 cubic feet per second (cfs).

Construction activities associated with the Project, which would involve removal of the existing structures and grading, have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow discussed above in Response to Checklist Question IX.a, in accordance with NPDES requirements the Project would implement a SWPPP that would specify BMPs and erosion control measures to be used during construction to manage runoff flows so that runoff would not impact off-site drainage facilities and receiving waters. In addition, the Project would be required to comply with all applicable City

grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion.

As discussed in the Water Resources Report, under existing conditions, stormwater discharges from the Project Site without filtration. At buildout of the Project, the Project Site would be comprised of approximately 93 percent impervious areas. Accordingly, there is no incremental increase in the imperviousness of the Project Site that would substantially increase runoff volumes into the existing storm drain system. The amount of impervious surface area would, in fact, be reduced. However, as noted above, runoff from the on-site soils are anticipated to behave in a similar manner as runoff from impervious surfaces. As such, post-development runoff flows decrease only slightly to 3.54 cfs during a 50-year storm event. Therefore, stormwater flows from the Project Site would not increase with implementation of the Project and, as such, the Project would not affect the capacity of the existing stormwater infrastructure during a 50-year storm event, as required by the City.[25]

Based on the above, through compliance with all applicable NPDES requirements, including preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading regulations, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion, siltation, or on-site or off-site flooding would occur. Therefore, impacts would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or 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. See Response to Checklist Question IX.c, above.

e. 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?

Less Than Significant Impact. See Response to Checklist Questions IX.a and IX.c, above.

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[25] *Per the City's Special Order No. 007-1299, the City has adopted the Los Angeles County Department of Public Works (LACDPW) Hydrology Manual as its basis of design for storm drainage facilities. The Hydrology Manual requires projects to have drainage facilities to meet the Urban Flood level of protection, which is defined as runoff from a 25-year frequency storm falling on a saturated watershed. The L.A. CEQA Thresholds Guide, however, establishes the 50-year frequency design storm event as the threshold to evaluate potential impacts on surface water hydrology. Therefore, to provide a more conservative analysis of the ability of storm drain infrastructure to accommodate the demand generated by the Project, the higher 50-year storm event threshold was used.*

f. Otherwise substantially degrade water quality?

Less Than Significant Impact. See Response to Checklist Question IX.a, above.

g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

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 of Los Angeles.[26,27] The Project Site is located in Zone X (Other Flood Areas), which are areas of 0.2 percent chance flood; areas of 1 percent annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1 percent annual chance flood. Thus, the Project would not place housing within a 100-year flood hazard area. No impacts would occur, and no mitigation would be required. No further analysis of this topic in an EIR is required.

h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. As discussed above, the Project Site is not located within a designated 100-year flood plain area. Therefore, the Project would not place structures that would impede or redirect flood flows within a 100-year flood plain. No impacts would occur, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Less Than Significant Impact. As discussed above, the Project Site is not located within a designated 100-year flood plain. In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a flood control basin.[28] However, the Project Site is located within the potential inundation area for the Hollywood Reservoir, which is held by the Mulholland Dam.[29] The Mulholland Dam is a Los Angeles Department of Water and Power (LADWP) dam located in the Hollywood Hills approximately 1.3 miles north of the Project Site. The Mulholland Dam was built in 1924 and designed to hold 2.5 billion gallons of water. This dam, as well as others in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design and construction practices and ongoing

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[26] *Federal Emergency Management Agency, Flood Insurance Rate Map, Panel Number 06037C1605F, effective September 26, 2008.*

[27] *City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit F, November 26, 1996, p. 57.*

[28] *City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit G, November 26, 1996, p. 59.*

[29] *City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit G, November 26, 1996, p. 59.*

programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum considered earthquake for the site. Pursuant to these regulations, the Mulholland Dam is regularly inspected and meets current safety regulations. In addition, the LADWP has emergency response plans to address any potential impacts to its dams. Given the oversight by the Division of Safety of Dams, including regular inspections, and the LADWP's emergency response program, the potential for substantial adverse impacts related to inundation at the Project Site as a result of dam failure would be less than significant. No further evaluation of this topic in the EIR is required.

j. Inundation by seiche, tsunami, or mudflow?

No Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement associated with large, shallow earthquakes. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity.

The Project Site is located approximately 11.8 miles northeast of the Pacific Ocean. In addition, the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami.[30] Given the Project Site's location approximately 1.3 miles south of the Hollywood Reservoir, impacts from mudflow or a seiche occurring within the reservoir are unlikely. Moreover, as discussed above in Response to Checklist Question IX.i, given the oversight of the Hollywood Reservoir's Mulholland Dam by the Division of Safety of Dams, including regular inspections, as well as the LADWP's emergency response program, the potential for substantial adverse impacts at the Project Site relating to seiche or mudflow as a result of dam failure would be less than significant. Therefore, no seiche, tsunami, or mudflow events would be expected to impact the Project Site. No impacts would occur, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

X. Land Use and Planning

Would the project:

a. Physically divide an established community?

Less Than Significant Impact. As shown in the aerial photograph provided in Figure A-2 of Attachment A, Project Description, of this Initial Study, the Project Site is located in a highly urbanized area with low- to mid-rise buildings that are occupied primarily by commercial and residential uses. Surrounding uses include the Hollywood Palladium and the site of the recently approved Palladium Residences project to the south and east, the Columbia Square mixed-use project that is under construction to the east, the Camden Hollywood mixed-use project to the west, and the 1600 Vine and W Hollywood developments, as well as the Metro Red Line Hollywood/Vine Station, to the northwest.

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[30] *City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit G, November 26, 1996, p. 59.*

Against this background, the Project would not divide an established community. Specifically, there is no existing residential use on the Project Site or a residential area that would be physically separated or otherwise disrupted by the Project as development of the Project would occur within the boundaries of the existing Project Site. Moreover, the proposed uses would be compatible with the variety of existing land uses and building types in the surrounding area. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. As discussed in Attachment A, Project Description, of this Initial Study, the Project requires discretionary approvals, including, but not limited to, a General Plan Amendment, a Vesting Zone/Height District Change, and a Master Conditional Use Permit. Therefore, the EIR will provide further analysis of the Project's consistency with the General Plan, the LAMC, the Community Plan, and other applicable land use plans, policies, and regulations.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. As discussed above, in Response to Checklist Question IV.f, the Project Site is located in an urbanized area and is currently developed with six low-rise commercial buildings and associated surface parking. Landscaping is limited, with ornamental street trees located outside the Project Site along Selma Avenue and Argyle Avenue, and one on-site tree located within the surface parking lot. The Project Site does not support any habitat or natural community. Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XI. Mineral Resources

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?

No Impact. No mineral extraction operations currently occur on the Project Site. In addition, 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. 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 Geologic Survey.[31,32] The Project Site is also not located within a City-designated oil field or oil drilling area.[33] 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.

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?

No Impact. See Response to Checklist Question XI.a, above.

XII. Noise

Would the project result in:

a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact. The Project Site is located within an urbanized area that contains various sources of noise. The most predominate source of noise in the vicinity of the Project Site is associated with traffic from roadways. Existing on-site noise sources primarily include vehicle noises associated with on-site circulation and parking areas, stationary mechanical equipment, and human activity on the Project Site. 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, because the Project would introduce new permanent residential and commercial uses to the Project Site, noise levels from on-site sources may also 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. Exposure of persons to or 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, other clearing activities, the installation of building footings, and construction truck travel. As such, the Project would have the potential to generate and expose people to excessive groundborne vibration and noise levels during short-term construction activities. Therefore, further evaluation of this topic will be provided in the EIR.

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[31] *City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.*

[32] *State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.*

[33] *City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit E, November 26, 1996, p. 55.*

c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Impact. Traffic and human activity associated with the Project, as described above, have the potential to increase ambient noise levels above existing levels. Therefore, further evaluation of this topic will be provided in the EIR.

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Impact. As discussed above in Response to Checklist Questions XII.a and XII.b, construction activities associated with the Project would have the potential to temporarily or periodically increase ambient noise levels above existing levels. Therefore, further evaluation of this topic will be provided 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 expose people residing or working in the project area to excessive noise levels?

No Impact. The Project Site is not located within an airport land use plan or within 2 miles of an airport. The closest airport to the Project Site, Burbank Bob Hope Airport, is located approximately 7.2 miles from the Project Site. Given the distance between the Project Site and Burbank Bob Hope Airport, the Project would not have the potential to expose people working or residing in the Project area to excessive noise levels. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The Project Site is not located within the vicinity of a private airstrip. Given the Project height and the fact that there are no private airstrips in the immediate vicinity, the Project would not expose people working or residing in the Project area to excessive noise levels. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XIII. Population and Housing

Would the project:

a. Induce substantial 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 result in the construction of 276 new residential multi-family dwelling units. As such, the Project would increase the residential population within the Project vicinity. As discussed above in Checklist Question III(a), Air Quality, 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. With regard to future growth, SCAG has prepared the 2016–2040 RTP/SCS, which provides population, housing, and employment projections for cities under its jurisdiction through 2040. The growth projections in the 2016–2040 RTP/SCS reflect the 2010 Census, employment data from the California Employment Development Department (EDD), population and household data from the California Department of Finance (DOF), and extensive input from local jurisdictions in SCAG's planning area. The Project Site is located in SCAG's City of Los Angeles Subregion. According to SCAG's 2016–2040 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2016 is approximately 3,954,629 persons.[34] In 2023, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,145,604 persons.[35] According to the Census Bureau's 2015 American Community Survey, the estimated household size in the City of Los Angeles is 2.44 persons per unit.[36] Applying this factor, development of 276 units would result in a net increase of approximately 673 residents. The estimated 673 net new residents generated by the Project would represent approximately 0.35 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2016 and 2023. Therefore, the Project's residents would be well within SCAG's population projection for the City of Los Angeles Subregion.

According to the 2016–2040 RTP/SCS, the forecasted number of households for the City of Los Angeles Subregion in 2016 is approximately 1,377,614 households.[37] In 2023, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,468,814 households.[38] Thus, the Project's 276 new residential units would constitute up to approximately 0.30 percent of the housing growth forecasted between 2016 and 2023. Therefore, the Project's housing units would be well within SCAG's housing projection for the Subregion. As emphasized in many regional and local planning documents, including the City of Los Angeles General Plan Housing Element, the City is in need of new dwelling units to serve both the current population and the projected population. By developing 276 new residential dwelling units, which would include 13 Very Low Income units, the Project would help to fulfill this demand.

With regard to employment, the Project's 24,000 square feet of commercial uses would generate approximately 65 employees based on employee generation rates developed by the Los Angeles Unified School District (LAUSD).[39] According to the 2016–2040 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2016 is approximately

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[34] *Based on a linear interpolation of 2012–2040 data.*

[35] *Based on a linear interpolation of 2012–2040 data.*

[36] *United States Census Bureau, 2015 American Community Survey, 2015 Average Household Size of Occupied Housing Units by Tenure, https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_15_1YR_B25010&prodType=table, accessed November 17, 2016.*

[37] *Based on a linear interpolation of 2012–2040 data. SCAG forecasts "households," not housing units. As defined by the U. S. Census Bureau, "households" are equivalent to occupied housing units.*

[38] *Based on a linear interpolation of 2012–2040 data.*

[39] *Los Angeles Unified School District, 2012 Developer Fee Justification Study, February 9, 2012, Table 11. Based on the employee generation rate for "Neighborhood Shopping Center" land uses, which is 0.00271 employee per average square foot.*

1,763,929 employees.[40] In 2023, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,882,104 employees.[41] Thus, the Project's estimated 65 employees would constitute approximately 0.06 percent of the employment growth forecasted between 2016 and 2023. In the event that the grocery store option is constructed, the estimated number of employees generated by the Project would increase to 73 employees, which would also constitute approximately 0.06 percent of the employment growth forecasted between 2016 and 2023. Therefore, the Project would not cause an exceedance of SCAG's employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities.

As analyzed above, the net new population and housing that would be generated by the Project would be within SCAG's population and housing projections for the City of Los Angeles Subregion. Therefore, the Project would not induce substantial population or housing growth. Impacts related to population and housing would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required. With regard to cumulative population and housing impacts, please see Checklist Question XIX.b, below.

b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. As no housing currently exists on the Project Site, the Project would not displace any existing housing. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. As no housing currently exists on the Project Site, the development of the Project would not cause the displacement of any persons or require the construction of housing elsewhere. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XIV. 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:

a. Fire protection?

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[40] *Based on a linear interpolation of 2012–2040 data.*

[41] *Based on a linear interpolation of 2012–2040 data.*

Potentially Significant Impact. The LAFD provides fire protection and emergency medical services for the Project Site. The closest LAFD fire station to the Project Site is Fire Station No. 27 located at 1327 North Cole Avenue in Los Angeles, approximately 0.4 mile southwest of the Project Site.[42] The Project would increase the building square footage on-site and introduce approximately 673 residents and a maximum of 73 employees to the Project Site.[43] Therefore, further analysis of this issue will be included in the EIR.

b. Police protection?

Potentially Significant Impact. Police protection for the Project Site is provided by the City of Los Angeles Police Department. The Project would introduce new residential and commercial uses to the site that would increase the density at the Project Site, and increase the residential and daytime population in the service area. This could result in the need for additional police services and associated facilities. Therefore, the EIR will provide further analysis of this issue.

c. Schools?

Potentially Significant Impact. The Project Site is located within the boundaries of the LAUSD. The LAUSD is divided into six local districts.[44] The Project Site is located in Local District–West.[45] The Project would include of the development of residential uses, which would generate a demand for educational services and school facilities. Therefore, the EIR will provide further analysis of this issue.

d. Parks?

Potentially Significant Impact. The development of residential uses as part of the Project would generate a new population at the Project Site that could utilize nearby parks and/or recreational facilities, possibly necessitating new parks. Thus, the EIR will provide further analysis of this issue.

e. Other public facilities?

Potentially Significant Impact. The development of residential uses as part of the Project would generate a new population that would generate a demand for library services provided by the

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[42] *Los Angeles Fire Department, Fire Station Locator, www.lafd.org/fire-stations/station-results?st=441&address=1546%20Argyle%20Ave, accessed March 15, 2017.*

[43] *The proposed 24,000 square feet of retail and restaurant uses would generate approximately 65 employees while the 27,000 square-foot grocery store option would generated approximately 73 employees based on the employee generation rate for "Neighborhood Shopping Center" land uses, which is 0.00271 employee per average square foot provided LAUSD's 2012 Developer Fee Justification Study, February 9, 2012, Table 11.*

[44] *Los Angeles Unified School District, Board of Education Districts Maps 2015–2016, http://achieve.lausd.net/Page/8652, accessed March 15, 2017.*

[45] *Los Angeles Unified School District, Board of Education Local District—West Map, May 2015.*

Los Angeles Public Library, possibly necessitating the construction of new libraries. Therefore, the EIR will provide further analysis of this issue.

XV. Recreation

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?

Potentially Significant Impact. See Response to Checklist Question XIV.d, above.

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?

Potentially Significant Impact. The Project would not include the development of public recreational facilities. However, the Project would introduce a new residential population to the Project Site that could utilize nearby recreational facilities, possibly necessitating the construction or expansion of new recreational facilities. Therefore, the EIR will provide further analysis of this topic.

XVI. Transportation/Traffic

Would the project:

a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Potentially Significant Impact. The Project proposes development which has the potential to result in an increase in daily and peak-hour traffic within the vicinity of the Project Site. In addition, construction of the Project has the potential to affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site. Once construction is completed, the Project's residents, employees, and visitors would generate vehicle and transit trips throughout the day. The resulting increase in the use of the area's transportation facilities could affect the capacity of the roadway and transit system. Therefore, further analysis of this issue will be provided in the EIR.

b. Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Potentially Significant Impact. In Los Angeles County, Metro administers the Congestion Management Program (CMP), a State-mandated program designed to address the impacts urban

congestion has on local communities and the region as a whole. The CMP provides an analytical basis for the transportation decisions contained in the State Transportation Improvement Program. The CMP for Los Angeles County requires an analysis of any Project that could add 50 or more trips to any CMP intersection or more than 150 trips to a CMP mainline freeway location in either direction during either the A.M. or P.M. weekday peak hours. Implementation of the Project has the potential to generate additional vehicle trips, which could potentially add more than 50 trips to a CMP roadway intersection or more than 150 trips to a CMP freeway segment. Therefore, further analysis of this issue will be provided in the EIR.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. The Project Site is not located within the vicinity of any private or public airport. In addition, the Project's maximum height of 85 feet would not create increased levels of risk with respect to air traffic. Therefore, no impact would occur and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. The Project's design does not include hazardous features. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. In addition, the development of the Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. Furthermore, the design and implementation of new driveways would comply with the City's applicable requirements, including emergency access requirements set forth by the LAFD. The Project design would also be reviewed by the Los Angeles Department of Building and Safety and the LAFD during the City's plan review process to ensure all applicable requirements are met. Moreover, the proposed uses would be consistent with the surrounding uses. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

e. Result in inadequate emergency access?

Less Than Significant Impact. 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, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. In addition, 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 right-of-ways. Further, 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 emergency access would be less than significant.

Operation of the Project would generate traffic in the Project vicinity and would result in some modifications to site access. However, the Project's driveways and internal circulation would be designed to incorporate all City Building Code, Fire Code, and LADOT 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 Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. In addition, based on the Project Site's location within a highly 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. The street system surrounding the Project Site is not considered substandard. The Project also would not include the installation of barriers that could impede emergency vehicle access. As such, the Project would not result in inadequate emergency access. Impacts would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Potentially Significant Impact. The Project Site is served by a variety of transit options. The development of the Project would increase demand for alternative transportation modes in the vicinity of the Project Site. Therefore, further analysis of the potential for the Project to conflict with adopted policies, plans, or programs regarding public transit, bicycle facilities, or pedestrian facilities will be provided in the EIR.

XVII. Tribal Cultural Resources

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.

Potentially Significant Impact. Approved by Governor Jerry Brown on September 25, 2014, AB 52 establishes a formal notification process for California Native American Tribes to identify potentially significant impacts to Tribal Cultural Resources, as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration on or after

July 1, 2015. 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 excavations to previously undisturbed depths. 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 notified all applicable tribes on June 6, 2017. Consultation was requested by the Gabrieleño Band of Mission Indians—Kizh Nation on June 20, 2017, and consultation began on June 28, 2017. Further analysis of this topic will be provided in the EIR.

XVIII. Utilities

Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Potentially Significant Impact. The City of Los Angeles Department of Public Works provides wastewater collection and treatment services for the Project Site. As is the case under existing conditions, wastewater generated during operation of the Project would be collected and discharged into existing sewer mains and conveyed to the Hyperion Water Reclamation Plant in Playa del Rey. The Project would result in increased wastewater generation from the Project Site. Therefore, further analysis of this topic in the EIR is required.

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Potentially Significant Impact. Water and wastewater systems consist of two components, the source of the water supply or place of sewage treatment, 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, further analysis of this issue in an EIR will be provided.

c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Potentially Significant Impact. See Response to Checklist Question IX.c, above. As discussed therein, the Project would involve the demolition of the existing uses, construction of new buildings, and the installation of new landscaped areas, which would have the potential to alter the existing drainage pattern of the Project Site and affect the amount of stormwater runoff. Therefore, further analysis of this issue will be included in the EIR.

d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Potentially Significant Impact. LADWP supplies water to the Project Site. The Project would increase the demand for water provided by LADWP. Therefore, further analysis of this issue in an EIR will be provided.

e. 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?

Potentially Significant Impact. See Response to Checklist Question XVII.b, above.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

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 are categorized as either Class III or unclassified 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 unclassified landfills.[46] Ten Class III landfills and one unclassified landfill with solid waste facility permits are currently operating within the County.[47] In addition, there are two solid waste transformation facilities within Los Angeles County that convert, combust, or otherwise process solid waste for the purpose of energy recovery.

In 2015, the City of Los Angeles disposed of approximately 2.53 million tons of solid waste at the County's Class III landfills and approximately 39,364 tons at transformation facilities.[48,49] The 2.53 million tons of solid waste accounts for approximately 2.62 percent of the total remaining capacity (96.45 million tons) for the County's Class III landfills open to the City.[50]

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

[47] *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2015 Annual Report, December 2016.*

[48] *These numbers represent waste disposal, not generation, and thus do not reflect the amount of solid waste that was diverted via source reduction and recycling programs within the City.*

[49] *County of Los Angeles, Department of Public Works, Solid Waste Information System, Detailed Solid Waste Disposal Activity Report By Jurisdictions by Los Angeles (Reporting Period: January 2016 to December 2016).*

[50] *(2.53 million tons ÷ 96.45 million tons) X 100 = 2.62 percent.*

The unclassified landfill serving the County is Azusa Land Reclamation. This facility currently has 57.56 million tons of remaining capacity and an average daily disposal rate of 846 tons per day.[51]

Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the Los Angeles County Countywide Integrated Waste Management Plan (ColWMP) 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.[52] Based on the most recent 2015 ColWMP Annual Report, the remaining total disposal capacity for the County's Class III landfills is estimated at 114.37 million tons.[53]

Based on the 2015 ColWMP Annual Report, the countywide cumulative need for Class III landfill disposal capacity within the next 15 years will not exceed the 2015 remaining permitted Class III landfill capacity of 114 million tons. Nonetheless, while there is no expected daily landfill capacity shortfall during the planning period, there are constraints that may limit the accessibility of Class III landfill capacity. These constraints include wasteshed boundaries, geographic barriers, weather, and natural disasters. Therefore, the Annual Report evaluated seven scenarios and determined that the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with six of the scenarios. Only the scenario involving utilization of permitted in-county disposal capacity only would result in a shortfall. The Annual Report also concluded that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue 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 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 of Los Angeles implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling.[54] The City is currently diverting 76 percent of its waste from landfills.[55] The City has also adopted the goal of achieving 90 percent diversion by 2025.

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[51] *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2015 Annual Report, December 2016.*

[52] *County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2014 Annual Report, December 2015.*

[53] *This total excludes the estimated remaining capacity at the Puente Hills Landfill, which closed on October 31, 2013.*

[54] *City of Los Angeles, Solid Waste Integrated Resource Plan FAQ; www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPFAQS.pdf, accessed February 7, 2017.*

[55] *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=1885068648914941 1#!, accessed January 13, 2017.*

Construction

The Project Site is currently improved with six commercial buildings totaling approximately 61,816 square feet and their associated parking areas. 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 Los Angeles County and within the Class III landfills open to the City. As shown in Table B-1 on page B-47, after accounting for mandatory recycling, the Project would result in approximately 1,339 tons of construction and demolition waste. Given the remaining permitted capacity the Azusa Land Reclamation facility, which is approximately 57.56 million tons, as well as the remaining capacity of Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

Operation

As shown in Table B-2, Estimated Project Solid Waste Generation, on page B-48, upon full buildout, the Project would generate approximately 4,145 pounds of solid waste per day. As shown in Table B-2, the Project would result in an increase in the amount of solid waste currently generated by the existing uses. Specifically, with implementation of the Project, the Project Site would generate a net increase of approximately 2,376 pounds of solid waste per day or approximately 434.35 tons of solid waste per year. However, it is noted that 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 or more cubic yards per week of waste, and multi-family housing with five or more units, to adopt recycling practices, or implementation of the City's upcoming Zero Waste LA franchising system, 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.[56] The estimated annual net increase in solid waste that would be generated by the Project represents approximately 0.02 percent of the City's annual solid waste disposal and less than 0.001 percent of the remaining capacity for the County's Class III landfills open to the City of Los Angeles.

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. Additionally, 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. Therefore,

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[56] *The Zero Waste LA Franchise System would divide the City into 11 zones and designate a single trash hauler for each zone. Source: LA Sanitation, "Zero Waste LA—Franchise," www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwlaf;jsessionid=nJABd_CcLHL4DCOkGSCJWv1buV9atyQtoUkP50TwYHe5jczy6OaK!782088041!NONE?_afrLoop=17071741526736871&_afrWindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D17071741526736871%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dge1mehnju_4, accessed March 24, 2017.*

Table B-1
Project Demolition and Construction Waste Generation

Use	Size	Generation Rate (lbs/sf)[a]	Total (tons)[b]
Existing			
Warehouse	32,634 sf	155	2529.14
Office	15,182 sf	155	1176.61
Commercial	14,000 sf	155	1085.00
Subtotal for Demolition	***61,816 sf***		***4,790.74***
Proposed[c]			
Residential (276 du)	237,159 sf	4.38	519.38
Restaurant	15,000 sf	3.89	29.18
Retail	9,000 sf	3.89	17.51
Subtotal for Construction	***261,159 sf***		***566.06***
Total Prior to Recycling			**5,356.80**
Total After 75-Percent Recycling			**1,339.20**

lb = 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, Table 3, Table 4 and Table 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types.*

[b] *1 ton = 2,000 pounds*

[c] *For the purposes of a conservative analysis, the larger residential square footage for the Project with the restaurant/retail option is used to calculate the Project's estimated construction waste generation since the generation rate for residential construction debris is higher.*

Source: Eyestone Environmental, 2017.

impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

g. Comply with federal, state, and local statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), 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

Table B-2
Estimated Project Solid Waste Generation

Building	Size	Generation Rate[a]	Total (lb/day)
Existing			
Commercial	61,816 sf	10.53 lb/emp/day	1,769[b]
Total Existing			***1,769***
Proposed			
Multi-Family Residential	276 du	12.23 lb/du/day	3,376
Commercial[c]	27,000 sf	10.53 lb/emp/day	769[d]
Total with Implementation of Project			***4,145***
Total Net Generation			**2,376**

du = dwelling unit

emp = employee

sf = square feet

lb = pound

[a] *CalRecycle, Estimated Solid Waste Generation Rates, www2.calrecycle.ca.gov/Waste Characterization/General/Rates, accessed October 21, 2016.*

[b] *Los Angeles Unified School District, 2012 Developer Fee Justification Study, February 9, 2012, Table 11. Based on the employee generation rates for "Neighborhood Shopping Centers" (0.00271 employee per average square foot), the existing 61,816 square feet of commercial uses would result in 168 employees.*

[c] *For the purposes of a conservative analysis, the larger commercial square footage for the grocery store option is used to calculate the Project's estimated solid waste generation.*

[d] *Los Angeles Unified School District, 2012 Developer Fee Justification Study, February 9, 2012, Table 11. Based on the employee generation rates for "Neighborhood Shopping Centers" (0.00271 employee per average square foot), the proposed 27,000 square feet of commercial uses would result in 73 employees.*

Source: Eyestone Environmental, 2017.

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 Los Angeles 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 "blueprint" of the plan builds on the key elements of existing reduction and recycling programs and infrastructure, and combines them with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, renewable fuels, chemicals, and energy. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. More recently, in October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste[57] on and after April 1, 2016, depending on the amount of waste generated per

[57] *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.*

week. 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. Mandatory recycling of organic waste is the next step toward achieving California's recycling and greenhouse gas emission goals. Organic waste such as green materials and food materials are recyclable through composting and mulching, and through anaerobic digestion, which can produce renewable energy and fuel. Reducing the amount of organic materials sent to landfills and increasing the production of compost and mulch are part of the AB 32 (California Global Warming Solutions Act of 2006) Scoping Plan.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.[58] 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 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.

XIX. Mandatory Findings of Significance

a. Does the project have the potential to 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, 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. No sensitive plant or animal community or special status species occur on the Project Site. However, as indicated above, the Project does have the potential to result in impacts to cultural resources. Therefore, further evaluation of this topic in an EIR is required.

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 within the vicinity of the

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

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; greenhouse gas emissions; land use and planning; noise; public services (fire protection, police protection, schools, parks, and other public services); transportation/circulation; tribal cultural resources; and utilities (water, wastewater, and energy).

With regard to cumulative effects with respect to aesthetics, agricultural resources, biological resources, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, population and housing, and solid waste, the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable. Specifically, with respect to aesthetics, pursuant to SB 743 and ZI 2452, the Project's impacts would not be significant. Furthermore, related projects would be reviewed on a case-by-case basis by the City to comply with LAMC requirements regarding building heights, setbacks, massing and lighting or, for those projects that require discretionary actions, to undergo site-specific review regarding building density, design, and light and glare effects. Thus, cumulative impacts associated with aesthetics would be less than significant

With respect to agricultural resources and mineral resources, the Project would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts. With respect to biological resources, geology and soils, hazards and hazardous materials, and hydrology and water quality, these resource areas are generally site-specific and would be evaluated within the context of each individual project. Furthermore, related projects would be required to comply with existing regulatory requirements and the City's building permit review and approval process, which address these subjects. In addition, with regard to hydrology, the Project would not increase peak flows during the 50-year storm events. Therefore, the Project would not contribute to a cumulative impact on downstream hydrology infrastructure.

With regard to population and housing, the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable. As discussed in the analysis above, the 673 estimated net new residents generated by the Project would represent approximately 0.35 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2016 and 2023, and the 276 new residential units would constitute up to approximately 0.30 percent of the housing growth forecasted between 2016 and 2023. Furthermore, the Project would not result in a notable indirect increase in demand for new housing, and any new demand, should it occur, would be minor in the context of forecasted growth for the City of Los Angeles and the Hollywood Community Plan area.

With regard to solid waste, the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable. As discussed above, the estimated annual net increase in solid waste that would be generated by the Project represents approximately 0.02 percent of the City's annual solid waste disposal and less than 0.001 percent of the remaining capacity for the County's Class III landfills open to the City of Los Angeles. As previously stated, 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 2015 CoIWMP Annual Report, the County anticipates that future disposal needs can be adequately met for the next 15 years (i.e., 2030). 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 these topics would be less than significant, and no mitigation measures are required. No further evaluation of these topics in an EIR is required.

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; greenhouse gas emissions; land use and planning; noise; public services (fire protection, police protection, schools, parks, and other public services); transportation/circulation; tribal cultural resources; and utilities (water, wastewater, and energy). As a result, these potential effects will be analyzed further in the EIR.