Sunset Gower Studios Enhancement Plan

Case Number: ENV-2017-5091-EIR

Project Addresses: 6010, 6050 and 6060 Sunset Boulevard, 1455 North Beachwood Drive, 1455 Gordon

Street, and 1438 and 1440 North Gower Street, Los Angeles, CA 90028

Community Plan Area: Hollywood

Council District: 13—Mitch O'Farrell

Project Description: The Project would demolish approximately 160,500 square feet of existing floor area and preserve and enhance portions of the existing Sunset Gower Studios. Specifically, the Project would develop new studio-related creative office, production office/production support and storage uses within three new buildings. The proposed buildings would total approximately 628,000 square feet of floor area and would range from five to 18 stories, up to 300 feet in height. Overall, the Project would result in a net increase of approximately 467,500 square feet of floor area.

The Project would provide parking, as required by the Los Angeles Municipal Code, and provide up to 1,335 new parking spaces, including 525 spaces within a new parking structure with six above-grade levels and three subterranean levels, 531 spaces within three subterranean parking levels below the existing basecamp and below a proposed 1,450-square-foot bicycle parking facility, and 279 spaces within three subterranean levels below one of the new buildings.

PREPARED FOR:

City of Los Angeles
Department of City Planning

PREPARED BY:

Eyestone Environmental

APPLICANT:

Hudson Pacific Properties, Inc.

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INITIAL STUDY

Executive Summary

Project Title: Sunset Gower Studios Enhancement Plan **Environmental Case Number:** ENV-2017-5091-EIR **Related Cases:** ZA-2017-5090-VCU-CU-SPR, VTT-80310

Project Location: 6010, 6050 and 6060 Sunset Boulevard, 1455 North Beachwood Drive, 1455 Gordon Street, and 1438 and 1440 North Gower Street, Los Angeles, CA 90028

Lead City Agency: City of Los Angeles Department of City Planning

Staff Contact Name and Address: Alejandro Huerta, 200 North Spring Street, Room 750,

Los Angeles, CA 90012

Email: alejandro.huerta@lacity.org **Phone Number:** (213) 978-1454

Applicant Name and Address: Hudson Pacific Properties, Inc., 11601 Wilshire Boulevard,

9th Floor, Los Angeles, CA 90025 **Phone Number:** (323) 468-3258

PROJECT DESCRIPTION:

The Project proposes to preserve and enhance portions of the existing Sunset Gower Studios and develop new studio-related creative office, production office/production support and storage uses within three new buildings that would comprise approximately 628,000 square feet of floor area. The proposed buildings would range from five to 18 stories up, to 300 feet in height. The Project would provide up to 1,335 new parking spaces, including up to 525 spaces within a new parking structure with six above-grade levels and three subterranean levels, up to 531 spaces within three subterranean parking levels below the existing basecamp and below a proposed 1,450-square-foot bicycle parking facility, and up to 279 spaces within three subterranean levels below one of the new buildings. Overall, the Project would result in a net increase of approximately 467,500 square feet of floor area upon buildout of the Project and an associated floor area ratio of 1.47:1. For a detailed description of the Project, refer to the attached Project Description.

ENVIRONMENTAL SETTING:

The Project Site is the 16.5-acre Sunset Gower Studios at 1438 North Gower Street, bounded by Sunset Boulevard to the north, Gordon Street to the east, Fountain Avenue to the south, and Gower Street to the west. The immediate vicinity includes historic and modern low- to high-rise buildings occupied by commercial/retail uses, tourist and entertainment-related commercial/retail uses, offices, hotels, educational institutions, and single-family and multi-family residences such as the Sunset Gower Plaza, Siren Studios, the EastWest Studios, Emerson College, and the Columbia Square Complex. For additional detail, refer to the attached Project Description.

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?

No.

Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement.):

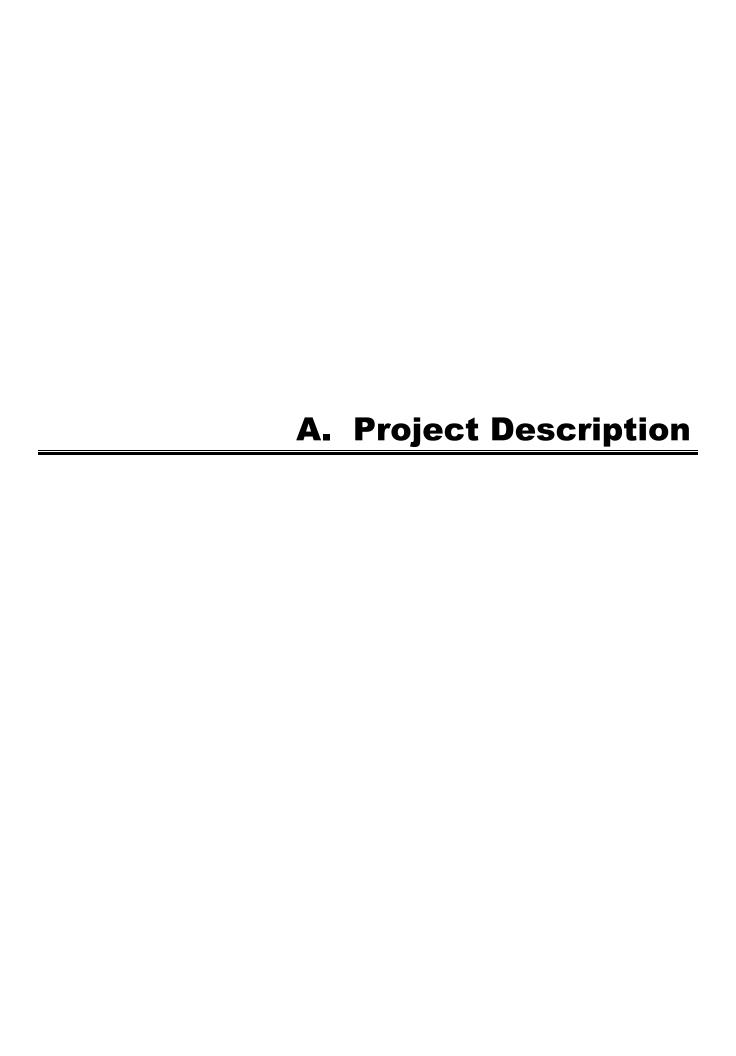
Potentially including, but not limited to, the Regional Water Quality Control Board, South Coast Air Quality Management District.

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 ☐ Agriculture and Forestry Resources ☐ Hydrology / Water Quality □ Land Use / Planning ☐ Biological Resources □ Utilities / Service Systems □ Cultural Resources ☐ Geology / Soils □ Population / Housing □ 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.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - 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.



Initial Study

Project Description

A. Project Summary

The Sunset Gower Studios Enhancement Plan (the Project) proposes improvements, which could occur in phases, on a 15.9-acre (693,432 square feet) portion of the existing 16.5-acre Sunset Gower Studios (Project Site).¹ The Project Site is currently occupied by creative offices, production support, and sound stages totaling 550,300 square feet of floor area.² Approximately 1,400 square feet of existing service areas are also located within the Project Site.³

The Project would preserve and enhance portions of the existing Sunset Gower Studios and develop new studio-related creative office, production office/production support and storage uses within three new buildings that would result in approximately 628,000 square feet of floor area. The three new buildings would range from five to 18 stories, up to 300 feet in height. The Project would provide parking in accordance with the requirements of the Los Angeles Municipal Code (LAMC) and could provide up to 1,335 new parking spaces, consisting of up to 525 spaces within a new parking structure with six above-grade levels and three subterranean levels, up to 531 spaces within three subterranean parking levels below the existing basecamp⁴ and below a proposed 1,450-square-foot bicycle parking facility, and up to 279 spaces within three subterranean levels below one of the new buildings. The existing 1,398 parking spaces would remain. Thus, upon buildout of the Project, up to 2,733 parking spaces could be provided within the Project Site.

The Project would include landscaped courtyards and walkways to connect the proposed buildings. The Project would remove approximately 160,500 square feet of existing floor area, consisting of approximately 125,500 square feet of creative office floor area, 29,400 square feet of production support floor area, and 5,600 square feet of sound stage floor area. The approximately

The northwest corner of Sunset Gower Studios (1448 N. Gower Street) is not included in the 15.9-acre portion of the Project Site because it is under separate ownership.

² All square-footage numbers represent floor area as defined by the Los Angeles Municipal Code. Specifically, floor area includes the 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 dedicated to bicycle parking, space for the landing and storage of helicopters, and basement storage areas.

The existing service areas totaling approximately 1,400 square feet do not meet the LAMC definition of floor area and are not included in the total existing floor area of the Project Site.

⁴ The existing basecamp comprises the exterior surface production parking and production staging area located in the interior of the Project Site.

1,400 square feet of existing service areas would also be removed. Overall, the Project would result in a net increase of approximately 467,500 square feet of floor area.

B. Environmental Setting

1. Project Location

The approximately 16.5-acre Sunset Gower Studios is located at 1438 North Gower Street within the Hollywood Community Plan Area of the City of Los Angeles. The Sunset Gower Studios is bounded by Sunset Boulevard to the north, Gordon Street to the east, Fountain Avenue to the south, and Gower Street to the west. A vicinity map is provided in Figure A-1 on page A-3, and an aerial view of the Project Site and vicinity is included in Figure A-2 on page A-4.

2. Background and Existing Conditions

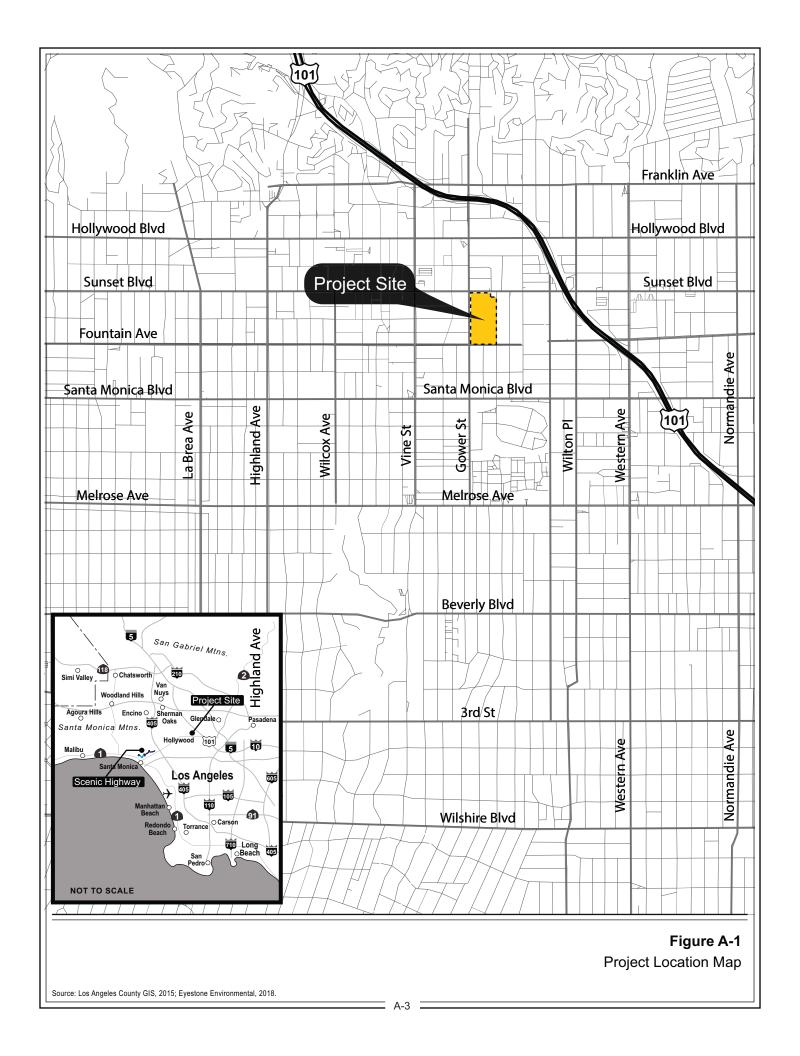
a. Project Site Background

The Sunset Gower Studios has been developed with studio-related uses since 1912. Columbia Pictures occupied the Project Site from 1920 until 1972, when Columbia Pictures relocated to Burbank. In 1976, the Pick Vanoff Company purchased the studio lot and the name was changed to Sunset Gower Studios. At that time, the Sunset Gower Studios became a rental facility for independent film companies and includes facilities for music rehearsal. In 2004, Sunset Gower Studios was purchased by GI Partners and, since 2007, has been owned by Hudson Pacific Properties.

b. Existing Project Site Conditions

As summarized in Table A-1 on page A-5, existing development within the Project Site includes approximately 550,300 square feet of floor area, consisting of approximately 319,300 square feet of creative office space, 56,000 square feet of production support, and approximately 175,000 square feet of sound stages. The Project Site also includes approximately 1,400 square feet of service areas. In addition, the Project Site includes three parking structures providing a total of 1,398 parking spaces. The northwest corner of Sunset Gower Studios (1448 N. Gower Street) is not included in the 15.9-acre portion of the Project Site because it is under separate ownership. The existing vacant structure located at 1448 N. Gower Street was previously used as a restaurant.

A site plan of the existing uses within the Project Site is provided in Figure A-3 on page A-6. The majority of the sound stages are located along Gower Street, and the parking structures are located along Gordon Street, with the creative office and production support uses dispersed in buildings that are mostly centrally located on the Project Site.



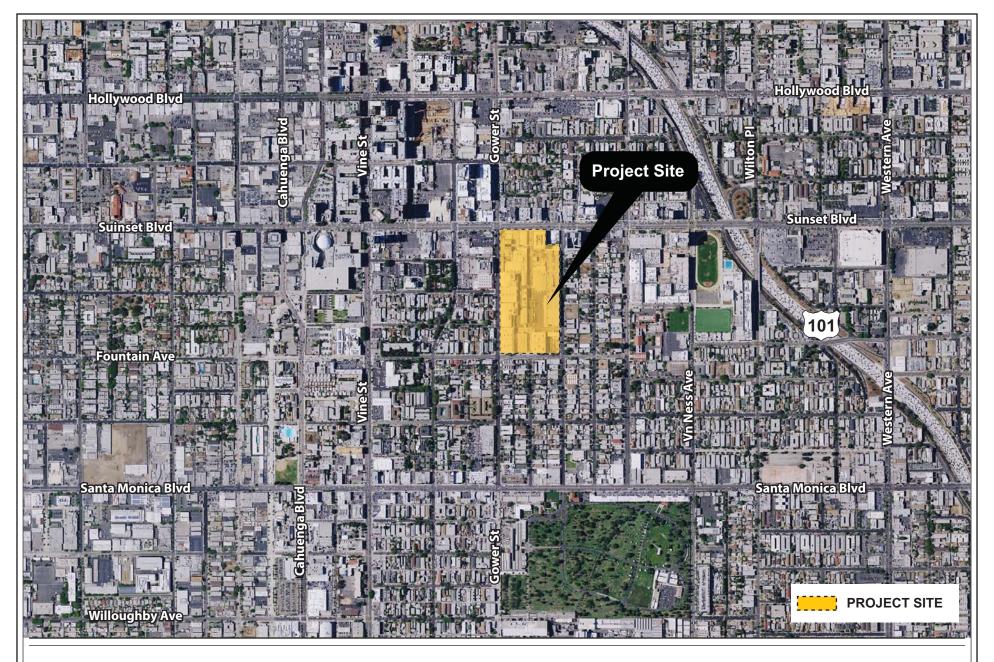


Figure A-2
Aerial of the Project Vicinity

Source: Apple Maps, 2017; Eyestone Environmental, 2018.

Table A-1
Existing Uses on the Project Site

Use	Total (sf) ^{a,b}
Creative Office	319,300 sf
Production Support	56,000 sf
Sound Stages	175,000 sf
Total Existing	550,300 sf

sf = square feet

Source: Gensler, 2017.

The Project Site contains limited to sparse landscaping in the form of non-native/non-protected trees,⁵ hedges, and shrubs. The Project Site is currently fenced off, with access limited to the tenants and their guests.

Vehicular access to the Project Site is provided along Sunset Boulevard at North Beachwood Drive and along Gordon Street through gated entries. Emergency and limited access is provided along Fountain Avenue. Limited pedestrian access is also provided along Gower Street through a gated entry.

c. Land Use and Zoning

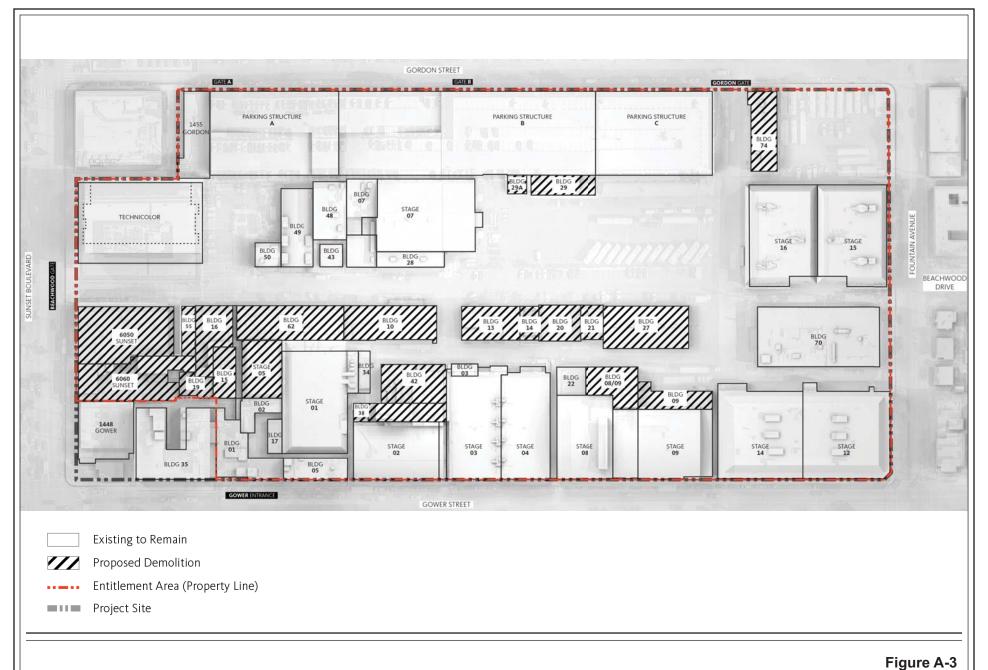
The Project Site is located within the Hollywood Community Plan Area and has a Limited Manufacturing General Plan land use designation.

The Project Site is zoned M1-1 (Limited Industrial, Height District 1). The M1 Zone permits MR1 uses (Restricted Industrial), limited industrial and manufacturing uses, any enclosed C2 use, wireless telecommunications, and household storage.

The City of Los Angeles Protected Tree Regulations apply to Oak, Southern California Black Walnut, Western Sycamore, and California Bay tree species that are native to Southern California, and excludes trees grown by a nursery or trees planted or grown as part of a tree planting program.

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."

^b The existing service areas totaling approximately 1,400 square feet do not meet the LAMC definition of floor area and are not included in the total existing floor area of the Project Site



Existing Site and Proposed Demolition Plan

Height District 1 within the M1 Zone has no height limit with a maximum Floor Area Ratio (FAR) of 1.5:1. The Project Site is located in a Transit Priority Area, as defined by Zoning Information File 2452.⁶

3. Surrounding Land Uses

The Project Site is within the highly urbanized Hollywood Community Plan Area, which is characterized by a mix of uses within a range of building types, such as historic and modern low- to high-rise buildings with commercial/retail uses, tourist and entertainment-related commercial/retail uses, offices, hotels, educational institutions, and single-family and multi-family residences. In general, the major arterials in the vicinity of the Project Site, including Sunset Boulevard, Hollywood Boulevard, and Santa Monica Boulevard, are lined with commercial, industrial, and some residential mixed-use developments, with residential neighborhoods primarily interspersed between the major arterials.

Land uses surrounding the Project Site specifically include retail and restaurant uses within the Sunset Gower Plaza, Siren Studios, a motel, and other commercial/retail uses to the north, along Sunset Boulevard; the EastWest Studios, Emerson College, and single- and multi-family residential uses to the east, along Gordon Street; single- and multi-family residential and commercial uses to the south, along Fountain Avenue; and commercial, retail, restaurant, and multi-family residential uses to the west, along Gower Street. Also to the west of the Project Site is an existing vacant structure located at the southeast corner of Sunset Boulevard and Gower Street that was previously used as a restaurant.

4. Freeways and Transit

As shown in Figure A-1 on page A-3, primary regional access in the vicinity of the Project Site is provided by the Hollywood Freeway (US-101), which runs generally north—south approximately 0.4 mile east of the Project Site. Major arterials providing regional access to the Project Site and vicinity include Sunset Boulevard, Hollywood Boulevard, Van Ness Avenue, and La Brea Avenue. As illustrated in Figure A-4 on page A-8, the Project Site and vicinity are also well served by public transit provided by the Los Angeles County Metropolitan Transit Authority (Metro) and the Los Angeles Department of Transportation DASH. Several bus stops are located along Sunset Boulevard and Gower Street, including Metro bus line 2, DASH Hollywood, and DASH Hollywood/Wilshire. The Metro Hollywood/Vine Station is located approximately 0.6 mile northwest of the Project Site.

The City's Zone Information and Map Access System (ZIMAS) confirms the Project Site's location within a Transit Priority Area, as defined in the City's Zoning Information File No. 2452.

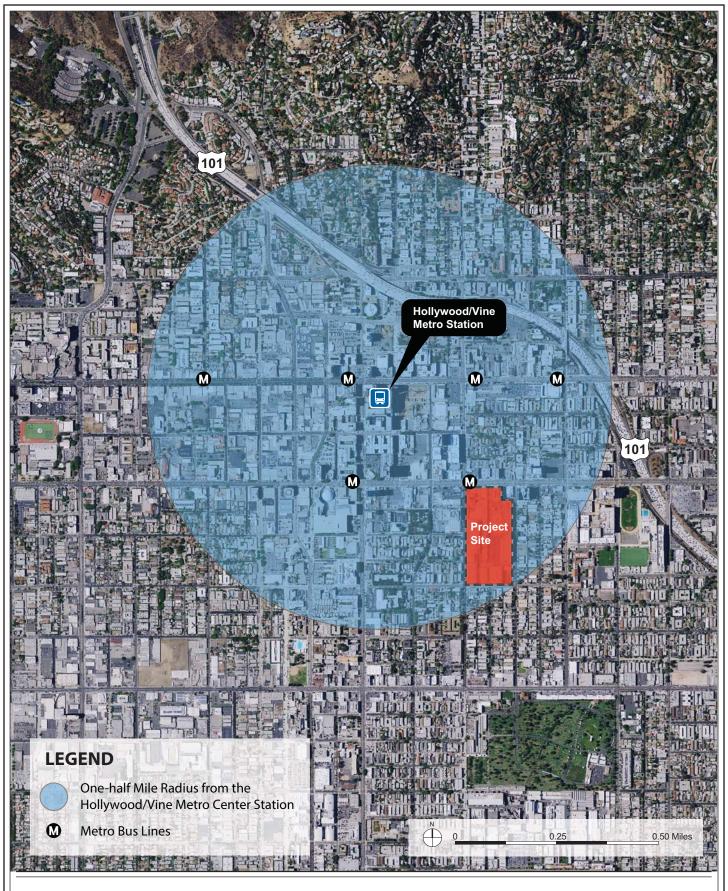


Figure A-4
Location of Project Site within a Transit Priority Area

Source: Eyestone Environmental, 2018.

C. Description of the Project

1. Project Overview

The proposed studio-related creative office, production office/production support and storage uses would be provided within three new buildings (referred to herein as Buildings A, B, and C). To build the proposed improvements, the Project would demolish approximately 160,500 square feet of existing floor area, consisting of approximately 125,500 square feet of creative office floor area, 29,400 square feet of production support floor area, and 5,600 square feet of sound stage floor area, as shown in Figure A-3 on page A-6. The approximately 1,400 square feet of existing service areas would also be removed. Three buildings on the Project Site could be eligible for historic status. The Project proposes to retain two of these: the building at 1440 Gower Street and the building at 1455 Gordon Street. The third building, at 6050 Sunset Boulevard, would be demolished.

Overall, as shown in Table A-2 on page A-10, the Project would remove approximately 160,500 square feet of existing floor area and develop approximately 628,000 square feet of floor area, resulting in a net increase of approximately 467,500 square feet of floor area. The Project would have a FAR of 1.47:1, which would be below the allowable FAR of 1.5:1. Upon buildout of the Project, a total of up to 2,733 parking spaces (including the existing 1,398 parking spaces to remain) would be provided within the Sunset Gower Studios. A conceptual site plan of the proposed development is provided in Figure A-5 on page A-11.

As shown in Figure A-5, Building A would be located along Sunset Boulevard, and Buildings B and C would be centrally located within the Project Site. The proposed parking structure would be located in the southeastern portion of the Project Site, at the corner of Gordon Street and Fountain Avenue.

Building A would contain approximately 478,950 square feet of creative office space. Building A would be 18 stories with a height of 300 feet. Three levels of subterranean parking would be provided in Building A. Building B would contain approximately 68,600 square feet of creative office and production support space. Building B would be five stories with a height of approximately 89 feet. Building C would contain approximately 79,000 square feet of creative office and production support space. Building C would be six stories with a height of approximately 89 feet. As illustrated in Figure A-5, the Project would locate the tallest buildings along Sunset Boulevard, similar to other developments in the near vicinity. The proposed buildings would be designed in a contemporary architectural style. Building A would feature varying façade planes articulated by sawtooth windows, glass curtain walls, and exposed black steel beams. Buildings B and C would also feature varying façade planes articulated by steel-frame windows, curtain walls, exposed black steel beams, textured concrete, and polycarbonate panels.

Because there are potential historical resources on the Project Site, a Historic Resources Plan would be prepared and implemented as part of the Project to guide the preservation of a majority of the Project Site's historical resources, as well as construction of new structures. The Historic Resources Plan would include detailed guidelines for the rehabilitation and preservation of

Table A-2
Summary of Proposed Floor Area

Land Use	Existing	Proposed Demolition	Proposed Construction	Net New
Creative Office	319,300 sf	(125,500 sf)	599,350 sf	473,850 sf
Production Support	56,000 sf	(29,400 sf)	27,200 sf	(2,200) sf
Sound Stages	175,000 sf	(5,600 sf)	_	(5,600) sf
Total	550,300 sf	(160,500 sf)	628,000 sf ^a	467,500 sf ^a

sf = square feet

Source: Eyestone Environmental, 2017.

most of the existing buildings that contribute to a potential Historic Studio District following Project development.

2. Access and Parking

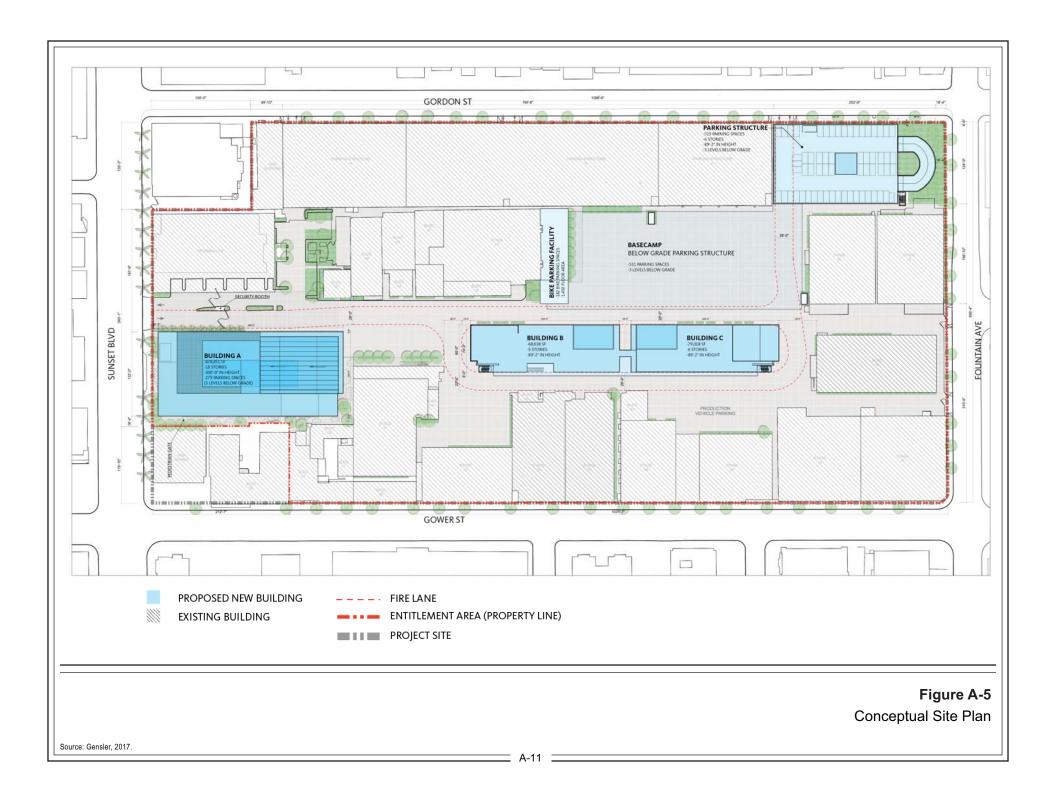
As shown in Figure A-5 on page A-11, existing vehicular access to the Project Site would be maintained and would be provided via driveways along Sunset Boulevard and Gordon Street. Pedestrian-only access would also continue to be provided along Gower Street.

The Project would provide parking in accordance with the requirements of the LAMC and could provide up to 1,335 new parking spaces, consisting of up to 525 spaces within a new parking structure with six above-grade levels and three subterranean parking levels, up to 531 spaces within three subterranean parking levels below the existing basecamp and below a proposed 1,450-square-foot bicycle parking facility, and up to 279 spaces within three subterranean levels below Building A. The proposed subterranean parking levels would extend to a maximum depth of 42 feet. The Project would also comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the new parking facilities. In addition, in accordance with the requirements of the LAMC, approximately 284 bicycle parking spaces consisting of 102 short-term spaces and 182 long-term spaces would be provided.

3. Internal Landscape Areas

As shown in Figure A-6 on page A-12, the landscape plan would create a variety of landscaped gathering areas to enhance the existing pedestrian environment internal to the Project Site, including a paseo, a central plaza area, courtyards, and roof gardens and terraces. These areas would include trees, accent paving, seating, and other landscaping features throughout the Project Site.

Includes proposed 1,450-square-foot bicycle parking facility.



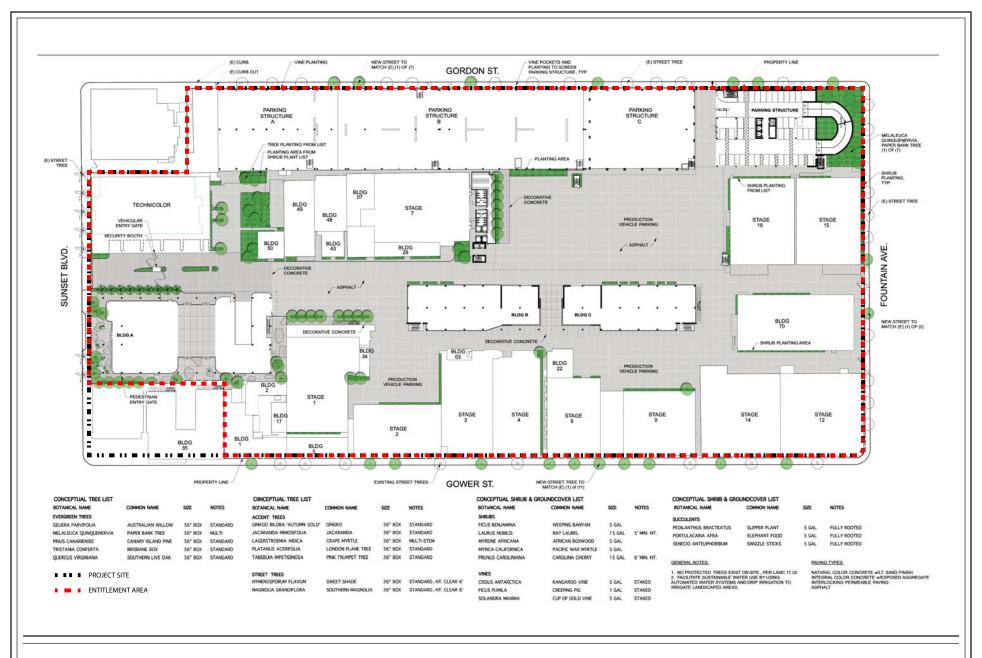


Figure A-6
Conceptual Landscape Plan

Source: Gensler, 2017.

4. Lighting and Signage

The Project would include low-level exterior lights adjacent to the proposed buildings and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the Project Site. All lighting would comply with current energy standards and codes, as well as design Requirements, while providing appropriate light levels. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light trespass from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction.

Specifically, all on-site exterior lighting would be automatically controlled via photo sensors to illuminate only when required and would be shielded or directed toward areas to be illuminated to limit spill-over onto nearby residential uses. Where appropriate, interior lighting would be equipped with occupancy sensors and/or timers that would automatically extinguish lights when no one is present. All exterior and interior lighting shall meet high energy efficiency requirements utilizing light-emitting diode (LED) or efficient fluorescent lighting technology.

Proposed signage would be designed to be aesthetically compatible with the existing and proposed architecture of the Project Site and would comply with the Los Angeles Municipal Code. Proposed signage would include identity signage, building and tenant signage, and general ground level and way-finding pedestrian signage. No off premises or billboard advertising is proposed as part of the Project. The Project would not include signage with flashing, mechanical, or strobe lights. New signage would be architecturally integrated into the design of the proposed buildings and would establish appropriate identification for the proposed uses. Project signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off-site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

5. Project Sustainability

The Project would be constructed to incorporate environmentally sustainable design features required by the Los Angeles Green Building Code and the sustainability intent of the U.S. Green Building Council's Leadership in Energy Efficiency and Design (LEED) green building program to achieve LEED Silver certification or equivalency. LEED standards would be incorporated to reduce energy and water usage and waste, thereby reducing associated greenhouse gas emissions. The Project would incorporate, but not be limited to, the following features to support and promote environmental sustainability: Energy Star appliances; reduced indoor water use by at least 20 percent; plumbing fixtures (water closets and urinals) and fittings (faucets) that comply with the performance requirements specified in the Green Building Code; weather-based irrigation system; and water-efficient landscaping. The Project would also utilize sustainable planning and building strategies and would incorporate the use of environmentally friendly materials, such as non-toxic paints and recycled finish materials wherever possible.

In accordance with CEQA Guidelines Appendix F, the Environmental Impact Report (EIR) to be prepared for the Project will provide further information on energy conservation, energy implications, and the energy-consuming equipment and processes that would be used during construction and operation of the Project. 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. While development of the Project would not be anticipated to cause the wasteful, inefficient, and unnecessary consumption of energy, further analysis of the Project's consistency with Appendix F will be provided in the EIR.

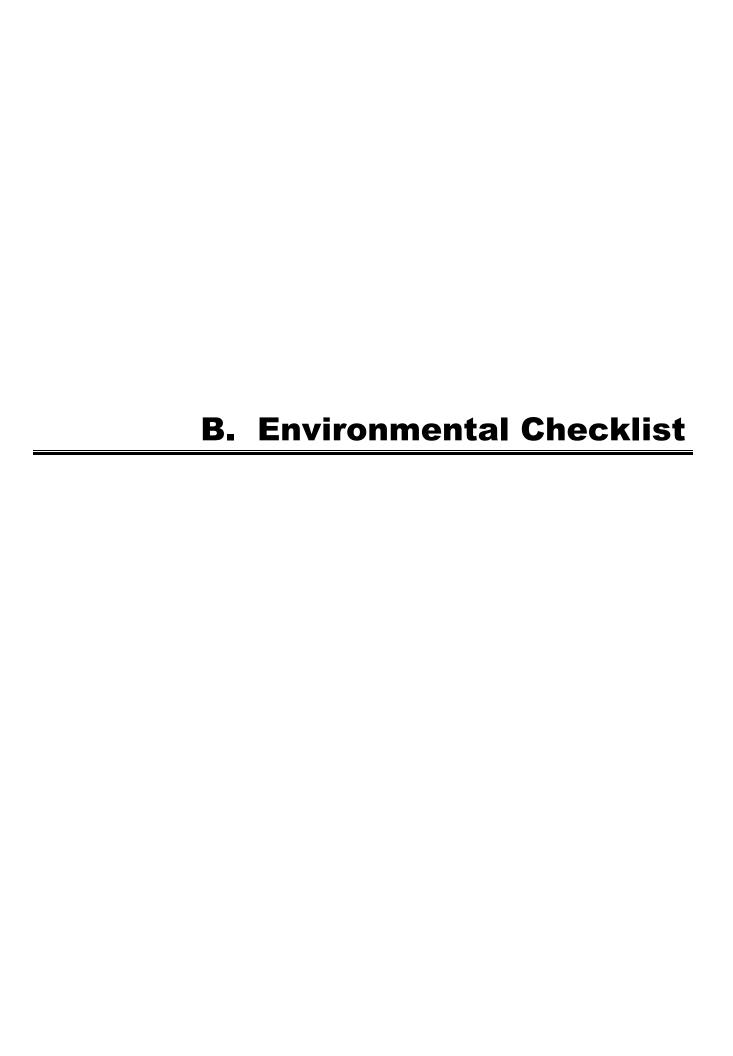
6. Anticipated Construction Schedule

Project construction could occur in phases, with buildout in 2028. Approximately 211,000 cubic yards of soil would be hauled from the Project Site during the excavation phase. The haul route from the Project Site is anticipated to be via Sunset Boulevard to the Hollywood Freeway (US-101) to the east.

D. Requested Permits and Approvals

The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not limited to, the following:

- Pursuant to LAMC Sections 12.24-T,3(B) and 12.24-U,14, a Major Development Project Conditional Use Permit to permit a Major Development Project;
- Pursuant to LAMC Section 12.24-W,19, a Conditional Use Permit to permit Floor Area Ratio Averaging in Unified Developments;
- Pursuant to LAMC Sections 12.22-A,23 and 12.24-W,27, a Commercial Corner Development Conditional Use Permit to permit a Commercial Corner Development;
- Pursuant to LAMC Section 17.15, Vesting Tentative Tract Map No. 80310 for merger and subdivision purposes; and
- Pursuant to LAMC Section 16.05, Site Plan Review to authorize the Project's new buildings and uses.



INITIAL STUDY

Environmental Checklist

			Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I.	AES	STHETICS. Would the project:				
		Have a substantial adverse effect on a scenic vista?				
		Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				
		Substantially degrade the existing visual character or quality of the site and its surroundings?				
		Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				

Senate Bill 743 [Public Resources Code Section 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 shall not be considered significant impacts on the environment." Public Resources Code 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." Public Resources Code 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." Public Resources Code 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. Public Resources Code 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 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."

Pursuant to Public Resources Code Section 21099, the Project is an employment center project because it is located on property that is zoned to permit commercial uses with a maximum FAR greater than 0.75. In addition, the Project Site is located on an infill site² that is less than 0.5 mile from several bus lines along Sunset Boulevard, including bus transit service operated by the Los Angeles County Metropolitan Transportation Authority (Metro) and the Los Angeles Department of Transportation (LADOT). Therefore, the Project Site is located in a transit priority area as defined in Public Resources Code Section 21099. The City's Zone Information and Map Access System (ZIMAS) also confirms the Project Site's location within a transit priority area, as defined in the City's Zoning Information File ZI No. 2452.³ Thus, any aesthetic impacts that might be identified for the Project would not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099. Nevertheless, the following aesthetics analysis is provided for information purposes only. The discussion considers factors from the City's *L.A. CEQA Thresholds Guide*.

Would the project:

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

Less Than Significant Impact. A scenic vista is a panoramic view of a valued visual resource. Based on the *L.A. CEQA Thresholds Guide*, panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. According to the *L.A. CEQA Thresholds Guide*, panoramic views are typically associated with vantage points looking out over a section or urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley mountain range, the ocean, or other water bodies. The *L.A. CEQA Thresholds Guide* provides the following factors to consider in evaluating a project's effect on a scenic vista: (1) the nature and quality of recognized or valued views (such as natural topography, settings, man-made or natural features of visual interest, and resources such as mountains or the ocean); (2) whether the project affects views from a designated scenic highway, corridor, or parkway; (3) the extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment); and (4) the extent to which the

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

Infill can be defined as the use of land within a built-up area for further construction. The Project would be developed on a portion of the existing Sunset Gower Studios, which is within a built-up area in the City of Los Angeles. Therefore, the Project is considered an infill development.

City of Los Angeles, Zone Information and Map Access System (ZIMAS), http://zimas.lacity.org/, accessed December 14, 2017.

project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point. Publicly available scenic vistas of the Hollywood Hills and the Hollywood sign, approximately 2.3 to 2.5 miles to the north of the Project Site, are available from Gower Street, the western boundary of the existing Sunset Gower Studios. However, the Project does not propose any new development along Gower Street. Therefore, views of the Hollywood Hills and Hollywood sign would remain along the length of Gower Street. There would be no publicly available scenic vistas of the Hollywood Hills from Sunset Boulevard because the area is highly urbanized and developed with one- to four-story buildings (i.e., Siren Studios buildings at 6087, 6069, 6061, 6063 Sunset Boulevard) on the north side of Sunset Boulevard. Therefore, views are already obstructed along Sunset Boulevard. Finally, while there are views of the Hollywood Hills along the eastern boundary, Gordon Street, of the Project Site, these views would not be obstructed by the proposed development since the proposed garage structure would not encroach on the public right-ofway. Overall, as the area is fully developed and highly urbanized, the Project would not have a substantial adverse effect on a publicly available scenic vista. Moreover, pursuant to Senate Bill 743 and ZI No. 2452, the Project's aesthetics impact would not be considered significant. 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, or other locally recognized desirable aesthetic natural feature 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 15 miles northeast of the Project Site,⁴ and the nearest City-designated scenic highway is along Sunset Boulevard, approximately 7 miles west of the Project Site.⁵ Therefore, the Project would not substantially damage scenic resources within a State or City-designated scenic highway. Moreover, pursuant to Senate Bill 743 and ZI No. 2452, the Project's aesthetics impact would not be considered significant. Therefore, no further evaluation of this topic in an EIR is required.

The Project's potential impacts to historical resources are discussed below in Checklist Question V, Cultural Resources.

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

Less Than Significant Impact. As previously discussed, under Senate Bill 743, the aesthetic impacts of the Project shall not be considered a significant impact on the environment. Nevertheless, for informational purposes, the EIR will discuss the Project's effects on visual character and visual quality of the site and its surroundings, including from shading and shadows.

California Scenic Highway Mapping System, Los Angeles County, www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, accessed November 27, 2017.

Mobility Plan 2035, Maps A3 and A4.

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

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, this considers the following factors: (1) the change in ambient illumination levels as a result of project sources; and (2) the extent to which project lighting would spill off the project site and affect adjacent light-sensitive areas. Regarding the first factor above, the Project Site currently generates moderate levels of artificial light and glare from low-level security lighting, and glass building surfaces. Although the Project would introduce new exterior lighting on the buildings and along pathways, the outdoor lighting would be low-level and not result in a substantive change in ambient illumination levels over existing conditions. In addition, outdoor lighting would be shielded such that the light source cannot be seen from adjacent residential properties to the south and east of the Project Site, or the public right-of-way, and would be dark-sky compliant.

While the new Project buildings would feature glass surfaces, the sawtooth windows and curtain walls would minimize the use of mirror coatings. There would be no other use of highly polished surfaces since the rest of the elevations of Buildings A, B, and C would feature black standing seam metal panels and exposed black steel beams and the proposed parking structure would feature polycarbonate panels and vertical black metal fins. In addition, only a part of the proposed new development would occur adjacent to streets. Specifically, only proposed Building A would front Sunset Boulevard, while the proposed parking structure at the corner of Fountain Avenue and Gordon Street would be feature an approximate 16-foot landscaped buffer along Gordon Street. Meanwhile, Buildings B, C, and the bike parking facility would be located entirely within the Project Site and away from any adjacent streets. Therefore, daytime glare would not interfere with the safe operation of motor vehicles on adjacent street. Moreover, pursuant to Senate Bill 743 and Zl No. 2452, the Project's aesthetic impacts would not be considered significant.

Less Than
Significant
Potentially with Less Than
Significant Mitigation Significant
Impact Incorporated Impact No Impact

- II. AGRICULTURE AND FORESTRY 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 Dept. 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 nonagricultural use?

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		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				\boxtimes
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?				

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 creative office, production support, sound stage, and service uses. The Project Site also includes three parking structures. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site and surrounding area are 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. 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 M1-1 (Limited Industrial Zone, Height District 1). The Project Site is not zoned for agricultural use. Furthermore, none of the surrounding properties are zoned for agricultural use. The Project Site and

⁶ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, http://zimas.lacity.org/, accessed December 12, 2017.

surrounding area are also not enrolled under a Williamson Act Contract.⁷ 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 one low-rise residential building. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned for industrial uses and is not zoned and/or used as forest land.⁸ 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?

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. 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.

City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, http://zimas.lacity.org/, accessed December 12, 2017.

⁸ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, http://zimas.lacity.org/, accessed December 12, 2017.

⁹ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, http://zimas.lacity.org/, accessed November 27, 2017.

	Less Than		
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Impact	Incorporated	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 of applicable air of	or obstruct implementation of toquality plan?	ne 🗵		
•	ir quality standard or contribute an existing or projected air qual			
increase of a project region applicable fect standard (incl	cumulatively considerable r ny criteria pollutant for which to n is non-attainment under a leral or state ambient air qual uding releasing emissions whi ntitative thresholds for ozo	ne an ity ch		
d. Expose sens	sitive receptors to substant entrations?	ial 🗵		
e. Create objection	nable odors affecting a substant ple?	ial 🗌		

Would the project:

a) Conflict with or obstruct implementation of the Air Quality Management Plan or Congestion Management Plan?

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (Air Basin). Within the Air 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 Air Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [PM_{2.5}], and lead¹⁰). 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). 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 whether the Project would conflict with or obstruct implementation of the AQMP.

Partial Nonattainment designation for lead for the Los Angeles County portion of the Air Basin only.

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, air quality standards could be violated and 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 Air 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 and 2.5 microns in size (PM_{10} and $PM_{2.5}$). Therefore, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Air Basin. 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 short- and long-term air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Sensitive receptors located in the vicinity of the Project Site include residential uses. Therefore, the Project could expose sensitive receptors to substantial pollutant concentrations and 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. 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 Rules 401, 402, and 403, regarding visible emissions violations.¹¹ In particular, SCAQMD Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.¹²

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.

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			Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV.	ВІ	IOLOGICAL 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 Game or U.S. Fish and Wildlife Service?				
	b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US 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?				

SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed December 12, 2017.

¹² SCAQMD, Rule 402, Nuisance.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	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?				

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 Game or U.S. Fish and Wildlife Service?

No Impact. The Project Site is located in an urbanized area and is currently occupied by creative offices, production support, and sound stages. Due to the urbanized and disturbed nature of the Project Site and the surrounding developed areas, as well as 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. In addition, as discussed in the attached Project Description, the Project Site contains limited to sparse landscaping in the form of non-native/non-protected trees, hedges, and shrubs that are dispersed across the Project Site. Thus, based on the lack of habitat on the Project Site, special status species listed by the California Department of Fish and Wildlife¹³ or by the U.S. Fish and Wildlife Service¹⁴ would not be anticipated to be present on-site. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City of Los Angeles.¹⁵ Therefore, the Project would not have any 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, and no mitigation measures are required. No further analysis 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, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, April 2017.

United States Fish and Wildlife Service, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, https://ecos.fws.gov/ecp0/reports/species-listed-by-state-report?state=CA&status=listed, accessed December 13, 2017.

¹⁵ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

No Impact. The Project Site is located in an urbanized area and is currently occupied by creative offices, production support, and sound stages. No riparian or other sensitive natural community exists on the Project Site. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles. In addition, there are no other sensitive natural communities identified by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service. 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 occupied by creative offices, production support, and sound stages. No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site. ²³ As such, the Project would not have an adverse effect on federally protected wetlands. No impact would occur, and no mitigation measures are required. Therefore, no further evaluation of this topic in an EIR is required.

d) 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 occupied by creative offices, production support, and sound stages. In addition, the areas surrounding the Project Site are fully developed, and there are no large expanses of open space areas within and surrounding the Project Site that provide linkages to natural open spaces areas and that may serve as wildlife corridors. Furthermore, the Project Site is not located in or

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City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/, accessed December 12, 2017.

U.S. Environmental Protection Agency, NEPAssist, www.epa.gov/nepa/nepassist, accessed December 12, 2017.

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

Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.

²⁰ California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), www.wildlife.ca.gov/Data/BIOS, accessed December 12, 2017.

California Department of Fish and Wildlife, CDFW Lands, https://www.wildlife.ca.gov/Lands, accessed December 12, 2017.

U.S. Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/index.html, accessed December 12, 2017.

²³ U.S. Environmental Protection Agency, NEPAssist, www.epa.gov/nepa/nepassist, accessed December 12, 2017.

adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles. ^{24,25}

Although unlikely, the on-site trees that would be removed during construction of the Project could potentially provide nesting sites for migratory birds. However, the Project would 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), to the extent feasible. Should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be affected. 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, impacts related to wildlife movement would be less than significant.

Based on the above, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Impacts would be less than significant, and no mitigation measures are required. Therefore, 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 (e.g., oak trees or California walnut woodlands)?

Less Than Significant Impact. The City of Los Angeles Protected Tree Ordinance (LAMC Chapter IV, Article 6) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least four 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 the City's Protected Tree Ordinance and are not considered protected. The City's Protected Tree Ordinance prohibits, without a permit, the removal of any regulated protected tree, including "acts which inflict damage upon root systems or other parts of the tree..." and requires that all regulated protected trees that are removed be replaced on at least a 2:1 basis with trees that are of a protected variety.

Based on the Tree Report included in Appendix IS-1 of this Initial Study, the Project would not involve the removal of any trees considered protected under the City of Los Angeles Native Tree Protection Ordinance either within the Project Site or in the adjacent right-of-way (street trees). To allow for development of the Project, 29 non-protected trees would be removed within the Project Site and two street trees would be removed in the adjacent right-of-way. Pursuant to the requirements of the City of Los Angeles Urban Forestry Division, the trees to be removed within the Project Site would

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

Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.

be replaced on a 1:1 basis and the street trees would be replaced on a 2:1 basis. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

f) 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 occupied by creative offices, production support, and sound stages. As described above, the Project Site does not support any habitat or natural community. No 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.

		Potentially Significant Impact	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?				

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines §15064.5?

City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/, accessed December 8, 2017.

United States Environmental Protection Agency, NEPAssist, www.epa.gov/nepa/nepassist, accessed November 27, 2017.

California Department of Fish and Wildlife, California Regional Conservation Plans, October 2017.

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

As previously discussed, within the Sunset Gower Studios, there are three buildings that could be eligible for historic status. These buildings include the building at 6050 Sunset Boulevard, the building at 1455 Gordon Street, and the building at 1440 Gower Street. As part of the Project, the building at 6050 Sunset Boulevard would be removed. The remaining two buildings would be retained. The Sunset Gower Studios has also been identified as a potential historic district based on SurveyLA's Historic Context Statement for motion picture studio properties developed by one of the major studios during the Studio Era as well as National Register and California Register criteria. Therefore, the EIR will provide further analysis of the Project's potential impacts on historical resources.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

Potentially Significant Impact. CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within an urbanized area of the City of Los Angeles and has been subject to grading and development in the past. Therefore, surficial archaeological resources that may have existed at one time have likely been previously disturbed. Nevertheless, it is estimated that approximately 211,000 cubic yards of export material 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 this era are extinct. Although the Project Site has been previously graded and developed, the Project would require additional grading and excavation 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 formal cemeteries?

Potentially Significant Impact. Although no human remains are known to have been found on the Project Site, there is the possibility that unknown resources could be encountered during Project construction, particularly during ground-disturbing activities, such as grading. Therefore, the EIR will provide further analysis of this topic.

		Data atially	Less Than Significant	l Th	
		Potentially Significant Impact	with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. GE	OLOGY AND SOILS. Would the project:				
a.	Expose people or structures to potential substantinjury, or death involving:	al adverse	effects, incl	uding the ri	sk of loss,
	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?				
_	Result in substantial soil erosion or the loss of topsoil?				

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
C.	Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, caused in whole or in 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 water?				

In 2015, the California Supreme Court in California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD), 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 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. 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.

The following analysis is based on the Soils and Geology Issues Report (Soils and Geology Report) prepared for the Project by Geotechnologies, Inc., dated December 1, 2017. All specific information on geologic and soils conditions in the discussion below is from this report unless otherwise noted. This report is included as Appendix IS-2 of this Initial Study.

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, 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 California Geological Survey 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 Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

Based on the Soils and Geology Report and a review of the City of Los Angeles General Plan Safety Element, the Project Site is not within an Alquist-Priolo Earthquake Fault Zone or within a City-designated Fault Rupture Study Area.²⁹ The closest active fault is the Hollywood Fault, which is located approximately 0.78 mile (1.26 kilometers) north of the Project Site.³⁰ Furthermore, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. The Grading Division of the Los Angeles Department of Building and Safety confirms that the Project Site is located outside of a State fault-rupture hazard zone.³¹ Therefore, since there are no known faults beneath the Project Site, the Project would not exacerbate existing environmental conditions such that people or structures would be exposed to rupture of a known earthquake fault. Furthermore, even though the Project would involve excavation for the underground parking levels, the proposed development would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions or stresses in the Earth's crust. Therefore, the Project would not result in the rupture of a known earthquake fault caused in whole or in part by the Project's exacerbation of the existing environmental conditions and impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

²⁹ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, http://zimas.lacity.org/, accessed December 12, 2017.

City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, http://zimas.lacity.org/, accessed December 12, 2017.

Email communication from Casey Lee Jensen, Engineering Geologist Associate III, Los Angeles Department of Building and Safety, Grading Division. Refer to Appendix IS-2 of this Initial Study.

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, which generally experiences moderate to strong ground shaking in the event of an earthquake. However, as previously stated in i) above, no active faults are known to pass directly beneath the Project Site and, therefore, the Project would not exacerbate existing environmental conditions (i.e., trigger an earthquake by disrupting a known earthquake fault) such that people or structures would be exposed to strong seismic ground shaking. In addition, the Project is located in a highly urbanized and fully developed area and these existing environmental conditions are not such that strong seismic ground shaking would be exacerbated by the Project. Furthermore, the Project would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions like strong seismic ground shaking. Based on the above, development of the Project would not result in strong seismic ground shaking caused in whole or in part by the Project's exacerbation of the existing environmental conditions. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Although the Project would not exacerbate existing environmental conditions such that people or structure would be exposed to strong seismic ground shaking, the following discussion about seismic building codes is provided for informational purposes only. 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. As with other development projects in the City of Los Angeles, the Project would comply with the Los Angeles Building Code, which incorporates current seismic design provisions of the 2016 California Building Code with City amendments. 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 lessen the effect of losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety is responsible for implementing the provisions of the Los Angeles Building Code. The Project would therefore be required to comply with the plan check review and permitting requirements of the Los Angeles Department of Building and Safety, including the incorporation of the recommendations provided in a final, site-specific geotechnical report. In addition, before permits can be issued for construction, the Project must demonstrate compliance with the applicable provisions of seismic safety plans and regulations, including, but not limited to, the Seismic Safety Act and Seismic Hazards Mapping Act.

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 seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: shallow groundwater; low density, fine, clean sandy soils; and strong ground motion. Neither the City of Los Angeles nor the State of California

classifies the Project Site as part of a potentially liquefiable area. 32,33 The Grading Division of the Los Angeles Department of Building and Safety confirms that the Project Site is located outside of a State liquefaction zone. In addition, the historically highest groundwater level at the Project Site ranges between 40 and 50 feet below ground surface. Thus, there is no shallow groundwater on the Project Site. The Soils and Geology Report explains that the soils underlying the Project Site consist of silty sands, sandy silts, clayey sands, and sands that are medium dense to very dense. Even though there are sandy soils at the Project Site, there is no shallow ground water and, as discussed above in Response to Checklist Question No. VI.a.ii, development of the Project would not exacerbate existing conditions that would cause people or structures to be exposed to strong seismic ground shaking. Thus, not all three conditions are met (i.e., shallow groundwater, sandy soils and strong ground motion) that could cause liquefaction. Therefore, based on these considerations, the Project would not exacerbate existing environmental conditions that could cause seismic-related ground failure, including liquefaction. As such, impacts 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 State³⁶ or the City of Los Angeles.^{37,38} The Grading Division of the Los Angeles Department of Building and Safety confirms that the Project Site is located outside of a State earthquake-induced landslide hazard zone.³⁹ Development of the Project would not substantially alter the existing topography of the Project Site. Specifically, the Project does not propose creating any steep slopes and the Project Site would remain flat. Therefore, the Project would not exacerbate existing conditions that would result in landslides. As such, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The Project Site is currently fully developed with buildings and surface parking areas. As such, there are no open spaces with exposed topsoil. However,

City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, http://zimas.lacity.org/, accessed December 12, 2017.

³³ State of California, California Geological Survey, Seismic Hazard Zones. Hollywood Quadrangle, March 25, 1999.

Email communication from Casey Lee Jensen, Engineering Geologist Associate III, Los Angeles Department of Building and Safety, Grading Division. Refer to Appendix IS-2 of this Initial Study.

³⁵ State of California, California Geological Survey, Seismic Hazard Zones. Hollywood Quadrangle, March 25, 1999.

³⁶ State of California, California Geological Survey, Seismic Hazard Zones. Los Angeles Quadrangle, March 25, 1999.

Los Angeles General Plan Safety Element, November 1996, Exhibit C, Landslide Inventory & Hillside Areas, p. 51.

³⁸ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, http://zimas.lacity.org/, accessed December 12, 2017.

Email communication from Casey Lee Jensen, Engineering Geologist Associate III, Los Angeles Department of Building and Safety, Grading Division. Refer to Appendix IS-2 of this Initial Study.

development of the Project would require grading, excavation, and other construction activities that have the potential to disturb existing soils underneath the Project Site and expose these soils to rainfall and wind during construction, thereby potentially resulting in soil erosion. But 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 Los Angeles Department of Building and Safety, which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavations, and fills. Furthermore, as discussed below in Response to Checklist Question IX.a., the Project would be required to comply with the City's Low Impact Development (LID) ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Regarding soil erosion during Project operations, the potential is negligible since the Project Site would mostly remain fully developed, except for a small landscape buffer to the south of the proposed parking structure at Gordon Street and Fountain Avenue. However, this buffer would be landscaped with trees to prevent soil erosion. 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. As discussed in the Soils and Geology Report, no large scale extraction of groundwater, gas, oil or geothermal energy is occurring or planned at the Project Site or in the general Project Site vicinity. Therefore, the Project Site is not located on a geologic unit or soil that is unstable nor would the Project cause a geologic unit or soil to become unstable. In addition, as discussed above, the Project Site is not located near slopes or geologic features that would result in on- or off-site landsliding or lateral spreading. The Grading Division of the Los Angeles Department of Building and Safety confirms that the Project Site does not require the removal of potential geologic hazards. As such, the Project would not exacerbate existing conditions such as unstable geologic units or unstable soil. In addition, as discussed in greater detail in Response to Checklist Question VI.a.iii above, based on the depth to groundwater, liquefaction is unlikely at the Project Site. In addition, there is no evidence of natural or manmade voids or low density soils (see Response iii above) that could lead to ground subsidence or collapse. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an 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?

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Email communication from Casey Lee Jensen, Engineering Geologist Associate III, Los Angeles Department of Building and Safety, Grading Division. Refer to Appendix IS-2 of this Initial Study.

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. Although there are clayey sands underneath the Project Site, according to the Soils and Geology Report (page 17), the soils are considered to have a very low to moderate expansion potential. In addition, the Project Site and immediate vicinity are fully developed, so no soil would be exposed to water and swell. Finally, the Project does not propose to expose the underlying soils permanently. Therefore, the Project would not exacerbate any existing environmental conditions that could create substantial risk to life or property due to expansive soil. In addition, through standard construction practices involving excavation activities and the associated removal of underlying soils as well as the subsequent use of engineered soils, any potential effects associated with expansive soils would be addressed. As such, the Project would not increase the expansion potential of underlying soils. Therefore, impacts would be less than significant. No mitigation measures and no further analysis of this topic in an EIR is required.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. Since the Project Site is located within a community served by existing wastewater infrastructure, 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.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				

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 (GHG) since they have effects that are analogous to the way in which a greenhouse retains heat. GHGs are emitted by both natural processes and human activities. The accumulation of GHGs in the atmosphere affects the earth's temperature. The State has undertaken initiatives designed to address the effects of GHG emissions and to establish targets and emission

reduction strategies for GHG emissions in California. Activities associated with the Project, including construction and operational activities, could result in GHG emissions that may have a significant impact on the environment. Therefore, the EIR will provide further analysis of the Project's GHG 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 GHGs, 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 GHGs.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII.	HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
а	. 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 from the project's exacerbation of 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 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 result in a safety hazard for people residing or working in the project area?				

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 from the project's exacerbation of existing environmental conditions?				

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In 2015, the California Supreme Court in CBIA v. BAAQMD, 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 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. 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 hazards and hazardous materials if it would result in any of the following impacts.

The following analysis is based, in part, on the *Phase I Environmental Site Assessment Report* (Phase I ESA) prepared for the Project by Citadel Environmental Services, Inc., dated November 27, 2017. All specific information on historic and existing on-site conditions in the discussion below is based on the Phase I ESA unless otherwise noted. The Phase I ESA is included as Appendix IS-3 of this Initial Study.

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 commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Studio uses, in particular, would involve the use of hazardous materials such as paints, adhesives, aerosol spray paint, and film/photo developer solutions during movie and television

production, set making, and general maintenance/cleaning. All potentially hazardous materials to be used during construction and operation of the Project would be contained, stored, used and disposed of in accordance with manufacturers' instructions and handled in accordance with all applicable standards and regulations, including, but not limited to, those set forth by the federal and State Occupational Safety and Health Acts (i.e., the Federal Resource Conservation and Recovery Act and California Hazardous Waste Control Law). Such requirements include obtaining material safety data sheets from chemical manufacturers, making these data sheets available to employees, labeling chemical containers in the workplace, developing and maintaining a written hazard communication program, and developing and implementing programs to train employees about hazardous materials. Finally, the Project would not involve the routine transport of hazardous materials. 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 ESA included a review of environmental records for the Project Site and a site reconnaissance to identify potential on-site hazards. According to available historical sources, the Project Site was developed with two small structures, likely residences, as early as 1894. By 1919, a film laboratory, a studio with an office, an open stage, and dressing rooms appeared in the north portion of the Project Site, along Sunset Boulevard. An oil and gasoline station also appeared in the northwest corner of the Project Site. Based on reviewed building permits and aerial photographs, the gasoline station was developed in 1919 and removed by 1928. By 1928, the Project Site appeared densely developed with commercial structures and residences. By 1950, the Project Site appeared developed with auto repair shops with pumps for two gasoline tanks in the southwest portion of the Project Site. Stages and buildings were developed through 1970, and several parking structures were built between 1979 and 2016.

Based on the previous uses of the Project Site, the Phase I ESA identified recognized environmental conditions (RECs)⁴¹ associated with the gasoline station previously located in the northwest corner of the Project Site, machine shop and paint spray booth located in the northeastern portion of the Project Site, auto repair are and gasoline pumps, and auto repair and oil storage area.

As part of the Phase I ESA, a geophysical survey was completed at each of the proposed areas of exploration to evaluate the possible presence of buried utilities and possible abandoned in-place underground storage tanks (USTs) associated with the former gasoline station and gasoline pumps, and oil storage tanks associated with the auto repair areas. No large metallic objects, which would be indicative of buried USTs or septic tanks, were detected in any of the areas surveyed. In addition, a total of 15 soil borings were completed at the Project Site and three soil samples were retained from each boring for laboratory analytical analysis. Soil samples collected from the former

A recognized environmental condition, or REC, means the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat to a future release to the environment.

gasoline station area were analyzed for total petroleum hydrocarbon (TPH) in the gasoline range. Soil samples collected in the northeast portion of the Project Site were analyzed for volatile organic compounds (VOCs), TPH, and metals. One sample was also analyzed for chromium VI (hexavalent chrome). Soil samples collected from the former auto repair areas were analyzed for TPH and benzene, toluene, ethylbenzene, and xylenes (BTEX). TPH, BTEX, and VOCs were not detected in Arsenic was detected in three of the soil samples, exceeding EPA any of the soil samples. Preliminary Remediation Goals of 0.39 milligram per kilogram (mg/kg) for residential soil. However, these detections were below the average concentration range of arsenic in California (0.59 to 11 mg/kg). The metal concentrations in the samples analyzed did not exceed the Total Threshold Limit Concentration, and would not be classified as a California hazardous waste. Based on these findings, the identified RECs would be considered historical recognized environmental conditions (HRECs). An historical recognized environmental condition, or HREC, is a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).

A Phase I ESA was previously prepared for the building at 6060 Sunset Boulevard. According to the Phase I ESA prepared for that building, the property was occupied as a film developing studio from 1918 until 2005. Various chemicals, including solvents, were used and stored during that time. A subsurface soil and soil vapor assessment conducted in 2006 showed elevated levels of VOCs in soils at the property. Soil vapor extraction was conducted for a year in 2008; however, VOCs remained above human health screening levels in one area. Therefore, an Indoor Air Quality assessment for VOCs was conducted in 2009. While select VOCs were detected, the total VOC concentrations were below Permissible Exposure Limits established by Cal-OSHA and the recommended American Conference of Governmental Industrial Hygienists Threshold Limit Values.

With regard to the existing uses on the Project Site, potential environmental concerns identified during site reconnaissance in the Phase I ESA included one aboveground storage tank (AST) used for diesel storage to support the emergency generator; various identified hazardous materials typical of the existing on-site uses, including spray paints/enamels, paint thinners, oils, acetylene and oxygen cylinders, plasters, sealers, cooling water treatment chemicals, propane tanks, and diesel for gardening tools; polychlorinated biphenyls (PCBs) associated with the on-site pad-mounted transformers and transformer stations, a hydraulic lift/dock with a five-gallon reservoir, and on-site elevators; radioactive man-made materials associated with the on-site self-luminescent tritium exit signs typical of many public and private office buildings in the United States; wells, cisterns, sumps, and drains; and wastewater or grease interceptors. No spills, staining, or leaks were observed by the AST. Routine janitorial and maintenance supplies were stored properly with no signs of staining or leaking. Minor staining was observed around the five-gallon reservoir associated with the hydraulic lift/dock and at one of the elevator rooms; however, as determined in the Phase I, such staining is not expected to represent a significant environmental concern. The radioactive materials associated with the exit signs were also found to not constitute a recognized environmental condition.

Similarly, the presence of wells, cisterns, sumps, drains, and wastewater and grease interceptors were not found to represent a significant environmental concern.⁴²

Based on the age of the buildings on-site, there are presumed to be asbestos-containing materials (ACMs) and lead-based paints (LBPs) at the Project Site. However, in the event any suspect ACMs or LBPs is found during demolition activities, the Project would adhere to all federal, State, and local regulations prior to their disturbance and removal. These regulations include, but are not limited to, the Toxic Substances Control Act, the Resource Conservation and Recovery Act, the federal and State Occupational Safety and Health Acts, SCAQMD Rule 1403 pertaining to asbestos emissions from renovation/demolition activities, and the Residential Lead-Based Paint Reduction Act. Mandatory compliance with applicable federal and State standards and procedures would reduce risks associated with ACMs and LBP to less-than-significant levels.

The Phase I ESA identified PCBs associated with the on-site pad-mounted transformers and transformer stations, a hydraulic lift/dock with a 5-gallon reservoir, and on-site elevators. In the event that PCBs are encountered during Project construction, 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 Code of Federal Regulations 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.

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. The Division of Oil, Gas & Geothermal Resources Online Mapping System shows that there is an oil well approximately 960 feet west of the Project Site that was operated by Chevron USA Inc. The oil well was drilled to a depth of 4,724 feet in May 1969, but never produced oil and was abandoned by August 1969. The Division of Oil, Gas & Geothermal Resources Online Mapping System lists the status for the oil well as inactive and plugged. Therefore, there is a negligible risk of subsurface methane release.

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?

Citadel Environmental Services, Inc., Phase I Environmental Site Assessment Report, November 27, 2017. See Appendix IS-3, of this Initial Study.

City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/, accessed March 20, 2017.

Less Than Significant Impact. Joseph Le Conte Middle School is located approximately 0.25 mile east of the Project Site at 1316 North Bronson Avenue. 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 commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed uses would be typical of office and studio 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 within and 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. Specifically, the Project does not involve the development of industrial or other uses that would emit large amounts of chemicals or acutely hazardous materials. Furthermore, all materials used 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 to and from the Hollywood Freeway and trucks would not travel adjacent to the school. As such, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. 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 it create a significant hazard to the public or the environment, caused in whole or in part from the project's exacerbation of existing environmental conditions?

Less Than Significant Impact. California Government Code Section 65962.5 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 California Government Code 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 California 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 ESA 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 database, Geotracker, ZIMAS, and the Division of Oil, Gas, and Geothermal Resources.

A review of available federal, State, and local databases found that the Project Site was located on hazardous materials lists, due to the use of materials specifically related to studio productions and sets. Namely, the Project Site was listed on the Resource Conservation and Recovery Act (RCRA) Small Quantity Generators list in 2007. The RCRA regulations establish basic hazardous waste management standards found in title 40 of the Code of Federal Regulations for

hazardous waste generators. In the case of the Project Site, the listing was for the generation of ignitable waste and spent halogenated and non-halogenated solvents. Solvents can be used as cleaning agents or in paint thinning and coating, etc. and may be hazardous wastes when can no However, the RCRA generator regulations ensure that hazardous waste is appropriately identified and handled safely to protect human health and the environment. With compliance with these regulations, no violations were reported associated with this listing. The Project Site was also listed on the RCRA Non Generators list associated with NBC Universal TV's generation of ignitable waste, barium, cadmium, chromium, lead, methyl ethyl ketone, and spent nonhalogenated solvents in 2006. With compliance with the RCRA generator regulations, no violations were reported associated with this listing. In addition, the Project Site was listed on the DTSC Hazardous Waste Information System (HAZNET) database as a generator of hazardous wastes including solvents, latex waste, paint sludge, aqueous solutions, and other organic solids. These materials are all typical of studio productions and sets and no violations associated with this listing were reported. The Project Site was also identified on the HAZNET database for generating oil/water separation sludge in 2006 and asbestos containing waste in 2006, 2014, and 2015. Project Site is included on the aforementioned lists, these listings are due to the use of specific hazardous materials that are typical of studio productions and sets. The Phase I ESA concluded that there are no reported violations from the identified hazardous materials.

Based on the above, the Project could not exacerbate any existing environmental conditions that could otherwise create a significant hazard to the public or the environment associated with the Project Site being located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. 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 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. Therefore, no impact would occur, and no mitigation measures are required. 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, or disaster 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. 44 The closest disaster routes include the Hollywood Freeway, located approximately 0.5 mile east of the Project Site, and Santa Monica Boulevard, located approximately 0.4 mile south of the Project Site. The majority of construction activities for the Project would be confined to the Project Site with limited off-site construction activities occurring in adjacent street rights-of-way (e.g., Sunset Boulevard, Gordon Street, Gower Street) during certain periods of the day. As such, Project-related construction activities would not occur within or adjacent to the City-designated disaster routes stated above (i.e., the Hollywood Freeway and Santa Monica Boulevard). With regard to operation, the Project does not propose the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from Sunset Boulevard. In addition, the Project would not install barriers that would impede access in the vicinity of the Project Site. Therefore, construction and operation of the Project would not have the potential to interfere with access to and along the aforementioned City-designated disaster routes. Accordingly, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan. Impacts would be less than significant, and no mitigation measures are required. No further evaluation 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?

No 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 Zone⁴⁵ or within a City-designated fire buffer zone.⁴⁶ Therefore, the Project would not exacerbate existing conditions (i.e., here are no wildlands adjacent to the Project Site) that would subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/, accessed November 27, 2017. 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.

⁴⁶ City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.

			Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX.		YDROLOGY AND WATER QUALITY. Would the oject:				
	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 preexisting 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?			\boxtimes	
	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?				

The following analysis is based, in part, on the *Technical Report: Water Resources* (Water Resources Technical Report) prepared for the Project by KPFF Consulting Engineers, dated February 26, 2018. The Water Resources Technical Report is included as Appendix IS-4 of this Initial Study.

Would the project:

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

Less Than Significant Impact. During Project construction, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. However, as Project construction would disturb more than one acre of soil, the Project would be required to implement a Stormwater Pollution Prevention Plan (SWPPP) 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). The SWPPP would set forth Best Management Practices (BMPs) for stormwater and non-stormwater discharges, 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 during construction. 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. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion.

Based on the depth to groundwater identified by the geotechnical investigation (48 feet below ground surface), the Project's maximum proposed excavation of up to 42 feet below ground surface is not anticipated to disturb the groundwater table during construction. Even 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. Prior to the issuance of a grading permit, the Project 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 NPDES Construction General Permit. With compliance with these existing regulatory requirements, impacts to water quality and waste discharge requirements during construction would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

Operation of the Project would introduce sources of potential water pollution that are typical of commercial developments, including studio uses (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with circulation areas). Stormwater runoff from precipitation events could also potentially carry urban pollutants into municipal storm drains. However, in accordance with the City's Low Impact Development (LID) Ordinance (Ordinance No. 181899), best management practices (BMPs) would be implemented on-site to address City and State water quality

requirements. The Project would not violate any water quality standards or waste discharge requirements through compliance with these regulatory requirements for stormwater and non-stormwater discharges; i.e.,implementation of LID standards and best management practices. Therefore, impacts to surface water quality would be less than significant. No mitigation measures are required, 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 48 feet below ground surface. However, the Project would only require excavation to maximum depths of 42 feet for construction of the subterranean parking levels. In addition, dewatering during construction or operation is not anticipated. As such, the Project would not substantially deplete groundwater supplies.

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. According to the Water Resources Technical Report, the Project Site is almost entirely impervious (99 percent impervious surfaces) 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 99 percent of the Project Site, as with existing conditions. As such, operation of the Project would not alter the existing limited groundwater recharge that occurs within the Project Site. Therefore, the Project would not interfere substantially 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 level. Therefore, impacts on groundwater would be less than significant, and no mitigation measures are 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 primarily drains to Fountain Avenue. Areas that drain to Gordon Street and Gower Street flow along gutters to catch basins at Fountain Avenue.

Construction activities associated with the Project, which would involve removal of some of the existing structures and grading, have the potential to temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site

temporarily more permeable. However, as discussed above in Response to Checklist Question IX.a. the Project would be required to obtain coverage under the NPDES Construction General Permit. The SWPPP prepared pursuant to this permit requires 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 permit regulations, erosion control plans, LID, and inspections to reduce sedimentation and erosion.

As discussed in the Water Resources Report, the Project Site is 99 percent impervious under existing conditions. At buildout of the Project, the Project Site would be comprised of approximately 99 percent impervious areas. As such, similar to existing conditions, there would be a limited potential for erosion or siltation to occur from exposed soils or large expanses of pervious areas. In addition, as determined in the Water Resources Report, the overall flow rate would be reduced compared to existing conditions. With implementation of the Project, stormwater would flow to discharge points at the curb face and then discharge the stormwater to the public storm drain system, which would be an improvement over existing conditions wherein some of the on-site stormwater sheet flows directly into the street curb.

Based on the above, 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. There are no streams or rivers within the Project Site. In addition, As described above in Response to Checklist Question IX.c, the Project would not substantially alter drainage patterns. As discussed in the Water Resources Report, existing runoff flows during a 50-year storm event⁴⁷ are 44.27 cubic feet per second. At buildout of the Project, the Project Site would be comprised of approximately 99 percent impervious areas, like existing conditions. Accordingly, there would be no incremental increase in the imperviousness of the Project Site that would substantially increase runoff volumes into the existing storm drain system. Moreover the Water Resources Report determines that post-development runoff flows would decrease from 44.27 cubic feet per second to 43.75 cubic feet per second during a 50-year storm event. Therefore, stormwater flows from the Project Site would not substantially increase with = the Project. Thus, the Project would not substantially increase the rate or amount of surface runoff in a manner which would

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.

result in flooding on-site or off-site. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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. As discussed in Response to Checklist Question IX.c, above, the Project would maintain the existing percentage of impervious surfaces within the Project Site and would therefore not create new potential for runoff water to exceed the capacity of existing stormwater drainage systems. In addition, as discussed in Response to Checklist Question IV.d, post-development runoff flows would actually decrease from 44.27 cubic feet per second to 43.75 cubic feet per second during a 50-year storm event. Therefore, stormwater flows from the Project Site would not increase with due to the Project. In terms of polluted runoff, the Project's proposed uses would be typical of studio-related operations and would not introduce substantial sources of polluted water that an industrial operation would introduce, for example. Moreover, even if there were polluted runoff generated by the studio uses, the Project would be required to comply with the City's LID requirements, which would address these potential discharges. As such, the Project would not create or contribute additional runoff water that would exceed the capacity of the existing stormwater system or provide substantial sources of polluted runoff. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

f) Otherwise substantially degrade water quality?

Less Than Significant Impact. As discussed above in Response to Checklist Question IX.a, the Project would implement BMPs to filter, treat, and reduce stormwater pollutants prior to discharge from the Project Site, in accordance with the City's LID requirements and SWPPP (see Checklist Question IX.a). Non-stormwater runoff associated with typical operations of the Project Site would also be filtered to some extent by the BMPs (e.g., through the use of biofiltration) provided on-site prior to discharging from the Project Site. Therefore, the Project would not substantially degrade water quality. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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 does not include housing and 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. Thus, the Project would not place housing within a 100-year flood hazard area. No impacts would occur, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Federal Emergency Management Agency, Flood Insurance Rate Map, Panel Number 06037C1075F, effective September 26, 2008.

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

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

No Impact. As discussed above in Response to Checklist Question IX.g, the Project Site is not located within a designated 100-year flood hazard area. Thus, the Project would not place structures that would impede or redirect flood flows within a 100-year flood hazard area. No impacts would occur, and no mitigation measures are 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 Project would not increase runoff flows such that flooding could occur. Moreover, 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.⁵⁰ The Project Site is located within the potential inundation area for the Hollywood Reservoir, which is held by the Mulholland Dam.⁵¹ The Mulholland Dam is a Los Angeles Department of Water and Power (LADWP) dam located in the Hollywood Hills approximately 1.5 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 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 flooding 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 11.6 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.⁵² Given the Project Site's location approximately

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

⁵¹ City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit G, November 26, 1996, p. 59.

⁵² City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit G, November 26, 1996, p. 59.

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.

			Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X.	L	AND 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?				

Would the project:

a) Physically divide an established community?

Less Than Significant Impact. As discussed in Attachment A, Project Description, of this Initial Study, the Project Site is located in a highly urbanized area characterized by a mixture of historic and modern low- to high-rise buildings occupied by neighborhood-serving commercial/retail uses, tourist and entertainment-related commercial/retail uses, offices, hotels, educational institutions, and single-family and multi-family residences. The Project proposes the preservation and enhancement of portions of the existing Sunset Gower Studios including the development of new studio-related creative office, production office/production support and storage uses, and parking facilities. All proposed development would occur within the boundaries of the Sunset Gower Studios, which is fully developed, and the Project does not propose a freeway or other large infrastructure or barrier that would divide a community. Therefore, the Project would not physically divide, disrupt, or isolate an established community. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in the 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. The EIR will provide further analysis of whether the Project conflicts with applicable land use plans, policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect.

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

No Impact. The Project Site is located in an urbanized and fully developed area and is currently occupied by creative offices, production support, and sound stages. As discussed above in Checklist Question IV, Biological Resources, the Project Site does not support any habitat or natural community. No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.^{53,54} 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.

	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?				

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. The Project Site is located within an urbanized area and has been previously disturbed by development. 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. 55,56 The Project Site is also not located within a City-designated oil

City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/, accessed November 27, 2017.

⁵⁴ California Department of Fish and Wildlife, California Regional Conservation Plans, July 2017.

⁵⁵ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

field or oil drilling area.⁵⁷ 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. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.^{58,59,60} The Project Site is also not located within a City-designated oil field or oil drilling area.^{61, 62} 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.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. NOISE. Would the proje	ect result in:				
levels in excess of s	s to or generation of noise standards established in the or noise ordinance, or of other agencies?				
• •	to or generation of excessive on or groundborne noise				
•	anent increase in ambient project vicinity above levels roject?				
•	rary or periodic increase in in the project vicinity above the project?				

State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.

⁵⁷ City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit E, November 26, 1996, p. 55.

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

⁵⁹ State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.

⁶⁰ City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.

⁶¹ City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit E, p. 55.

California Division of Oil, Gas and Geothermal Resources, 2017, Online Well Finder, http://maps.conservation.ca.gov/doggr/#close, accessed November 27, 2017.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				

Would the project:

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. 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 additional studio-related uses to the Project Site, noise levels from on-site sources may also increase during operation of the Project. 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.

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

Potentially Significant Impact. As discussed in Response to Checklist Question XII.a, above, human activity associated with the Project would have the potential to permanently 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 located 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.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. PO	OPULATION 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?				
Would	I 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 new creative office, production support, and sound stage uses. Since the Project does not propose a housing component, it would not directly induce a new residential population which would contribute to population growth in the vicinity of the Project Site or Hollywood Community Plan area.

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

With regards to operation, the Project Site is located within the highly urbanized Hollywood Community Plan Area, which is already fully developed with homes and businesses. The Project would not introduce new homes or businesses since the Project calls for the continuation of the commercial uses at the existing Sunset Gower Studios. Even if the new employment opportunities generated by the proposed creative office, production support, and sound stage uses, which is estimated to be approximately 2,500 employees, could induce population growth, the increase in population would not be substantial since not all employees would necessarily move close to the Project Site. Some employment opportunities may be filled by people already residing in the vicinity of the Project Site, and other persons would commute to the Project Site from other communities in and outside of the City. Therefore, given that the Project would not directly contribute to substantial population growth in the Project area through the development of residential uses and as some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site or who would commute, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. As such, the Project would not result in substantial population growth by proposing new homes and businesses. Further, as the Project would be located in a highly developed area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth.

Based on the above, the Project would not induce substantial population or housing growth. Impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b) 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 rassociated with the provision of new or physically abhysically altered governmental facilities, the coenvironmental impacts, in order to maintain acceptoerformance objectives for any of the public services:	esult in substa altered governn onstruction of	nental facilit which coul	ies, need f ld cause	for new or significant
a. Fire protection?				
b. Police protection?	\boxtimes			
c. Schools?			\boxtimes	
d. Parks?				
e. Other public facilities?			\boxtimes	

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?

Potentially Significant Impact. The LAFD provides fire protection and emergency medical services for the Project Site. The Project would increase the building square footage on-site, which has the potential to result in an increased demand for fire protection services and associated facilities, the construction of which might result in adverse physical impacts. 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 increase the building square footage on-site and increase the daytime population in the service area. This could result in the need for additional

police services and associated facilities, the construction of which might result in adverse physical impacts. Therefore, the EIR will provide further analysis of this issue.

c) Schools?

Less Than Significant Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). LAUSD is divided into six local districts. The Project Site is located in Local District–West. As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of students within the service area of LAUSD from the introduction of a residential population. In addition, not all new employees of the Project would necessarily relocate to the vicinity of the Project Site, which could otherwise trigger a demand for new or expanded school facilities. Furthermore, even if there were new school facilities that would need to be built, pursuant to Senate Bill 50, the Project Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Therefore, impacts would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

d) Parks?

Less Than Significant Impact. Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. Nearby parks and recreational facilities within an approximate 2-mile radius of the Project Site include: Carlton Way Park (located 0.4 mile northeast of the Project Site); Seily Rodriguez Park (located 0.8 mile southeast of the Project Site); Hollywood Pool and Recreation Center (located 0.8 southwest of the Project Site); Selma Park (located 0.8 mile west of the Project Site); De Longpre Park (located 1.0 mile west of the Project Site); Yucca Community Park (located 1.1 mile northwest of the Project Site); La Mirada Park (located 1.2 miles southeast of the Project Site); Las Palmas Senior Center (located 1.3 miles northwest of the Project Site); Dorothy & Benjamin Smith Park (located 1.7 miles northwest of the Project Site); Lemon Grove Recreation Center (located 1.8 miles southeast of the Project Site); Robert L. Burns Park (located 1.9 miles south of the Project Site); Barnsdall Art Park (located 1.9 miles east of the Project Site); and Runyon Canyon Park (located 2.0 miles northwest of the Project Site).

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create a demand for parks. While it is possible

⁶³ Los Angeles Unified School District, Board of Education Districts Maps 2015-2016, http://achieve.lausd.net/Page/8652, accessed December 11, 2017.

⁶⁴ Los Angeles Unified School District, Board of Education Local District—West Map, July 2015.

that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks. In addition, Project employees would be more likely to use parks near their homes during non-work hours. Furthermore, the Project proposes on-site open space amenities such as landscaped courtyards with seating for use by employees, reducing the likelihood they would use local parks. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks or the need for new or physically altered parks. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

e) Other public facilities?

Less Than Significant Impact. Other public facilities available include libraries. The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles through its Central Library, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through Web-based resources. The Project area is served by existing libraries within the Hollywood Community Plan area, including the Frances Howard Goldwyn Hollywood Regional Library, located 0.6 mile northwest of the Project Site.

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				
Los Angeles Public Library, Library Directory.				

Loop Thon

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

a) Would the project Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

Less Than Significant Impact. As described above in Response to Checklist Question XIV.d, many public parks and recreational facilities are located in the vicinity of the Project Site. There is one regional park, Runyon Canyon Park, located in the vicinity of the Project Site, approximately 2 miles northwest of the Project Site. As previously discussed, the Project does not propose the development of residential uses which would create a demand on nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create a demand for parks and recreational facilities. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks and recreational facilities. In addition, Project employees would be more likely to use parks near their homes during non-work hours.

Based on the above, the Project would not substantially increase the demand for off-site public parks and recreational facilities, such that substantial physical deterioration of those facilities would occur or be accelerated. The impact on parks and recreational facilities would be less than significant and mitigation measures would not be required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project would not include the development of recreational facilities or require the expansion of recreational facilities, as discussed above in Response to Checklist Question XIV.d. Therefore, no impact would occur and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

V\/I TI	RANSPORTATION/TRAFFIC. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking	\boxtimes			
	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?	\boxtimes			
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?				

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 that 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 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?

Less Than Significant Impact. The Project proposes a new 300-foot-tall, 18-story building and two mid-rise buildings with maximum heights of 89 feet each. However, the Project Site is not located within the vicinity of any private or public airport or planning boundary of any airport land use plan. Additionally, the Project does not propose any uses that would increase the frequency of air traffic. Furthermore, the Project would be required to comply with the notice requirements imposed by the FAA for all new buildings taller than 200 feet and would complete Form 7460-1 (Notice of Proposed Construction or Alteration). Therefore, the Project would not result in a change in air traffic patterns that could result in substantial safety risks. Impacts would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the 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 design features (e.g., sharp curves or dangerous intersections). The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections, and the development of the Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. In addition, the proposed uses would be consistent with the surrounding uses (i.e., commercial) and would not introduce hazards due to incompatible uses such as farm equipment. Therefore, no impact would occur and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

e) Result in inadequate emergency access?

Potentially Significant Impact. Project construction would be primarily confined on-site; however, Project construction activities may cause the potential closure of travel lanes in adjacent off-site streets for the installation or upgrading of local infrastructure. Construction within these roadways has the potential to impede access to adjoining uses, as well as reduce the rate of flow of the affected roadway. The Project would also generate construction traffic, particularly haul trucks, which may affect the capacity of adjacent streets and highways, which may affect emergency access. Therefore, further analysis 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.

Less Than

		Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII.	TRIBAL CULTURAL RESOURCES.				
a.	Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
	 Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or 				
	ii. 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.				

Would the project:

- a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?
- b) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Potentially Significant Impact. Approved by Governor Jerry Brown on September 25, 2014, Assembly Bill 52 establishes a formal consultation process for California Native American Tribes to identify potential 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 Assembly Bill 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 additional excavations within the Project Site. 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 Assembly Bill 52, the City will notify all applicable tribes and the Project will participate in any requested consultations. Further analysis of this topic will be provided in the EIR.

	Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. UTILITIES AND SERVICE SYSTEMS. Would the project:				
 Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? 				

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				
g.	Comply with federal, state, and local statutes and regulations related to solid waste?				

Would the project:

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

Less Than 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. Incoming wastewater to the treatment plant initially passes through screens and basins to remove coarse debris and grit. This is followed by primary treatment, which is a physical separation process where heavy solids settle to the bottom of tanks while oil and grease float to the top. These solids, called sludge, are collected, treated, and recycled. The portion of water that remains, called primary effluent, is treated through secondary treatment using a natural, biological approach. Living micro-organisms are added to the primary effluent to consume organic pollutants. These micro-organisms are later harvested and removed as sludge. Treated water from the Hyperion

LASAN, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf. ctrl-state=grj40dmqj 1780& afrLoop=3950078628628745#!, accessed January 30, 2018.

Water Reclamation Plant is discharged through an outfall pipe 5 miles into the Santa Monica Bay and Pacific Ocean.⁶⁷ The discharge from the Hyperion Water Reclamation Plant into Santa Monica Bay is regulated by the Hyperion Water Reclamation Plant's National Pollutant Discharge Elimination System Permit issued under the Clean Water Act and is required to meet the Regional Water Quality Control Board's requirements for a recreational beneficial use.⁶⁸ Accordingly, the Hyperion Water Reclamation Plant's effluent that is released to Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed water quality standards. The City's Environmental Monitoring Division also monitors flows into the Santa Monica Bay.⁶⁹

The wastewater generated by the Project would be typical of office and studio uses. No industrial discharge into the wastewater system would occur as part of the Project as no such uses are proposed. As the Hyperion Water Reclamation Plant is in compliance with the State's wastewater treatment requirements, the Project would not exceed the wastewater treatment requirements of the Regional Water Quality Control Board. 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) 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?

Less Than Significant Impact. Despite the Project's increase in the amount of developed floor area on the Project Site, as determined in Checklist Question XVIII.a, the Project would not cause an exceedance of wastewater treatment requirements at the Hyperion Water Reclamation Plant. Therefore, the Project would not cause there to be the need for the construction of new water or wastewater treatment facilities or the expansion of such facilities. As such, there would be no significant environmental effects from the potential construction of such facilities. Even if there were the need for construction of new water or wastewater treatment facilities or expansion of existing facilities, environmental review would be completed to analyze whether the construction of these facilities would cause significant environmental effects. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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?

Less Than Significant Impact. As discussed in Response to Checklist Question IX.c, above, the Project would maintain the existing percentage of impervious surfaces within the Project Site. In addition, as discussed in Response to Checklist Question IV.d, post-development runoff flows would

⁶⁷ California Regional Water Quality Control Board, Los Angeles Region, Order No. R4-2010-0200, NPDES No. CA0109991, Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for the City of Los Angeles, Hyperion Treatment Plant Discharge to the Pacific Ocean.

California Regional Water Quality Control Board, Los Angeles Region, Order No. R4-2010-0200, NPDES No. CA0109991, Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for the City of Los Angeles, Hyperion Treatment Plant Discharge to the Pacific Ocean.

LASAN, Environmental Monitoring, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-wp-ec-em?_adf.ctrl-state=xsmd2kgwx 131& afrLoop=21105064772207683#!, accessed January 30, 2018.

decrease from 44.27 cubic feet per second to 43.75 cubic feet per second during a 50-year storm event. Therefore, stormwater flows from the Project Site would not increase with implementation of the Project. Thus, the existing public stormwater system would have sufficient capacity to accommodate the Project and the Project would not require or result in the construction of new stormwater drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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. Given the Project's increase in the amount of developed floor area and associated wastewater generation, further analysis of the ability of the existing infrastructure to serve the Project will be provided in an EIR.

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 inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in inert waste landfills. Ten (10) Class III landfills and one inert waste landfill with solid waste facility permits are currently operating within the County. 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.

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

County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017. The 10 Class III landfills within the County include the Antelope Valley Landfill, the Burbank Landfill, the Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, San Clemente Landfill, Savage Canyon Landfill, the Scholl Canyon Landfill, and the Sunshine Canyon City and County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

In 2016, the City of Los Angeles disposed of approximately 2.71 million tons of solid waste at the County's Class III landfills and approximately 44,942 tons at transformation facilities.^{72,73} The 2.71 million tons of solid waste accounts for approximately 3.17 percent of the total remaining capacity (85.45 million tons) for the County's Class III landfills open to the City as of December 31, 2016.^{74,75}

The permitted inert waste landfill serving the County is Azusa Land Reclamation. This facility currently has 56.34 million tons of remaining capacity and an average daily in-County disposal rate of 897 tons per day. 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. Based on the most recent 2016 ColWMP Annual Report, the remaining total disposal capacity for the County's Class III landfills is estimated at 103.18 million tons.

Based on the 2016 ColWMP Annual Report, the countywide cumulative need for Class III landfill disposal capacity through the year 2031 will exceed the 2016 remaining permitted Class III landfill capacity of 103 million tons. Therefore, the Annual Report evaluated seven scenarios to increase capacity 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 seven 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, study, promote, and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail. 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.⁷⁷ The City of Los Angeles is currently diverting 76 percent of its waste from landfills.⁷⁸ The City has adopted the goal of achieving 90 percent diversion by 2025, and zero waste by 2030.

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.

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).

 $^{^{74}}$ (2.71 million tons ÷ 85.45 million tons) X 100 = 3.17 percent.

County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017, Appendix E-2 Table 1.

County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2016 Annual Report, September 2017.

⁷⁷ City of Los Angeles, Solid Waste Integrated Resource Plan FAQ.

LA Sanitation, Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=alxbkb91s 4& afrLoop=18850686489149411#!, accessed December 12, 2017.

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

Construction

The Project Site is currently developed with 550,300 square feet of floor area, including approximately 319,300 square feet of creative office uses, 56,000 square feet of production support uses, and approximately 175,000 square feet of floor area associated with sound stages. To provide for the proposed improvements, the Project would remove approximately 160,500 square feet of existing floor area, consisting of 125,500 square feet of creative office, 29,400 square feet of production support, and 5,600 square feet of sound stage uses. The 1,400 square feet of existing service uses would also be removed. Overall, the Project proposes the construction of 628,000 square feet of floor area, resulting in a net increase of approximately 467,500 square feet of floor area upon buildout.

Pursuant to the requirements of Senate Bill 1374,79 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 inert waste 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-55, after accounting for mandatory recycling, the Project would result in approximately 3,414 tons of construction and demolition waste. This would represent approximately 0.006 percent of the remaining permitted capacity at the Azusa Land Reclamation facility and approximately 0.004 percent of the remaining permitted capacity at Class III landfills open to the City. Given the remaining permitted capacity of the Azusa Land Reclamation facility, which is approximately 56.34 million tons, as well as the remaining 85.45 million tons of capacity at the 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 on page B-56, the Project's net increase in solid waste generation would be approximately 1,715 tons of solid waste per year. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as compliance with AB 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's 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

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

Table B-1
Project Demolition and Construction Waste Generation

Building	Size	Generation Rate (lbs/sf) ^{a,b}	Total (tons) ^b
Construction Waste	•		
Creative Office	599,350 sf	3.89	1,166
Production Support	27,200 sf	3.89	53
Total Construction Waste			1,219
Demolition Waste			
Creative Office	125,500 sf	155	9,726
Production Support	29,400 sf	155	2,279
Sound Stages	5,600 sf	155	434
Total Demolition Waste			12,439
Total for Construction and Demolition Waste			13,657
Total After 75-Percent Recycling			3,414

Ib = pound

sf = square feet

Source: Eyestone Environmental, 2017.

90 percent by the year 2025.⁸⁰ The estimated annual net increase in solid waste that would be generated by the Project represents approximately 0.06 percent of the City's annual solid waste disposal⁸¹ and approximately 0.002 percent of the remaining capacity for the County's Class III landfills open to the City of Los Angeles.⁸² The Project's estimated solid waste generation would therefore represent a nominal percentage of the remaining daily disposal capacity of the County's Class III landfills.

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

^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 4 and Table 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types.

b Numbers have been rounded to the nearest whole number.

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 December 13, 2017.

⁸¹ 1,715 tons per year/2.71 million tons per year x 100 = 0.06%

⁸² 1,715 tons per year/85.45 million tons x 100 = 0.002%

Table B-2
Estimated Project Solid Waste Generation

Building	Size	Employees per 1,000 sf	Estimated No. of Employees ^c	Solid Waste Generation Rate ^b	Total Generation (tons/year) ^c
Existing to be Removed					
Creative Office	125,500 sf	4	502	0.92 tons/emp/yr	462
Production Support	29,400 sf	4	118	0.92 tons/emp/yr	108
Sound Stages	5,600 sf	4	22	0.92 tons/emp/yr	21
Total Existing					591
Proposed	•				
Creative Office	599,350 sf	4	2,397	0.92 tons/emp/yr	2,206
Production Support	27,200 sf	4	109	0.92 tons/emp/yr	100
Sound Stages	0				0
Total Project					2,306
Total Net Increase					1,715

du = dwelling unit

emp = employee

lb = pound

sf = square feet

Source: Eyestone Environmental, 2017.

of the Project. Therefore, 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 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,

Employee generation rates based on Applicant experience with office projects of similar scope.

Non-residential yearly solid waste generation factors are from City of Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study, Table 4, July 2002. A solid waste generation rate of 0.92 tons per employee per year was used (Services—Motion Picture).

c Numbers have been rounded.

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 plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste⁸³ on and after April 1, 2016, depending on the amount of waste generated per 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.

The Project would comply with and 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. 171687), which requires that development projects include an on-site recycling area or room of specified size. He 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.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?				

Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and foodsoiled paper waste that is mixed in with food waste.

Ordinance No. 171687, adopted by the Los Angeles City Council on August 6, 1997.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				

a) Does the project have the potential to 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, the Project does have the potential to degrade the quality of the environment or affect important examples of California's history or prehistory. Therefore, further evaluation of this topic will be provided in the EIR.

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. Located within the vicinity of the Project Site are other past, current and probable future projects, the development of which may have cumulative impacts. Potential cumulative impacts will be addressed in the EIR for the following environmental factors: aesthetics; air quality; cultural resources; greenhouse gas emissions; land use and planning; noise; public services (fire protection and police protection); transportation/traffic; tribal cultural resources; and utilities and service systems (water supply and infrastructure and wastewater generation and infrastructure).

With regard to cumulative effects on agriculture/forestry resources, biological resources, and mineral resources, no such resources are located on the Project Site or in the surrounding area. Due to the highly urbanized and developed nature of the Project Site and surrounding area, no agriculture and forestry resources, sensitive biological species or natural communities or mineral resources are present within the Project Site or in the surrounding area. Therefore, cumulative impacts would be less than significant.

With regard to the cumulative effects of past, present and future projects on geology and soils, the Hollywood Community Plan Area is built out and, therefore, it is unlikely that any projects would propose mining operations, or other similar uses that require boring or deep excavation into the Earth that could exacerbate existing environmental conditions (i.e., trigger rupture of a known earthquake fault, strong seismic ground shaking, or trigger seismic-related ground failure or landslides) such that people or structures would be exposed to potential adverse effects. Similarly, sewers are already

available and soil adequacy would not be an issue if there were the need for alternative wastewater disposal systems. In addition, the Project Site area is relatively flat and impervious and, as such, there would be less-than-significant impacts from landslides, soil erosion/loss of topsoil, unstable geologic units, or expansive soils.

With regard to cumulative effects of hazards and hazardous materials, the presence of these materials are generally site specific and need to be evaluated within the context of each individual project. In addition, since the Hollywood Community Plan Area is developed with mostly commercial and residential uses, none of the past, present or future projects would likely involve the routine use or transport of hazardous materials beyond those already that are commonly used (e.g., cleaning agents and paint thinners, etc. used for studio and set production uses). Furthermore, projects would be required to comply with existing regulatory requirements regarding the storage, handling and disposal of hazardous materials. Finally, in terms of hazardous sites, EnviroStor shows that there are no identified federal superfund or State response sites within the vicinity of the Project Site, only school investigation, school cleanup or voluntary cleanup sites. Therefore, past, present and future projects would not exacerbate existing environmental conditions and cumulative impacts would be less than significant.

With regard to cumulative effects of hydrology and water quality, due to the highly urbanized nature of the Hollywood Community Plan Area, there are no streams or rivers, FEMA flood hazard areas or other existing hydrological features that could be physically altered such that there would be substantial erosion, siltation or flooding. Similarly, past, present and future projects are unlikely to materially impair the Hollywood Reservoir and Mulholland Dam. In terms of runoff, all projects would be required at minimum to create stormwater mitigation plans and/or comply with the City's LID ordinance, thereby minimizing the potential for polluted runoff. In terms of groundwater, USGS maps indicate that there are no active wells nearby, or wells that are below normal groundwater levels. Nevertheless, all projects would comply with standard construction practices should dewatering be required. Therefore, it is unlikely that the projects would substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or lowering of the local groundwater table level. Cumulative impacts on hydrology and water quality would be less than significant.

In terms of, population and housing, the past, present and future projects would not induce substantial population growth since the Hollywood Community Plan Area is already fully developed and occupied by a long-standing residential population. In addition, not all projects, like the Sunset Gower Studios Enhancement Plan Project, would propose residential uses. While this Project would not displace housing or people, other projects might displace existing housing and people residing in them. However, because the Hollywood Community Plan Area is built out, it is likely that those proposed projects would be located on infill sites and, as such, substantial numbers of housing or people would not be displaced such that replacement housing would be required elsewhere. Even if construction of replacement housing were required elsewhere, such developments would likely occur on infill sites within the City of Los Angeles and the appropriate level of environmental review would be conducted to analyze the extent to which the projects could cause significant environmental impacts. Cumulative impacts from population and housing would be less than significant.

With regard to public services and recreation (schools, parks and recreation, libraries), the past, present and future projects could increase the demand for these services and facilities. However, since the Hollywood Community Plan Area is fully developed, it contains numerous facilities (i.e., libraries, parks and parks/recreational facilities) that provide these services. Therefore, it is unlikely that expanded or new facilities would be required. Even if they were, because of the built out, urbanized nature of the area, such facilities would likely be located on infill sites, which may either qualify for categorical exemptions or would be required to undergo environmental review on a case-by-case basis. Appropriate mitigation measures for each project would address potential environmental impacts. In the case of recreation (i.e., existing neighborhood and regional parks), projects would be required to provide amenity space (e.g. gyms, outdoor decks with pools, etc.) that would help reduce the demand on neighborhood and regional parks, thereby reducing the likelihood that there would be substantial deterioration of parks. Therefore, it is unlikely that the past, present and future projects would have significant cumulative environmental impacts from the construction or expansion of such facilities.

Lastly, in terms of utilities and service systems, since the Hyperion Water Reclamation Plant is in compliance with the State's wastewater treatment requirements, and the wastewater generated by that past, present and future projects would most likely be typical of urban uses, no industrial discharges into the wastewater system are likely to occur that would exceed the wastewater treatment requirements of the Regional Water Quality Control Board. Consequently, there would be no need to construct new or expand wastewater treatment facilities, the construction of which could cause significant environmental effects. Similarly, since the Hollywood Community Plan Area is fully developed with stormwater drainage facilities, the projects would not require the construction of new storm water drainage facilities, the construction of which could cause significant environmental effects. In terms of water supplies and wastewater treatment providers, the projects would be served by the existing commitments of the LADWP and LA Sanitation. Similarly, in terms of solid waste, the estimated net increase in solid waste generated by the projects would most likely represent a minor percentage of the remaining disposal capacity for the County's Class III landfills open to the City. Also, since the 2016 ColWMP Annual Report anticipates that future solid waste disposal needs can be adequately met through 2031 throughout the County, it is unlikely the projects would require the expansion or opening of a new landfill. Therefore, cumulative impacts on utilities and service systems would be less than significant.

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

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project could result in potentially significant impacts with regard to the following topics: air quality; cultural resources; greenhouse gas emissions; land use and planning; noise; fire protection; police protection; transportation/circulation; tribal cultural resources; water supply and infrastructure; and wastewater generation and infrastructure. As a result, these potential environmental effects, which could cause adverse effects on humans, will be analyzed further in additional environmental review.