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

INITIAL STUDY

Hollywood and Cahuenga Project

Case Number: ENV-2020-3739-EIR

Project Location: 1708–1726 Cahuenga Boulevard and 6381–6385 Hollywood Boulevard, Los Angeles, California, 90028

Community Plan Area: Hollywood

Council District: 13—O'Farrell

Project Description: The Hollywood and Cahuenga Project includes the development of an office tower on a 47,475-square-foot (1.09-acre) site located at 1708–1726 Cahuenga Boulevard and 6381–6385 Hollywood Boulevard (Project Site) in the Hollywood Community Plan Area of the City of Los Angeles (City). The Project Site is currently developed with a seven-story, 67,581-square-foot building at the corner of Hollywood Boulevard and Cahuenga Boulevard (6381 Hollywood Boulevard), referred to herein as the Security Pacific Bank Building (SPB Building), which is designated as a City Historic-Cultural Monument and is not a part of the Project; a single-story, 9,300-square-foot restaurant located at 1716 Cahuenga Boulevard; and a three-story, 12,113-square-foot vacant building located at 1724 Cahuenga Boulevard. The Project would include the development of 217,269 square feet of floor area consisting of approximately 210,769 square feet of office uses and 6,500 square feet of ground floor commercial (restaurant) space. The proposed uses would be located within a single 14-story building with a maximum height of 213 feet. In accordance with the Los Angeles Municipal Code (LAMC), the Project would provide a total of 858 vehicular parking spaces within eight subterranean parking levels, one ground floor parking level, and one above grade parking level. The existing restaurant and vacant buildings totaling 21,413 square feet would be demolished to accommodate the Project. Upon completion, the Project would result in a net increase of 195,856 square feet of floor area within the Project Site with a total floor area, including the existing SPB Building to remain, of 284,850 square feet which results in a of 6:1 floor-area ratio (FAR) across the Project Site.

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

PREPARED BY:
Eyestone Environmental, LLC

APPLICANT:
Onni Group

June 2021

INITIAL STUDY

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1 INTRODUCTION

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

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

1.1 PURPOSE OF AN INITIAL STUDY

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

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

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

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1. INTRODUCTION

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

2. EXECUTIVE SUMMARY

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

3. PROJECT DESCRIPTION

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

4. EVALUATION OF ENVIRONMENTAL IMPACTS

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

1.3 CEQA PROCESS

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

1.3.1 Initial Study

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

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

1.3.2 Draft EIR

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

1.3.3 Final EIR

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

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

2 EXECUTIVE SUMMARY

PROJECT TITLE	**HOLLYWOOD AND CAHUENGA PROJECT**
ENVIRONMENTAL CASE NO.	ENV- 2020-3739-EIR
RELATED CASES	CPC-2020-3738-ZCJ-HD-VCU-MCUP-SPP-SPE-RDP

PROJECT LOCATION	1708–1726 Cahuenga Boulevard and 6381–6385 Hollywood Boulevard, Los Angeles, CA 90028
COMMUNITY PLAN AREA	Hollywood
GENERAL PLAN DESIGNATION	Regional Center Commercial
ZONING	C4-2D-SN and [Q]C4-2D-SN (Commercial zone, Height District 2 with Development Limitation, Hollywood Signage Supplemental Use District)
COUNCIL DISTRICT	13—O'Farrell

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

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

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

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

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

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

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

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

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

9) The explanation of each issue should identify:

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

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

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Hollywood and Cahuenga (Project) includes the development of an office tower on a 47,475-square-foot (1.09-acre) site located at 1708–1726 Cahuenga Boulevard and 6381–6385 Hollywood Boulevard (Project Site) in the Hollywood Community Plan Area of the City of Los Angeles (City). The Project Site is currently developed with a seven-story, 67,581-square-foot building at the corner of Hollywood Boulevard and Cahuenga Boulevard (6381 Hollywood Boulevard), referred to herein as the Security Pacific Bank Building (SPB Building), which is designated as a City Historic-Cultural Monument and is not a part of the Project; a single-story, 9,300-square-foot restaurant located at 1716 Cahuenga Boulevard; and a three-story, 12,113-square-foot vacant building located at 1724 Cahuenga Boulevard.

The Project would include the demolition of the existing restaurant and vacant buildings totaling 21,413 square feet and development of 217,269 square feet of floor area consisting of approximately 210,769 square feet of office uses and 6,500 square feet of ground floor commercial (restaurant) space. The proposed uses would be located within a single 14-story building with a maximum height of 213 feet. The Project would provide a total of 858 vehicular parking spaces within eight subterranean parking levels, one ground floor parking level, and one above grade parking level. The SPB Building, which is undergoing tenant improvements, would remain on the Project Site and continue to be used as office space. Upon completion, the Project would result in a net increase of 195,856 square feet of floor area within the Project Site with a total floor area, including the existing SPB Building to remain, of 284,850 square feet which results in a of 6:1 floor area ratio (FAR) across the Project Site.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located at 1708–1726 Cahuenga Boulevard and 6381–6385 Hollywood Boulevard within the Hollywood Community Plan Area of the City. As shown in Figure 1 on page 8, the Project Site is bound by Cahuenga Boulevard to the west, commercial buildings to the east, commercial buildings and Hollywood Boulevard to the south, and commercial buildings and uses to the north. Regional access to the Project Site is provided by the US-101, which is accessible within 1 mile of the Project Site. Local access to the Project Site is provided by several local streets and avenues, including Cahuenga Boulevard, Ivar Avenue, and Hollywood Boulevard.

3.2.2 Existing Conditions

As shown in Figure 2 on page 9, the Project Site is currently developed with three buildings ranging from one to seven stories and surface parking areas. Existing buildings on the Project Site include the seven-story (109-foot-tall), 67,581-square-foot SPB Building located at 6381 Hollywood Boulevard, which is designated as a City Historic-Cultural Monument; a single-story (19-foot-tall), 9,300-square-foot restaurant located at 1716 Cahuenga Boulevard; and a three-story (31-foot-tall), 12,113-square-foot vacant building located at 1724 Cahuenga Boulevard. Vehicular access to the Project Site is provided via two driveways along Cahuenga Boulevard. Pedestrian access to the Project Site is located along

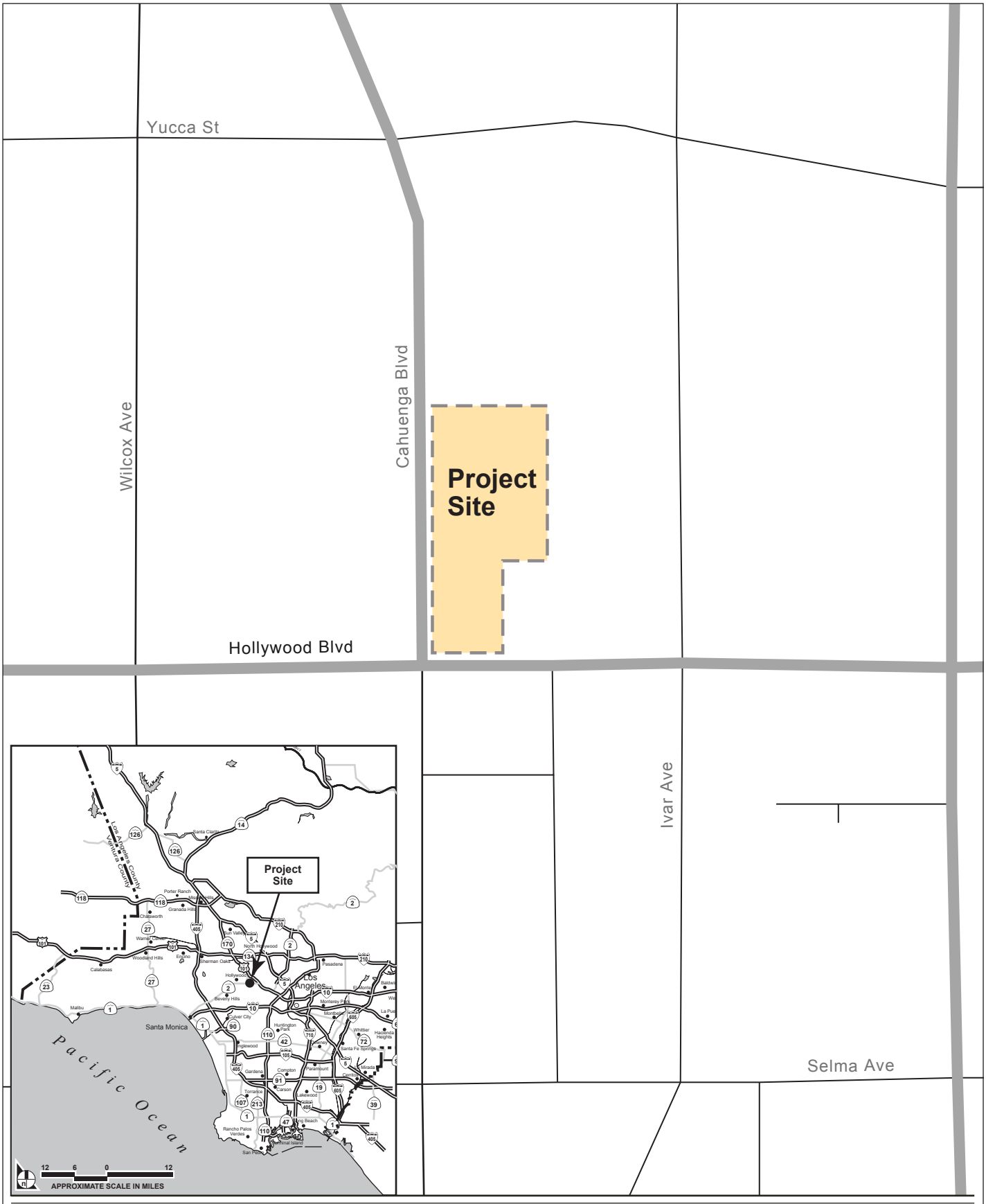

Figure 1
Project Location Map

Source: ArcGIS, 2020; Eyestone Environmental, 2020.

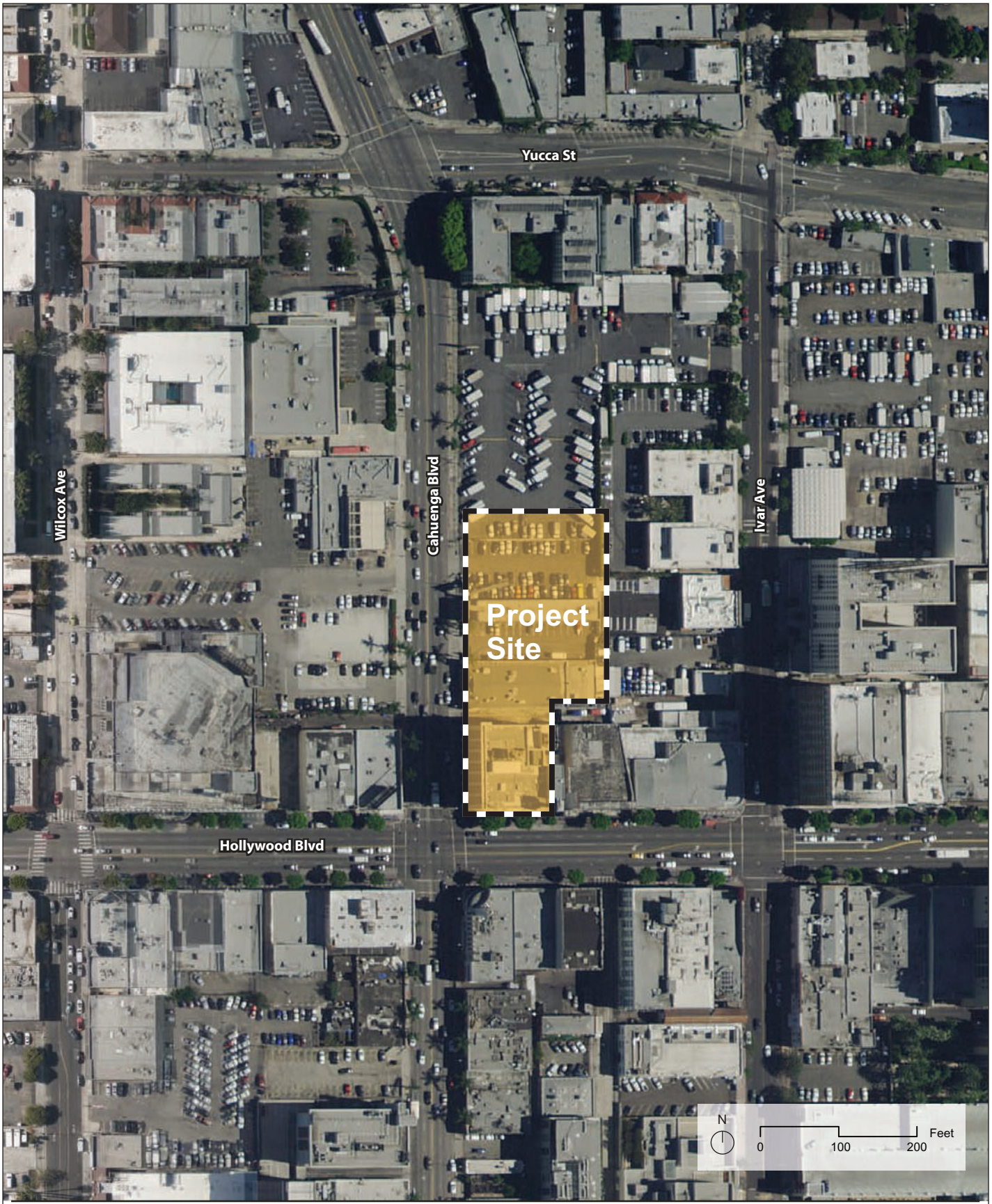

Figure 2
Aerial Photograph of the Project Site and Vicinity

Source: Apple Maps, 2020; Eyestone Environmental, 2020.

Cahuenga Boulevard and Hollywood Boulevard. The Project Site is gently sloping to the south, with a 2- to 2.5-foot-high retaining wall along the northern property line. Existing landscaping within the Project Site includes four non-protected[2] Palm trees and grasses within small planter areas. Adjacent to the Project Site are two Ficus trees along Hollywood Boulevard, which would be retained as part of the Project.

3.2.3 General Plan and Zoning

The Project Site is located within the planning boundary of the Hollywood Community Plan[3] area. The Project Site has a General Plan land use designation of Regional Center Commercial. The northern 100 feet of the Project Site is zoned C4-2D-SN and the remainder of the Project Site is zoned [Q]C4-2D-SN (Commercial zone, Height District 2 with Development Limitation, Hollywood Signage Supplemental Use District). Pursuant to the LAMC, the C4 Zone permits a wide array of land uses including commercial, office, residential, retail, and hotel uses. The [Q] prefix indicates specific conditions applicable to the portion of the Project Site zoned [Q]C4-2D-SN as a result of a zone change (Ordinance No. 181077) granted for the adaptive reuse of the SPB Building from office into a hotel and construction of a three-story commercial and parking building for hotel office and retail uses. The adaptive reuse and new commercial and parking building were never constructed. The "D" limitation restricted the FAR to 4.5:1 for the [Q]C4-2D-SN zoned portion. Height District 2, in conjunction with the C4 Zone, typically does not impose a maximum building height limitation and permits a maximum 6:1 FAR; however, pursuant to the "D" Limitation (per Ordinance No. 165,660-SA220, adopted in 1990) the total floor area permitted is a maximum FAR of 2:1 with a maximum height of 45 feet; however, a project could exceed the 2:1 FAR subject to certain conditions.[4] The SN designation indicates that these parcels are located within the Hollywood Signage Supplemental Use District (HSSUD), where signage is subject to unique characteristics of which can be enhanced by the imposition of special sign regulations designed to enhance the theme or unique qualities of that district, or which eliminate blight through a sign reduction program. The Project Site is also located within the boundaries of the Hollywood Redevelopment Plan, which establishes a base FAR limit of 4.5:1 for all development with a land use designation of Regional Center. The Redevelopment Plan permits FAR in excess of 4.5:1 not to exceed 6:1 FAR provided that the proposed development furthers the goals and intent of the Redevelopment Plan and the Hollywood Community Plan.

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2 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.

3 The City is currently in the process of updating the Hollywood Community Plan.

4 The conditions are: a) The Community Redevelopment Agency Board finds that the project conforms to: (1) the Hollywood Redevelopment Plan, (2) a Transportation Program adopted by the Community Redevelopment Agency Board pursuant to Section 518.1 of the Redevelopment Plan, (3) the Hollywood Boulevard District urban design plan as approved by the City Planning Commission and adopted by the CRA Board pursuant to Sections 501 and 506.2.1 of the Hollywood Redevelopment Plan; and, If applicable, (4) any Designs for Development adopted pursuant to Section 503 of the Redevelopment Plan; and b) The project complies with the following two requirements: A Disposition and Development Agreement or Owner Participation Agreement has been executed by the Community Redevelopment Agency Board; and the Project is approved by the City Planning Commission, or the City Council on appeal, pursuant to the procedures set forth In Municipal Code Section 12.24 B.3.

The Project Site is also identified as being located in a Transit Priority Area (TPA), as defined by Senate Bill (SB) 743 and City Zoning Information File (ZI) 2452.[5] The Project Site is well served by a variety of public transit options along Hollywood Boulevard provided by the Los Angeles County Metropolitan Transit Authority (Metro) and the Los Angeles Department of Transportation (LADOT). Specifically, transit options in the vicinity of the Project Site include the Hollywood/Vine station of the Metro B (Red) Line; Metro bus lines 212, 217, 222, and 312; and DASH Hollywood.

3.2.4 Surrounding Land Uses

The Project Site is located in a highly urbanized area and is developed primarily with a mix commercial and residential uses. Land uses located adjacent to the Project Site include a vehicle rental facility and a four-story residential building to the north; a single-story commercial building and an ancillary surface parking lot to the west; a seven-story office building to the south; and two-story commercial and office buildings and ancillary surface parking to the west. The uses surrounding the Project Site are designated as Regional Center Commercial, and are zoned C4-2D-SN. As previously discussed, the Project Site is also located within 0.5 mile of the Hollywood/Vine station of the Metro B (Red) Line.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Project would include the development of 217,269 square feet of floor area consisting of approximately 210,769 square feet of office uses and 6,500 square feet of ground floor commercial (restaurant) space. The proposed uses would be located within a single 14-story building with a maximum height of 213 feet. In accordance with the LAMC, the Project would provide a total of 858 vehicular parking spaces within eight subterranean levels, one ground floor parking level, and one above grade parking level. The existing restaurant and vacant buildings on the Project Site totaling 21,413 square feet would be demolished to accommodate the Project. The SPB Building (which is on the Project Site, but not part of the Project) would remain on the Project Site and would continue to be used as office space. Upon completion, the Project would result in a net increase of 195,856 square feet of floor area within the Project Site with a total floor area, including the existing SPB Building to remain, of 284,850 square feet which results in a FAR of 6:1 across the Project Site.

3.3.2 Design and Architecture

As previously discussed, the proposed uses would be located within a single 14-story building with a maximum height of 213 feet. As shown in Figure 3 on page 12, the proposed building's ground floor would include the commercial uses; a lobby; and back of house uses.[6] Also, at the ground level would be additional parking. Above the ground level, Level 2 would include additional parking. Levels 3 through 13

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[5] SB 743 established new rules for evaluating aesthetic and parking impacts under CEQA for certain types of projects. Specifically, Public Resources Code Section 21099(d) states: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." TPAs are areas within 0.5 mile of a major transit stop that are existing or planned. Thus, in accordance with SB 743 and the City's Zoning Information (ZI) No. 2452, the Project's aesthetic and parking impacts are not considered significant as a matter of law.

[6] Back of house uses include storage for inventory, trash and recycling, loading docks, maintenance facilities, etc.

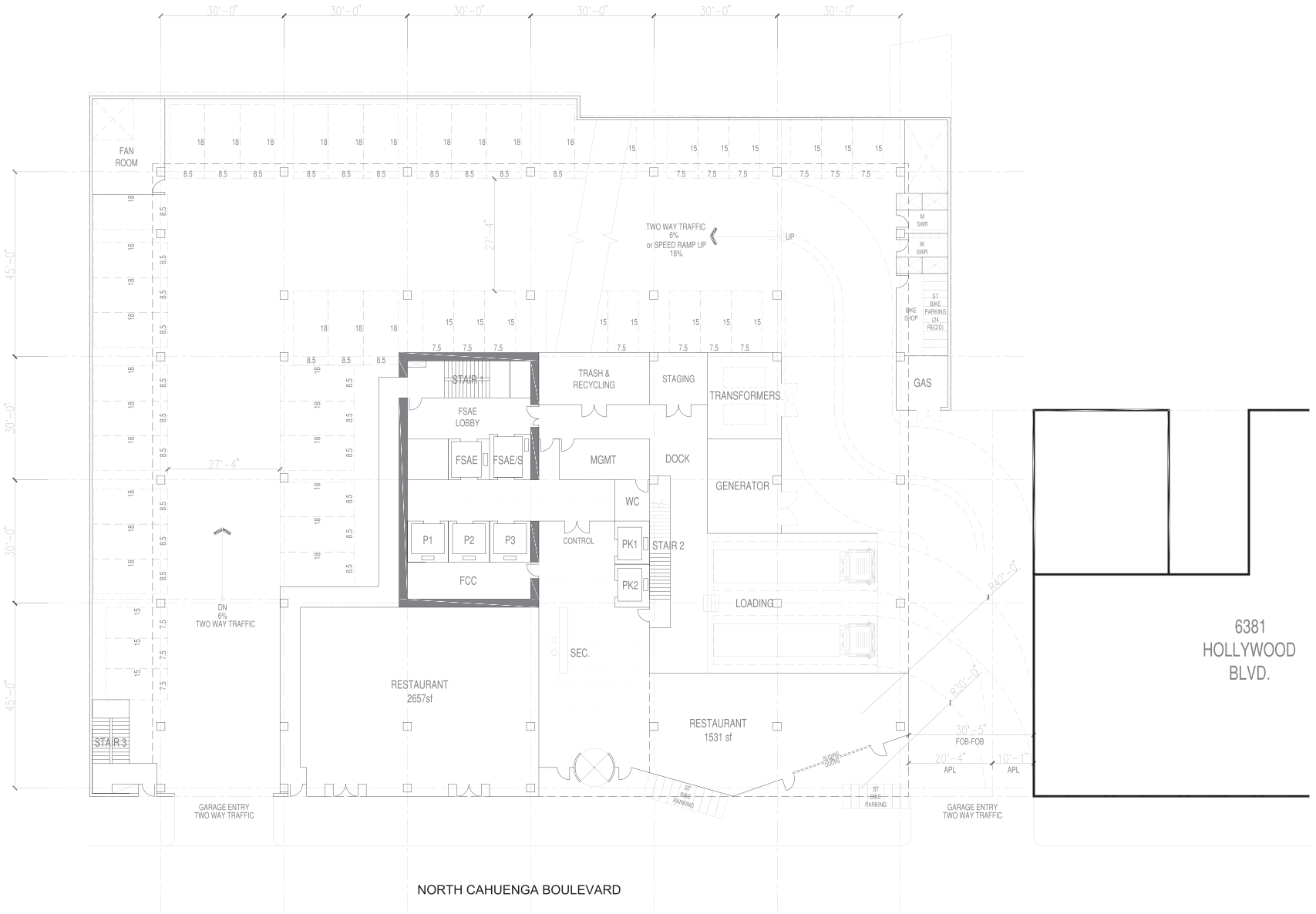

Figure 3
Conceptual Site Plan
Ground Floor

Source: SCB, 2021.

would include the proposed office uses, as shown in Figure 4 through Figure 6 on pages 14 through 16, respectively. As discussed further below, Level 7 of the building would include a large tenant terrace which aligns with the roof elevation of the SPB Building to provide massing relief and Level 14 of the building would include an amenity deck with outdoor amenities to serve building tenants. Existing vehicular access to the Project Site would continue to be provided through Cahuenga Boulevard and would be provided along the existing service alley (which is located immediately north of the SPB Building) via two, two-way driveways that would provide access to the building's parking. Parking would be provided on Levels 1 and 2, with eight additional parking levels beneath the ground floor on Levels B1–B8.

The proposed mixed-use building would be designed to complement adjacent structures, including a large commercial structure to the east and the SPB Building, through the utilization of similar massing and material cues. The Project would feature neutral colored glass; ceramic frit; matching grey metal; and eased corners similar to the adjacent structure. As discussed above, the Project would incorporate a large tenant terrace, which would be designed to enhance the cornice line of the adjacent building and an amenity deck, which would be located on the rooftop of the building and be designed similar in spirit to the nearby Montalban Theater. The Project would also include an open panel roof sign, which would serve to integrate the proposed building into the surrounding district.

3.3.3 Open Space and Landscaping

The Project would incorporate a variety of open space and amenities throughout the Project Site. As shown in Figure 7 on page 17, the building would include an 8,100-square-foot amenity deck that would be located on the rooftop of the building and would feature outdoor dining seating, lounge seating, fire pits, televisions, and landscaping. As shown in Figure 8 on page 18, the Project would also include a 1,232-square-foot terrace on the seventh floor, which would provide seating, lounge areas, fire pits, and landscaping. Additional common open space, totaling 540 square feet, would be provided on the first floor of the building and would include walkways, outdoor dining seating, new trees, and raised planters. In total, the Project would provide approximately 9,872 square feet of open space and amenities. The landscape palette would include plantings that are of low-water use and would feature high-color species trees and robust, environmentally appropriate grasses and seasonal wildflowers in simple planter beds.

As part of the Project, the four existing on-site non-protected trees would be removed to accommodate development of the Project. In accordance with the Department of City Planning's policy, the on-site trees to be removed would be replaced on a 1:1 basis. Overall, the Project would provide 15 new trees (four street trees and nine rooftop trees). Proposed street trees would follow City guidelines for species selection.

3.3.4 Access, Circulation, and Parking

Vehicular access to the Project Site would be provided via two, two-way driveways along Cahuenga Boulevard that would provide access to the building's ground-level, second-level, and subterranean parking. The two-way driveway adjacent to the SPB Building would also provide access for freight vehicles to the loading area. Primary pedestrian access to the building would be provided along Cahuenga Boulevard.

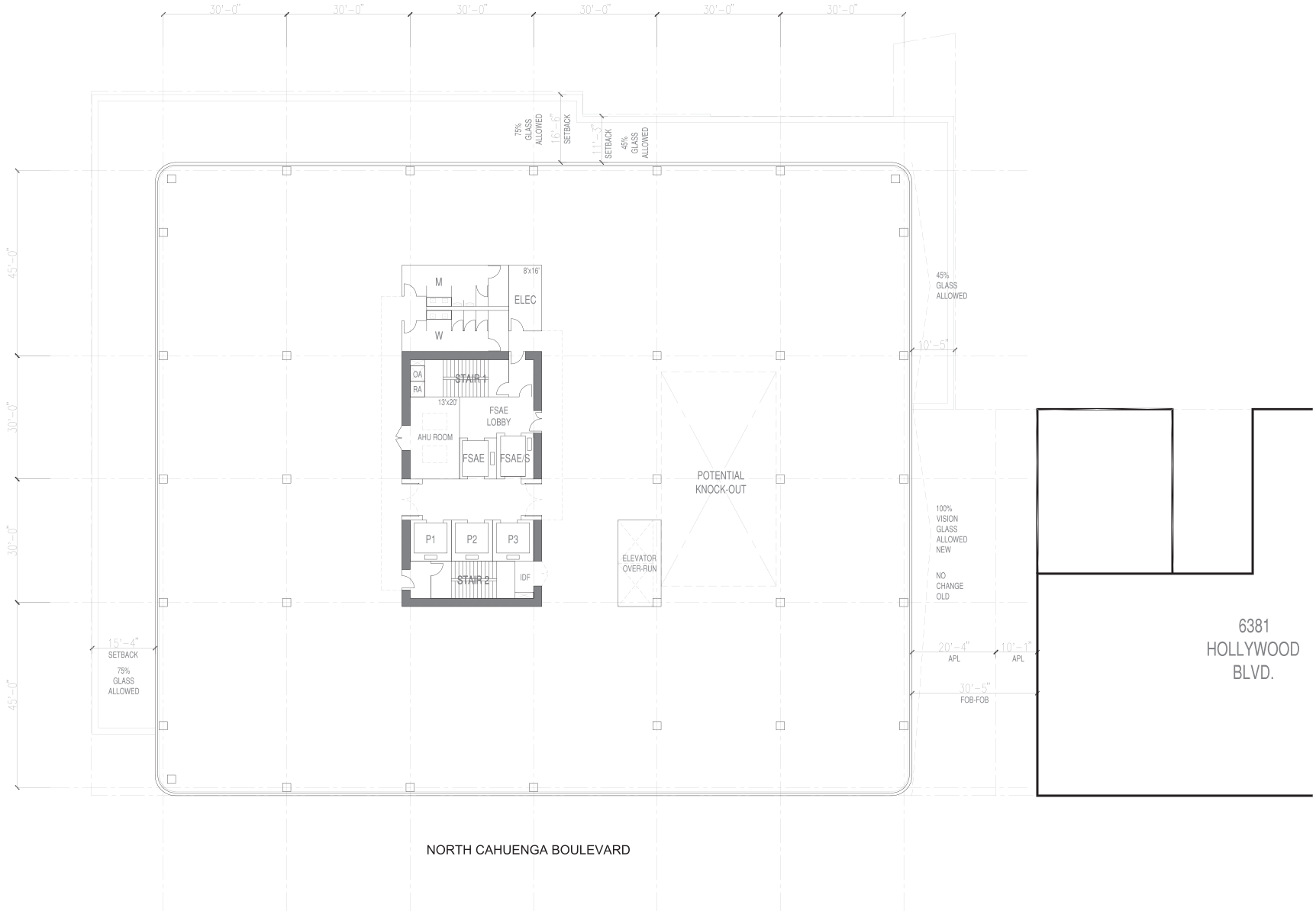

Figure 4
Conceptual Site Plan
Levels 3 through 6

Source: SCB, 2021.

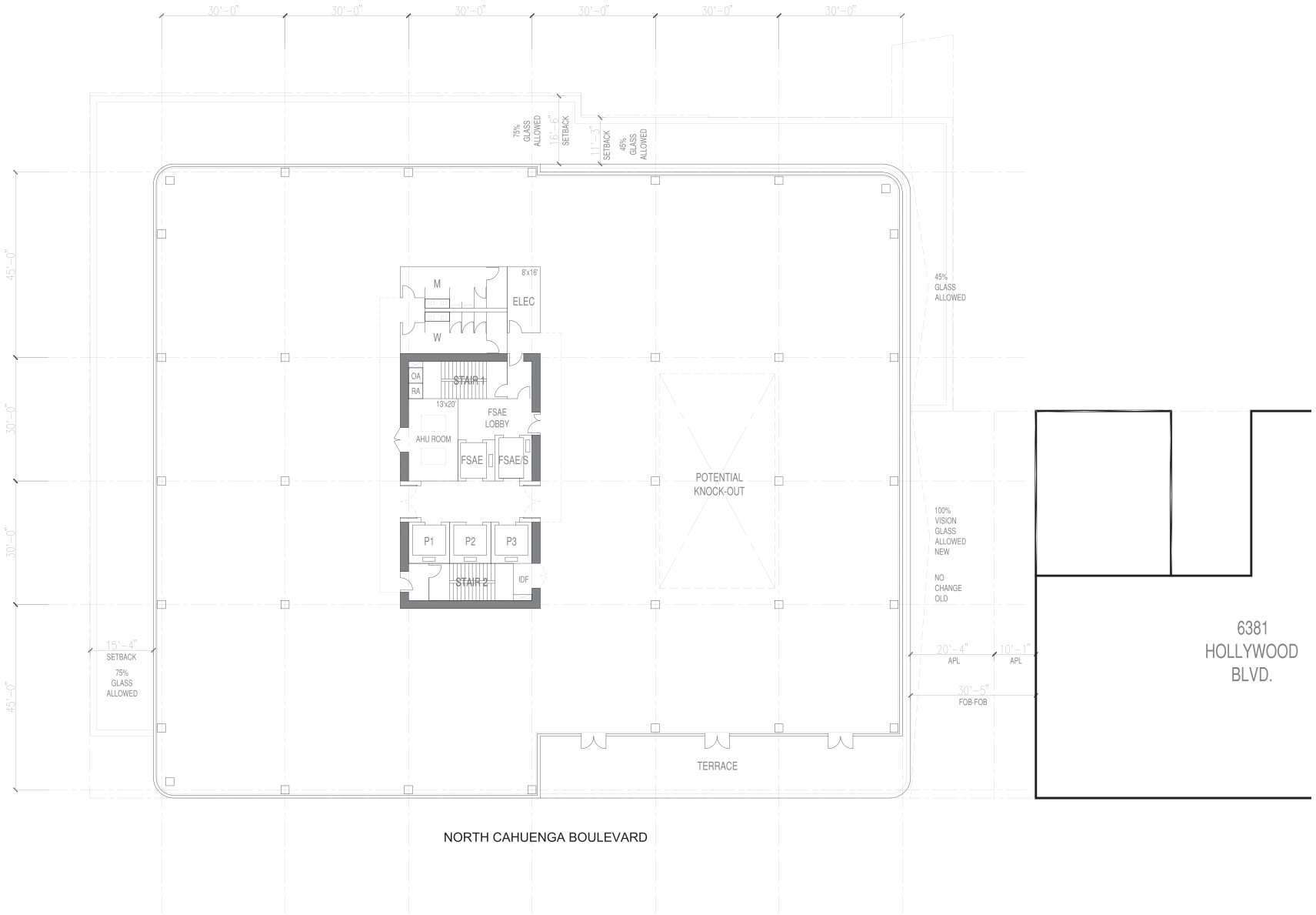

Figure 5
Conceptual Site Plan
Levels 7 and 8

Source: SCB, 2021.

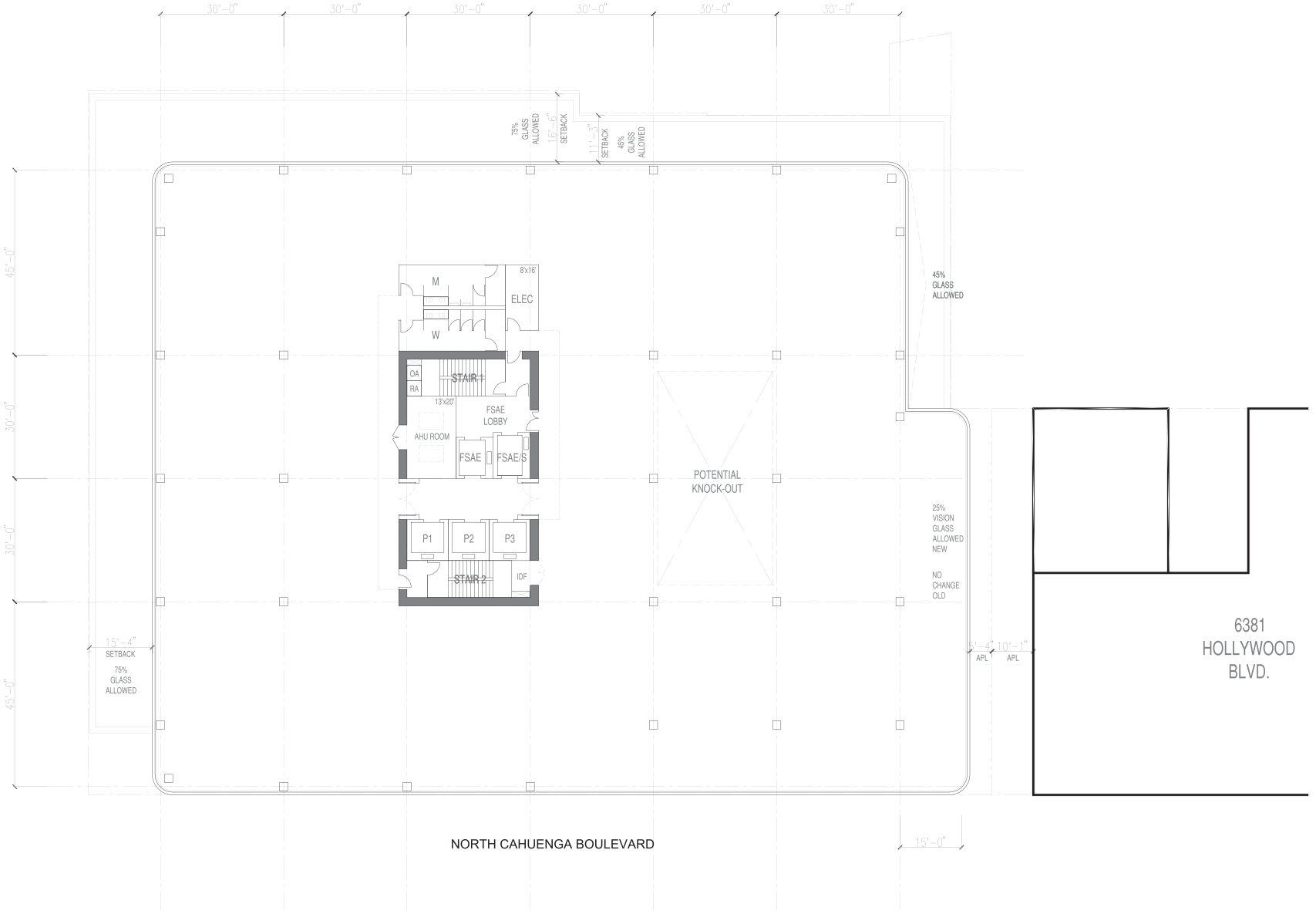

Figure 6
Conceptual Site Plan
Levels 9 through 13

Source: SCB, 2021.

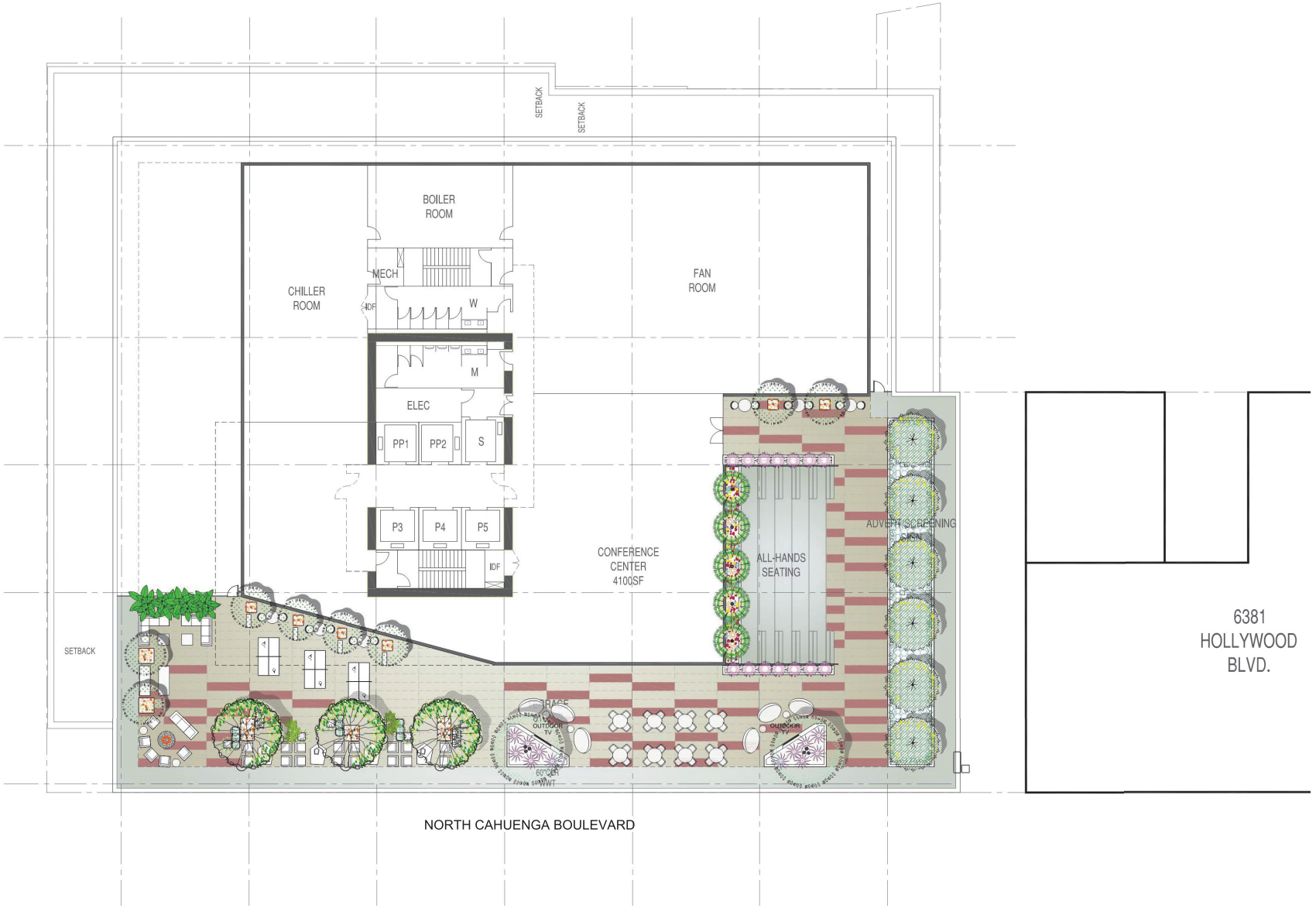

Figure 7
Open Space Plan
Rooftop

Source: SCB, 2021.

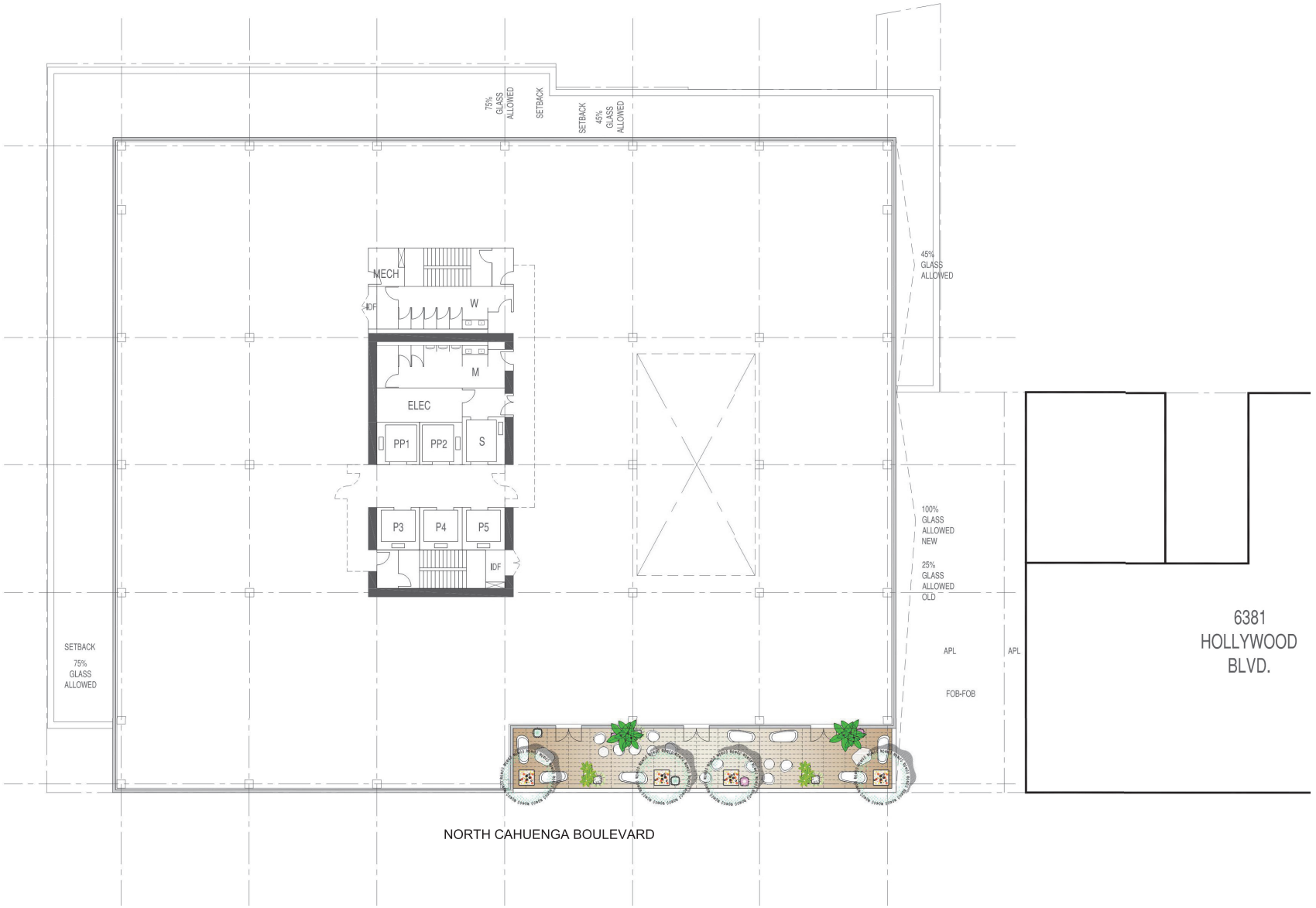

Figure 8
Open Space Plan
Seventh Floor

Source: SCB, 2021.

Based on LAMC requirements the Project would be required to provide a minimum of 487 vehicle parking space; however, under Section 12.21 A.4(x)(3)6 for the proposed land uses, the Project would provide a minimum of 451 vehicle parking spaces. The Project also includes parking for the Historic Pacific Building and allows 3.5 stalls/1000 square feet for the new office building to account for the demand required in the Hollywood area. Overall, the Project would provide a total of 858 vehicle parking spaces within eight subterranean levels, which would extend to a maximum depth of 82 feet, in one ground floor parking level, and in one above grade parking level.

3.3.5 Lighting and Signage

Project lighting would incorporate architecturally integrated low-level exterior lights on the building and along walkways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the site. Project lighting would also be designed to minimize light trespass from the Project Site and minimize sky-glow to increase night sky access. All exterior lighting would be dimmable and automatically controlled via occupancy sensors and photo sensors to allow for the appropriate control of nighttime lighting. Interior lighting would be dimmable and controlled to meet all prevailing code requirements, which includes the use of occupancy sensors, multi-scene presets, and timeclock events.

Proposed signage would include identity signage, building and tenant signage, and general ground level and way-finding pedestrian signage that would comply with LAMC and HSSUD signage regulations. The Project also proposes an open panel roof sign (31 feet 6 inches by 70 feet) as defined by LAMC Ordinance 181340.7.H, which would face south on the southern edge of the rooftop for maximum visibility along Hollywood Boulevard. The Project would not include signage with flashing or mechanical properties. 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.

3.3.6 FAR and Setbacks

As discussed above, the Project Site is designated as Regional Center Commercial and zoned C4-2D-SN and [Q]C4-2D-SN (Commercial zone, Height District 2 with Development Limitation, Hollywood Signage Supplemental Use District). The Project requests approval of a Zone and Height District Change on the Project Site from C4-2D-SN and [Q]C4-2D-SN to (Q)C4-2-SN which would allow for the proposed height of the new office tower and permit a 6:1 FAR. The Project proposes 284,850 square feet of floor area, including the SPB Building, which results in 6:1 FAR based on the lot area of 47,475 square feet. Under the C2 zone, no setbacks are required for commercial uses; however, the new office tower would provide a 15-foot side yard setback along the northern property line and an 11-foot rear yard setback. In addition, although not a setback, the new building would be internally separated from the SPB Building by approximately 30 feet.

3.3.7 Sustainability Features

The Project has been designed and may be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce energy and water usage and waste and, thereby, reduce

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

3.3.8 Anticipated Construction Schedule

Construction of the Project would commence with demolition of the existing structures. This phase would be followed by grading and excavation for the subterranean parking. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to be completed in Q4 2026. It is estimated that approximately 158,490 cubic yards of export would be hauled from the Project Site.

3.4 REQUESTED PERMITS AND APPROVALS

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

- Pursuant to LAMC Section 12.32 Q, a Vesting Zone and Height District Change from C4-2D-SN and [Q]C4-2D-SN to (Q)C4-2-SN;
- Pursuant to LAMC Section 16.05 C.1, Site Plan Review for more than 50,000 square feet of commercial uses.
- Pursuant to LAMC Section 12.24 T and 12.24 W.19, a Vesting Conditional Use Permit to permit FAR averaging in a Unified Development;
- Pursuant to LAMC Section 12.24 W.1, Master Conditional Use Permit to allow for the sale of a full line of alcoholic beverages in conjunction with two potential restaurants;
- Pursuant to LAMC Section 11.5.14, Redevelopment Plan Compliance Review for the Hollywood Redevelopment Plan;
- Pursuant to LAMC Section 11.5.7 C, Project Permit Compliance Review for the Hollywood Signage Supplemental Use District;
- Pursuant to LAMC Section 11.5.7 F, an Exception from Hollywood Signage Supplemental Use District to permit an open panel rooftop sign on the new building;
- Pursuant to 17.15, a Vesting Tentative Tract Map for the merger and resubdivision of the Project Site into two ground lots and for commercial condominium purposes, and pursuant to LAMC Section 17.13, approval of a haul route.
- Other discretionary and ministerial permits and approvals that are or may be required, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

3.5 RESPONSIBLE PUBLIC AGENCIES

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

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) Section 21099(d)] sets forth new guidelines for evaluating project transportation impacts under the California Environmental Quality Act (CEQA), as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." PRC Section 21099(a)(7) defines a "transit priority area" as an area within 0.5 mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21099(a)(4) 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."

The related City of Los Angeles (City) Department of City Planning (Planning Department) 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 L.A. CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA."[7]

PRC Section 21099 applies to the Project because, consistent with Section 21099(d)(1), the Project is an employment center project that would be located on an infill site within a transit priority area. Specifically, as described in Section 3, Project Description, of this Initial Study, the Project includes the development of office space and ground floor commercial uses. The Project Site is located on an infill site, as that term is defined in PRC 21099(a)(4), because the Project Site includes lots located within an urban area that has been previously developed. The Project Site is also located within a transit priority area, as that term is defined in PRC Section 21099(a)(7), because it is located within one-half mile of an existing "major transit stop." The Project Site is located within 0.5 mile of the Hollywood/Vine station of the Los Angeles County Metropolitan Transit Authority's (Metro) Metro B (Red) Line. The Hollywood/Vine station qualifies as a major transit stop (as that term is defined in PRC Section 21064.3) because it provides rail transit service with intervals of 15 minutes or less during morning and afternoon peak commute periods. Therefore, the Project Site is located in a transit priority area as defined in PRC 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 ZI No. 2452. As a result, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA.

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

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

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

No Impact. A scenic vista is a panoramic view of a valued visual resource.[8] 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. Panoramic views are typically associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies. Focal views are also relevant when considering this question from Appendix G of the CEQA Guidelines. Examples of focal views include natural landforms, public art/signs, individual buildings, and specific, important trees.

Valued visual resources in the vicinity of the Project Site include the Hollywood Hills and the Hollywood Sign, a City of Los Angeles-designated historic cultural monument, to the distant north of the Project Site. Adjacent to the Project Site, views of the Hollywood Hills and the Hollywood Sign are available along north-south streets such as Cahuenga Boulevard and along Hollywood Boulevard looking north in between buildings. The Project would replace the existing single-story and three-story buildings within the Project Site with a new 14-story building with a maximum height of 213 feet. The existing seven-story SPB Building located at Hollywood Boulevard and Cahuenga Boulevard would remain. The proposed building would be constructed north of the SPB Building and within the existing Project Site boundaries. Therefore, the Project would not block existing views of the Hollywood Hills or Hollywood Sign along Cahuenga Boulevard or along Hollywood Boulevard, and views of the Hollywood Hills and Hollywood Sign in the vicinity of the Project Site would continue to be available along Cahuenga Boulevard.

[8] City of Los Angeles, 2006 L.A. CEQA Thresholds Guide, p. A.2-1.

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 SB 743 and ZI No. 2452, the Project's aesthetics impact would not be considered significant.

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

No Impact. The Project Site is not located along a State scenic highway. The only State scenic highway within the City of Los Angeles is the Topanga Canyon State Scenic Highway, State Route 27 (SR-27), which travels through a portion of Topanga State Park. The nearest officially eligible State scenic highway is along the Foothill Freeway (I-210), approximately 16 miles northeast of the Project Site,[9] and the nearest City-designated scenic highway is along Los Feliz Boulevard, approximately 1.6 miles northeast of the Project Site.[10] Therefore, the Project would not substantially damage scenic resources within a State-designated scenic highway as no scenic highway is located adjacent to the Project Site. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impact would not be considered significant.

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

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

No Impact. The Project is located in an urbanized area. As such, this analysis focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

The Project would include the development of 217,269 square feet of floor area consisting of approximately 210,769 square feet of office uses and 6,500 square feet of ground floor commercial (restaurant) space. With regard to zoning, as discussed in Section 3, Project Description, of this Initial Study, the northern 100 feet of the Project Site is zoned C4-2D-SN and the remainder of the Project Site is zoned [Q]C4-2D-SN. The Project uses would be consistent with the types of uses permitted in the C4 Zone, which include commercial, office, residential, retail, and hotel uses. The [Q] prefix indicates specific conditions applicable to the portion of the Project Site zoned [Q]C4-2D-SN. The "D" limitation restricted the FAR to 4.5:1 for the [Q]C4-2D-SN zoned portion. Height District 2, in conjunction with the C4 Zone, typically does not impose a maximum building height limitation and permits a maximum 6:1 FAR; however, pursuant to the "D" Limitation (per Ordinance No. 165,660-SA220, adopted in 1990) the total floor area permitted is a maximum FAR of 2:1 with a maximum height of 45 feet. A project could exceed the 2:1 FAR subject to certain conditions.[11] In order to permit a FAR of 6:1, the Project has requested a

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9 California Scenic Highway Mapping System, Los Angeles County, www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, accessed April 9, 2019.

10 Mobility Plan 2035, Map A4.

11 The conditions are: (a) The Community Redevelopment Agency Board finds that the project conforms to: (1) the Hollywood Redevelopment Plan; (2) a Transportation Program adopted by the Community Redevelopment Agency Board pursuant to Section 518.1 of the Redevelopment Plan; (3) the Hollywood Boulevard District urban design plan as approved by the City

(Footnote continued on next page)

Vesting Zone and Height District Change from C4-2D-SN and [Q]C4-2D-SN to (Q)C4-2-SN. The SN designation indicates that these parcels are located within the Hollywood Signage Supplemental Use District (HSSUD), where signage is subject to unique characteristics of which can be enhanced by the imposition of special sign regulations designed to enhance the theme or unique qualities of that district, or which eliminate blight through a sign reduction program. The Project Site is also located within the boundaries of the Hollywood Redevelopment Plan, which establishes a base FAR limit of 4.5:1 for all development with a land use designation of Regional Center. The Redevelopment Plan permits FAR in excess of 4.5:1 not to exceed 6:1 FAR provided that the proposed development furthers the goals and intent of the Redevelopment Plan and the Hollywood Community Plan.

With regard to the City's regulations governing scenic quality, local land use plans applicable to the Project Site also include policies governing scenic quality, including the Citywide General Plan Framework Element, the Hollywood Community Plan (1988), the Hollywood Redevelopment Plan, and the Citywide Urban Design Guidelines. The Project's consistency with the general intent of these plans is briefly discussed below.

Citywide General Plan Framework

The City of Los Angeles General Plan Framework Element provides direction regarding the City's vision for future development in the City and includes an Urban Form and Neighborhood Design chapter to guide the design of future development. One of the key objectives of the Urban Form and Neighborhood Design Chapter is to enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm (Objective 5.5).[12] The Project Site is located in a highly urbanized area and is developed primarily with a mix of commercial and residential uses. The Project would enhance the built environment in the surrounding neighborhood and upgrade the quality of development by replacing two of the three existing buildings and surface parking lot with restaurant space and an office building that would be designed to complement adjacent structures. The Project would utilize similar massing and materials as adjacent structures as well as feature neutral colored glass; ceramic frit; matching grey metal; and eased corners similar to the adjacent structure. Overall, the proposed development would be designed in a contemporary architectural style that would be compatible with the general urban characteristics of the surrounding neighborhood. The office tower would also incorporate a large tenant terrace, which would be designed to enhance the cornice line of the adjacent building and an amenity deck, which would be located on the rooftop of the building and be designed similar in spirit to the nearby Montalban Theater. Additional common open space would be provided on the first floor of the building and would include walkways, outdoor dining seating, new trees, and raised planters. In addition, the Project would include an open panel roof sign, which would serve to integrate the proposed building into the surrounding district.

Planning Commission and adopted by the CRA Board pursuant to Sections 501 and 506.2.1 of the Hollywood Redevelopment Plan; and, If applicable, (4) any Designs for Development adopted pursuant to Section 503 of the Redevelopment Plan; and b) The project complies with the following two requirements: A Disposition and Development Agreement or Owner Participation Agreement has been executed by the Community Redevelopment Agency Board; and the Project is approved by the City Planning Commission, or the City Council on appeal, pursuant to the procedures set forth In Municipal Code Section 12.24 B.3.

[12] Los Angeles Department of City Planning, The Citywide General Plan Framework: An Element of the City of Los Angeles General Plan, Chapter 5, Urban Form and Neighborhood Design, re-adopted by City Council on August 8, 2001.

The Project would also encourage that signage be designed to be integrated with the architectural character of the buildings and convey a visually attractive character (Policy 5.8.4).[13] Proposed signage would be designed to be aesthetically compatible with the architecture of the Project and the surrounding area. As discussed in Section 3, Project Description, of this Initial Study, proposed signage would include identity signage, building and tenant signage, and general ground level and way-finding pedestrian signage that would comply with LAMC and HSSUD signage regulations. The Project also proposes an open panel roof sign (31 feet 6 inches by 70 feet) as defined by LAMC Ordinance 181340.7.H, which would face south on the southern edge of the rooftop for maximum visibility along Hollywood Boulevard. The Project would not include signage with flashing or mechanical properties. 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.

Overall, relative to the surrounding development, the Project design would complement the varying design elements of the uses adjacent to the Project Site and would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Urban Form and Neighborhood Design Chapter.

Hollywood Community Plan

As it relates to scenic quality, the Hollywood Community Plan includes the following objective and policy:

- That, where feasible, new power lines be placed underground and that the undergrounding of existing lines be continued and expanded.

As part of the Project, new power lines would be placed underground consistent with the public improvements section of the Hollywood Community Plan.

Hollywood Redevelopment Plan

Section 300 of the Hollywood Redevelopment Plan sets forth the goals of the Redevelopment Plan. Related to scenic quality, the Hollywood Redevelopment Plan provides the following goal:

> *5) Improve the quality of the environment, promote a positive image for Hollywood and provide a safe environment through mechanisms such as: a) adopting land use standards; b) promoting architectural and urban design standards including: standards for height, building setback, continuity of street facade, building materials, and compatibility of new construction with existing structures and concealment of mechanical appurtenances; c) promoting landscape criteria and planting programs to ensure additional green space; d) encouraging maintenance of the built environment; e) promoting sign and billboard standards; f) coordinating the provision of high quality public improvements; g) promoting*

[13] Los Angeles Department of City Planning, The Citywide General Plan Framework: An Element of the City of Los Angeles General Plan, Chapter 5, Urban Form and Neighborhood Design, re-adopted by City Council on August 8, 2001.

rehabilitation and restoration guidelines; h) integrate public safety concerns into planning efforts.

As previously discussed above, the Project would enhance the built environment in the surrounding neighborhood and upgrade the quality of development. Specifically, the Project would utilize similar massing and materials cues as adjacent structures as well as feature neutral colored glass; ceramic frit; matching grey metal; and eased corners similar to the adjacent structure. Overall, the proposed development would be designed in a contemporary architectural style that would be compatible with the general urban characteristics of the surrounding neighborhood. The Project would also enhance the streetscape by installing landscaping, including new street trees as well as outdoor dining seating and raised planters. The Project would also include an open panel roof sign, which would serve to integrate the proposed building into the surrounding district. Additionally, proper lighting of buildings and walkways would be incorporated to maximize visibility and provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building. Parking areas would also be lit to maximize visibility and reduce areas of concealments. Finally, entrances to, and exits from the building, would be designed to be open and in view of surrounding sites. Overall, the Project would support the Redevelopment Plan's goal to improve the quality of the environment.

Citywide Urban Design Guidelines

The Citywide Design Guidelines, adopted October 24, 2019, establishes ten guidelines to carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case. The Project would not conflict with the Citywide Design Guidelines, as discussed below.

Guideline 1: Promote a safe, comfortable and accessible pedestrian experience for all

The Project would enhance the streetscape adjacent to the Project Site by implementing a design that would enhance the pedestrian experience. Specifically, the Project ground floor commercial (restaurant) space would be designed to be highly visually permeable, thereby activating the streetscape. In addition, the Project would also install landscaping, including new street trees as well as providing walkways; outdoor dining seating; and raised planters, further activating the streetscape and improving the pedestrian experience, further activating the streetscape and improving the pedestrian environment. In addition, the Project would include low-level exterior lights adjacent to the building and along pathways that would serve to enhance the safety of pedestrians at night. Overall, these Project elements would promote a safe, comfortable, and accessible pedestrian experience for all.

Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience

Vehicular access to the Project Site would be provided via two, two-way driveways along Cahuenga Boulevard that would provide access to the building's ground-level, second-level, and subterranean parking. The two-way driveway adjacent to the existing seven-story commercial office building would also provide access for freight vehicles to the loading area. The proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and would incorporate pedestrian warning systems, as appropriate. Furthermore, the Project would install

landscaping, including new street trees and raised planters as well as providing outdoor dining seating, further activating the streetscape and improving the pedestrian experience.

Guideline 3: Design projects to actively engage with streets and public space and maintain human scale

The Project would activate the ground floor along the primary street frontage by introducing new ground floor commercial (restaurant) space, which would be designed to be highly visually permeable, thereby activating the streetscape. The Project would also install landscaping, including new street trees and raised planters as well as providing outdoor dining seating, further activating the streetscape and improving the pedestrian environment. Overall, the Project would be designed to actively engage with streets and public space and maintain human scale.

Guideline 4: Organize and shape projects to recognize and respect surrounding context

The Project Site is within a vibrant commercial area in the Hollywood Community Plan Area. The area surrounding the Project Site is developed primarily with a mix of commercial and residential uses. Land uses located adjacent to the Project Site include a vehicle rental facility and a four-story residential building to the north; a single-story commercial building and an ancillary surface parking lot to the east; a seven-story office building to the south; and two-story commercial and office buildings and ancillary surface parking to the west. As discussed in Section 3, Project Description, of this Initial Study, the Project would be designed to complement the varying design elements of the uses surrounding the Project Site.

Guideline 5: Express a clear and coherent architectural idea

The proposed mixed-use building would be designed to complement adjacent structures, including a large commercial structure to the east and the SPB Building, through the utilization of similar massing and material cues. The Project would feature neutral colored glass; ceramic frit; matching grey metal; and eased corners similar to the adjacent structure. In addition, the Project would incorporate a large tenant terrace, which would be designed to enhance the cornice line of the adjacent building and an amenity deck, which would be located on the rooftop of the building and be designed similar in spirit to the nearby Montalban Theater. The Project would also include an open panel roof sign, which would serve to integrate the proposed building into the surrounding district.

Overall, relative to the surrounding development, the Project design would complement the varying design elements of the uses adjacent to the Project Site.

Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience

As previously discussed, the Project would enhance the streetscape adjacent to the Project Site by developing an active ground floor commercial (restaurant) space and installing landscaping, including new street trees as well as providing walkways, outdoor dining seating, and raised planters. In addition, the Project would include low-level exterior lights adjacent to the building and along pathways that would serve to enhance the safety of pedestrians at night.

Guideline 7: Carefully arrange design elements and uses to protect site users

The Project includes the development of an office tower with ground floor commercial (restaurant) space. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is bound by Cahuenga Boulevard to the west, commercial buildings to the east, commercial buildings and Hollywood Boulevard to the south, and commercial buildings and uses to the north. Internal to the Project Site, pedestrian walkways would be provided along all driveways to minimize pedestrian-vehicular conflicts. The Project would also include lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into the building.

Guideline 8: Protect the site's natural resources and features

The Project Site is located in an urbanized area and is currently developed with office and commercial uses and associated surface parking areas. Landscaping within the Project Site includes several trees and grasses within small planter areas. As discussed further below, none of the trees within the Project Site and in the adjacent public right-of-way are considered protected by the City.

Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users

As discussed in Section 3, Project Description, of this Initial Study, the Project would be designed and constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce energy and water usage and waste and, thereby, reducing associated greenhouse gas emissions and minimizing the impact on natural resources and infrastructure.

Guideline 10: Enhance green features to increase opportunities to capture stormwater and promote habitat

The Project would manage stormwater through a capture and use system or biofiltration planters. A capture and use system would capture stormwater runoff from the roof and surface drains for feeding new landscaped areas around the Project Site, whereas biofiltration planters would use stormwater pumped from storage tanks for irrigation.

In summary, the Project would not conflict with applicable zoning and other regulations governing scenic quality. 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.

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

No Impact. As discussed in the *L.A. CEQA Thresholds Guide*, new light sources introduced by a project may increase ambient nighttime illumination levels. Additionally, nighttime spillover of light onto adjacent properties has the potential to interfere with certain functions, including vision, sleep, privacy, and general enjoyment of the natural nighttime condition. The significance of the impact depends on the type of use affected, proximity to the affected use, the intensity of the light source, and the existing ambient light environment. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and institutional uses, and natural areas.

Construction

While the majority of Project construction would occur during daylight hours, there is a potential that construction could occur in the evening hours and require the use of artificial lighting, particularly during the winter season when daylight is no longer sufficient earlier in the day. Outdoor lighting sources such as floodlights, spot lights, and/or headlights associated with construction equipment and hauling trucks typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of proposed Project construction. Further, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. In addition, construction lighting, while potentially bright, would be highly focused on the particular area undergoing work. Accordingly, uses which are not adjacent to the Project construction site would not be anticipated to be substantially affected by construction lighting.

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

Based on the above, light and glare associated with temporary Project construction would not substantially alter the character of off-site areas surrounding the Project Site or adversely impact day or nighttime views in the area. Moreover, pursuant to SB 743, PRC Section 21099, and Zoning Information File ZI No. 2452, the Project's aesthetics impacts would not be considered significant.

Operation

As discussed above, the Project Site is located within a highly urbanized area of the City. Characteristic of an urban area, nighttime lighting in the Project Site vicinity results from numerous types of artificial light sources, including street lights, automobile lights, signage, residential and commercial building lights, and parking facilities. Existing lighting within the Project Site itself includes low to medium output security lighting, vehicle headlights, surface parking lot lighting, and interior lighting. Glare sources consist of glass and metal vehicle and building surfaces. The existing structures on the Project Site consist largely of flat façades with windows located along building frontages. Thus, the on-site structures themselves generate limited glare.

As previously described, light-sensitive land uses include residential uses as well as some commercial and institutional uses. In the immediate vicinity of the Project Site, the nearest off-site receptors that are considered sensitive relative to light and glare and have views of the Project Site include existing four-story residential building to the north of the Project Site, along Yucca Street. Additionally, motorists traveling along roadways in the Project Site vicinity may be sensitive to daytime glare.

As discussed in Section 3, Project Description, of this Initial Study, the Project would develop 210,769 square feet of office uses and 6,500 square feet of ground floor commercial (restaurant) space. The

Project would increase light and glare levels emanating from the Project Site. The Project would include lighting from within the building's interior, lighting at the building exterior elevations, and lighting from internal driveways and walkways. New sources of exterior lighting that would be introduced by the Project would include: low-level exterior lighting on the building and along pathways for security and wayfinding purposes; low-level lighting to accent signage, architectural features, and landscaping elements; outdoor decorative lights; and interior lighting visible through the windows of the commercial and office uses. Project lighting would be designed to provide for efficient, effective, and aesthetically pleasing lighting solutions that would minimize light trespass from the Project Site and minimize sky-glow to increase night sky access. All exterior lighting would be dimmable and automatically controlled via occupancy sensors and photo sensors to allow for the appropriate control of nighttime lighting. Interior lighting would be dimmable and controlled to meet all prevailing code requirements, which includes the use of occupancy sensors, multi-scene presets, and timeclock events. The Project would not include signs with flashing, mechanical, or strobe lights.

The proposed lighting sources would be similar to other lighting sources in the vicinity of the Project Site and would not generate artificial light levels that are out of character with the surrounding area. All exterior lighting would be shielded and/or directed toward the areas to be lit within the Project Site to avoid light spillover onto adjacent sensitive uses, and would be dark-sky compliant. Project lighting would also comply with regulatory requirements, including the requirements that are set forth by CALGreen and Title 24 that stipulate the use of high performance light with appropriate light and glare control according to Backlight, Uplight, and Glare standards. Pursuant to Section 93.0117(b) of the LAMC, exterior light sources other than signage lighting would be designed so that lighting levels produced do not exceed 2 foot-candles above ambient lighting at the property line of the nearest residential property or light-sensitive receptor. Exterior lighting to highlight the Project's signage would be shielded or directed toward the areas to be lit to avoid creating off-site glare. In accordance with Section 14.4.4E of the LAMC, lighting used to illuminate Project signage would be limited to a light intensity of 3 foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be approved by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties.

Daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. In general, sun reflection that has the greatest potential to interfere with driving occurs from the lower stories of a structure. Sun reflection from the Project would occur during periods in which the sun is low on the horizon and when the point of reflection within the Project Site is in front of the driver, in the direction of travel. The Project would feature a variety of surface materials, including glass and metal. As part of the Project, glass used in building façades would have high-performance coatings that would not be highly reflective, thereby minimizing glare from reflected sunlight.

Nighttime glare could result from illuminated signage and artwork, and from vehicle headlights. As described above, Project illuminated signs would not exceed the prescribed lighting requirements of the LAMC. Furthermore, while headlights from vehicles entering and exiting the parking levels would be visible during the evening and nighttime hours, such lighting sources would be typical for the area. Thus, nighttime glare would not result in a substantial adverse impact.

Based on the above, with adherence to regulatory requirements, lighting associated with Project operation would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Furthermore, light and glare associated with Project operation would not substantially alter the character of off-site areas surrounding the Project Site and would not result in a substantial adverse change in ambient nighttime levels in close proximity to light-sensitive uses. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetic impact would not be considered significant. No further evaluation of this topic in an EIR is required.

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

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

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

No Impact. The Project Site is located in an urbanized area of the City. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with office and commercial uses and associated surface parking areas. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site and surrounding area are also not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.[14] As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The northern 100 feet of the Project Site is zoned C4-2D-SN and the remainder of the Project Site is zoned [Q]C4-2D-SN (Commercial zone, Height District 2 with Development Limitation, Hollywood Signage Supplemental Use District), which permits a wide array of land uses including commercial, office, residential, retail, and hotel uses. The Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area. The Project Site and surrounding area are also not enrolled under a Williamson Act Contract.[15] Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As previously discussed, the Project Site is currently developed with office and commercial uses and associated surface parking areas. The Project Site does not include any forest land or timberland. In addition, the northern 100 feet of the Project Site is currently zoned C4-2D-SN and the remainder of the Project Site is zoned [Q]C4-2D-SN (Commercial zone, Height District 2 with Development Limitation, Hollywood Signage Supplemental Use District). The Project Site is not zoned or used as forest land.[16] Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the PRC. 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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[14] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5546005006, 5546005007, 5546005029.

[15] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5546005006, 5546005007, 5546005029.

[16] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5546005006, 5546005007, 5546005029.

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

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

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

No Impact. As previously discussed above, the Project Site is located in an urbanized area of the City and does not include farmland or forest land. The Project Site and surrounding area are also not mapped as farmland or forest land, are not zoned for farmland/agricultural use or forest land, and do not contain any agricultural or forest uses.[17] As such, the Project would not result in the conversion of farmland to non-agricultural use or in the conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

III. AIR QUALITY

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

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

[17] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5546005006, 5546005007, 5546005029.

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

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (the Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [$PM_{2.5}$], and lead[18]). SCAQMD's 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.[19] With regard to future growth, SCAG has prepared their Regional Transportation Plan/Sustainable Communities Strategy, which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area. As discussed above, the Project would include the demolition of the existing restaurant and vacant buildings totaling 21,413 square feet and development of 217,269 square feet of floor area consisting of approximately 210,769 square feet of office uses and 6,500 square feet of ground floor commercial (restaurant) space. Therefore, 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 SCAQMD's implementation of the AQMP. Therefore, the EIR will provide further analysis of the Project's consistency with SCAQMD's AQMP.

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

Potentially Significant Impact. As discussed above, construction and operation of the Project would result in the emission of air pollutants in the South Coast 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 microns in size (PM_{10}), and $PM_{2.5}$. Therefore, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Basin. The EIR will provide further analysis of cumulative air pollutant emissions associated with the Project.

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

Potentially Significant Impact. As discussed above, the Project could result in increased short- and long-term air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Sensitive receptors located in the vicinity of the Project Site include residential and school uses. Therefore, the Project could expose sensitive receptors to additional pollutant concentrations and

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

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

the EIR will provide further analysis of the Project's potential to result in substantial adverse impacts to sensitive receptors.

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

Less Than Significant Impact. No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not 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 does not propose these uses and consists of office and commercial uses. On-site trash receptacles would also be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

In addition, the construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.[20] In particular, 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.[21]

Based on the above, the Project would not result in other emissions such as those leading to odors. Impacts during construction and operation of the Project would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒

[20] SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed December 16, 2020.

[21] SCAQMD, Rule 402, Nuisance.

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

a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. The Project Site is located in an urbanized area and is currently occupied by office and commercial uses and associated surface parking areas. Landscaping within the Project Site is limited, consisting of four Palm trees and grasses within small planter areas. 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. Thus, based on the lack of habitat on the Project Site, special status species listed by the California Department of Fish and Wildlife (CDFW)[22] or by the U.S. Fish and Wildlife Service (USFWS)[23] would not be anticipated to be present on-site. Furthermore, the Project Site is not located in

[22] CDFW, California Natural Diversity Database, Special Animals List, August 2019.

[23] USFWS, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California,, https://ecos.fws.gov/ecp/report/species-listings-by-state?stateAbbrev=CA&stateName=California&statusCategory=Listed accessed December 16, 2020.

or adjacent to a Biological Resource Area as defined by the City of Los Angeles.[24] 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. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is located in an urbanized area and is currently occupied by office and commercial uses and associated surface parking areas. No riparian or other sensitive natural community exists on the Project Site.[25,26] 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.[27,28] 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.[29,30,31] Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is located in an urbanized area and is currently occupied by office and commercial uses and associated surface parking areas. No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site or in the immediate vicinity.[32] As such, the Project would not have an adverse effect on state or federally protected wetlands. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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24 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.

25 CDFW, Biogeographic Information and Observation System (BIOS https://apps.wildlife.ca.gov/bios/, accessed December 16, 2020.

26 USFWS, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed December 16, 2020.

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

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

29 CDFW, Biogeographic Information and Observation System (BIOS https://apps.wildlife.ca.gov/bios/, accessed December 16, 2020.

30 CDFW, CDFW Lands, https://apps.wildlife.ca.gov/lands, accessed December 16, 2020.

31 USFWS, National Wetlands Inventory, www.fws.gov/wetlands/index.html, accessed December 16, 2020.

32 U.S. Environmental Protection Agency, NEPAssist, https://nepassisttool.epa.gov/nepassist/nepamap.aspx, accessed December 16, 2020.

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

Less Than Significant Impact. As previously discussed, the Project Site is located in an urbanized area and is currently developed with a seven-story office building, a single-story commercial building, and a three-story commercial building and associated surface parking areas. Existing landscaping within the Project Site includes four Palm trees and grasses within small planter areas. 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 that may serve as wildlife corridors. The Project Site is also 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.[33,34] Therefore, the Project Site and surroundings do not include areas that could be used as wildlife corridors.

The Project Site is relatively flat with limited ornamental landscaping. As discussed in the Tree Report prepared for the Project, included in Appendix IS-1 of this Initial Study, there are a total of four non-protected on-site trees within the Project Site and two Ficus street trees along Cahuenga Boulevard, which is a species that is protected by the LAMC. The four on-site trees are not in good health and would be removed as part of the Project. Although unlikely, these trees could potentially provide nesting sites for migratory birds. However, the Project would comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish and Game Code Section 3503 states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." No exceptions are provided in the code and California Department of Fish and Wildlife has never promulgated any regulations interpreting these provisions.

In accordance with the Migratory Bird Treaty Act and California Fish and Game Code, tree removal activities associated with the Project would take place outside of the nesting season (February 1–August 31), 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 impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and is based on the professional judgement of the monitoring biologist, in coordination with the California Department of Fish and Wildlife.

With compliance with the Migratory Bird Treaty Act, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Impacts would be less than

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[33] 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.

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

significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The City 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, there are four non-protected Palm trees located on-site and two Ficus trees, located adjacent to the Project Site along Hollywood Boulevard. As part of the Project, the four existing on-site non-protected trees would be removed to accommodate development of the Project. 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). In accordance with the Department of City Planning's policy, the on-site trees to be removed would be replaced on a 1:1 basis. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is located in an urbanized area and is currently developed with office and commercial uses and associated surface parking areas. As described above, the Project Site does not support any habitat or natural community.[35,36] No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.[37] 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.

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35 CDFW, Biogeographic Information and Observation System (BIOS https://apps.wildlife.ca.gov/bios/, accessed December 16, 2020.

36 USFWS, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed December 16, 2020.

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

V. CULTURAL RESOURCES

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

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

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

As previously discussed, the Project Site is currently developed with the seven-story SPB Building, a single-story commercial building, a three-story commercial building; and surface parking areas. Based on a review of the HistoricPlacesLA database[38] and the Los Angeles ZIMAS database, the SPB Building is individually listed in the National Register and is considered a Los Angeles Historic Cultural Monument. The SPB Building would remain on the Project Site and would continue to be used for office uses. Nevertheless, given the presence of known historical resources on the Project Site, the Project has the potential to indirectly affect historical resources. Therefore, the EIR will provide further analysis of the Project's potential impacts to historical resources.

[38] City of Los Angeles, HistoricPlacesLA, www.historicplacesla.org/map, accessed December 16, 2020.

b. Would the project 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 158,490 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. Would the project disturb any human remains, including those interred outside of dedicated 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.

VI. ENERGY

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

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

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with a seven-story, 67,581-square-foot office building; a single-story, 9,680-square-foot commercial building; a three-story, 12,113-square-foot commercial building; and surface parking areas. The Project includes the development of 210,769 square feet of office uses and 6,500 square feet of ground floor commercial (restaurant) space. The Project would generate an

increased demand for electricity and natural gas services provided by the Los Angeles Department of Water and Power (LADWP) and the Southern California Gas Company, respectively. While development of the Project would not be anticipated to cause wasteful, inefficient, and unnecessary consumption of energy resources, further analysis of the Project's demand on existing energy resources will be provided in the EIR.

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

Potentially Significant Impact. First established in 2002 under Senate Bill (SB) 1078, California's Renewable Portfolio Standard (RPS) required retail sellers of electric services to increase procurement from eligible renewable energy resources to 20 percent of total retail sales by 2017.[39] The program was accelerated in 2015 with SB 350 which mandated a 50 percent RPS by 2030. In 2018, SB 100 was signed into law, which again increases the RPS to 60 percent by 2030 and requires all the state's electricity to come from carbon free resources by 2045. LADWP provides electrical service throughout the City and many areas of the Owens Valley. LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. In accordance with SB 100, LADWP is required to procure at least 60 percent of its energy portfolio from renewable sources by 2030.

Regarding energy efficiency, the California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction, system design, and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2019 Title 24 standards, which became effective on January 1, 2020.[40] The 2019 Title 24 standards include efficiency improvements to the residential standards for attics, walls, water heating, and lighting and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1 2013 national standards.[41]

As previously described, the Project Site is currently developed with commercial and storage buildings and surface parking lots. The Project Site does not include any renewable energy sources used by LADWP. The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. While the Project would not be anticipated to conflict with or obstruct a state or local plan for renewable energy or energy efficiency, the Project's compliance with LADWP's plans for renewable energy, as well as the Project's compliance with California Building Energy Efficiency Standards, will be further evaluated in the EIR.

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39 CPUC, California Renewables Portfolio Standard (RPS), www.cpuc.ca.gov/rps/, accessed December 16, 2020.

40 CEC, 2019 Building Energy Efficiency Standards, www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency/, accessed December 16, 2020.

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

VII. GEOLOGY AND SOILS

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

The following analysis is based on the Geotechnical Engineering Investigation (Geotechnical Investigation) prepared for the Project by Geocon West, Inc., dated October 17, 2019, and an *Update of Geotechnical Investigation* dated May 18, 2021. All specific information on geologic and soils conditions in the discussion below is from the Geotechnical Investigation unless otherwise noted. The Geotechnical Investigation and Update of Geotechnical Investigation memorandum are included as Appendix IS-2 of this Initial Study.

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

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

Potentially 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 City data, the Project Site is not located within a City-designated Fault Rupture Study Area; however, the Project Site is located within an Alquist-Priolo Earthquake Fault Zone.[42] According to the Geotechnical Investigation, the closest active fault to the Project Site is the Hollywood Fault located approximately 230 feet north of the Site. Therefore, further analysis will be provided in the EIR.

ii. Strong seismic ground shaking?

Potentially Significant Impact. The Project Site is located within the seismically active region of Southern California and would potentially be subject to strong ground motion if a moderate to strong earthquake occurs on a local or regional fault. As discussed in the Geotechnical Investigation, the closest active fault near the Project Site is the Hollywood Fault, located approximately 230 feet north of the Project Site. Therefore, further analysis of the potential for the Project to cause in part or in whole strong seismic ground shaking will be provided in the EIR.

[42] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5546005006, 5546005007, 5546005029.

iii. Seismic-related ground failure, including liquefaction?

Potentially 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. Effects of liquefaction can include sand boils, settlement, and bearing capacity failures below structural foundations. Neither the City of Los Angeles or the State of California classifies the Project Site as part of a potentially liquefiable area.[43,44] Nonetheless, given the proximity of the Project Site to a fault, further analysis of the Project's potential to result in seismic-related ground failure will be included in the EIR.

iv. Landslides?

No Impact. Landslides can occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain during precipitation, soil disturbance, changes in groundwater, or seismic activity.[45] The topography of the Project Site is relatively level and the topography in the immediate vicinity slopes gently to the south. However, the Project Site is not located in a landslide area as mapped by the State[46] or the City of Los Angeles.[47,48] In addition, 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. As such, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently fully developed with buildings and surface parking areas. As such, there are no open spaces with exposed topsoil. However, 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. 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, the Project would be required to comply with the City's Low Impact Development (LID) ordinance[49] and implement standard erosion

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43 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5546005006, 5546005007, 5546005029.

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

45 What is a landslide, US Geological Survey, www.usgs.gov/faqs/what-a-landslide-and-what-causes-one/, accessed December 16, 2020.

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

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

48 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5546005006, 5546005007, 5546005029.

49 Ordinance No. 181899.

controls to limit stormwater runoff, which can contribute to 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. Would the project be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Potentially Significant Impact. As discussed above, the Project Site is susceptible to ground shaking. Thus, the potential of the Project to cause in whole or in part a geologic unit to become unstable and potentially result in lateral spreading, subsidence, and collapse will be addressed in the EIR. In addition, as discussed in Checklist Question No. VII(a)(iii), potential liquefaction impacts will also be addressed in the EIR. As discussed above in Response to Checklist Question No. VII(a)(iv) impacts associated with landslides would not occur as part of the Project.

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

Less Than Significant Impact. Expansive soils are typically associated with clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying.[50] As discussed in the Geotechnical Investigation, the Project Site is underlain with granular alluvial deposits, including poorly graded and well-graded sand, silty sands and sand with silt with some localized silt beds ranging from very loose to very dense or firm and dry to saturated.[51] As concluded in the Geotechnical Investigation, based on the depth of the proposed subterranean levels, the Project Site would not be prone to the effects of expansive soils.[52] Therefore, the Project would not exacerbate existing environmental conditions that could create substantial risk to life or property due to expansive soils. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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

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50 ScienceDirect, Expansive Soils, www.sciencedirect.com/topics/engineering/expansive-soil, accessed November 19, 2020.

51 Geotechnical Engineering Investigation, Geocon West, Inc., October 17, 2019, p. 4.

52 Geotechnical Engineering Investigation, Geocon West, Inc., October 17, 2019, p. 13.

f. Would the project 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 up to 82 feet below grade, 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.

VIII. GREENHOUSE GAS EMISSIONS

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

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

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

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

Potentially Significant Impact. As the Project would have the potential to emit greenhouse gases, the EIR will include further evaluation of project-related emissions and associated emission reduction strategies to determine whether the Project conflicts with an applicable plan, policy, or regulation adopted

for the purpose of reducing the emissions of greenhouse gases (e.g., Assembly Bill [AB] 32 and the City of Los Angeles Green Building Code).

IX. HAZARDS AND HAZARDOUS MATERIALS

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

The following analysis is based, in part, on the *Phase I Environmental Site Assessment* (Phase I ESA) prepared for the Project by Advantage Environmental Consultants, LLC, dated September 24, 2019.[53] This report is included as Appendix IS-3 of this Initial Study.

[53] It should be noted that the existing buildings on the Project Site described in the Phase I ESA were consistent with the existing buildings at the time the Phase I ESA was prepared. Subsequently, one of the buildings has been vacated.

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

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

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in office and commercial uses, including cleaning products, paints, and those used for maintenance of landscaping. Such use would be consistent with that currently occurring at other nearby developments. In addition, as with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with all applicable federal, state and local requirements. Due to the type of development proposed (e.g., office and commercial uses), operation of the Project would not involve the routine transport of hazardous materials to and from the Project Site. Therefore, with implementation of appropriate hazardous materials management protocols at the Project Site and compliance with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during operation of the Project would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. The current and past land uses within the Project Site were identified as part of the Phase I ESA to assess their potential to present concerns relative to the presence of hazards and/or the handling of hazardous materials. These concerns are classified as Recognized Environmental Conditions (RECs), which are defined in Section 1.1.1 of the ASTM Standard Practice as the presence or

likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, past release, or material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property.

As discussed in the Phase I ESA, the Project Site had been partially developed since at least 1907. The Phase I ESA identified a historic use in the northwest portion of the 1720 N. Cahuenga Boulevard portion of the Project Site as a dry cleaning facility in the 1930s to 1940s as a recognized environmental concern. Other past uses included multiple healthcare related offices which likely used or generated hazardous materials and waste, the possible presence of a former gasoline station in the southwest corner of the Project Site (6381 Hollywood), the presence of light ballasts that may contain polychlorinated biphenyls and the Project Site listings on the HAZNET database for the generation of photo processing chemicals. The Phase I ESA also noted that the existing seven-story (6381 Hollywood) building in the southern portion of the Project Site (located in the area of the possible former gasoline station) includes a 15-foot basement. Due to the basement, the Phase I ESA concluded the presence of USTs at the Project Site was considered unlikely.

As discussed in the Phase I ESA, a Soil Vapor Intrusion Investigation previously conducted for the Project Site encountered concentrations of tetrachloroethylene (PCE), ethylbenzene and xylenes. As concluded in the Phase I ESA, none of the detected volatile organic compounds (VOC) concentrations were noted as being elevated above applicable screening levels at the time of the assessment; however, since the time the soil vapor samples were obtained in 2007, human health risk based screening levels pertaining to VOCs in soil vapor have changed and become substantially more conservative. Based on the updated risk based screening levels, some of the detected PCE and ethylbenzene concentrations reported in 2007 would now be considered to be elevated above current residential and/or commercial screening levels. Regardless, because the majority of the Project Site is to be excavated to facilitate construction of a subterranean parking garage (including in the area of the reported former cleaners), the historical reporting of what are still considered to be relatively low levels of VOCs in soil vapor at the Project Site is not considered to be of significant environmental concern relative to the current and anticipated future land use of the Project Site.

As concluded in the Phase I ESA, there are no RECs or Controlled Recognized Environmental Conditions (CRECs). The Phase I ESA revealed that the former presence of a reported gasoline station (southwestern area of the Project Site in the existing basement area of 6381 Hollywood Boulevard) and a reported dry-cleaning business (northwest portion of the 1720 N. Cahuenga Boulevard portion of the Project Site) are considered to be historical recognized environmental conditions that do not require additional evaluation. Nevertheless, a summary of the findings of the Phase I ESA as well as an evaluation of other potential hazardous materials that may be present on the Project Site during construction and operation of the Project is provided below.

Construction

Hazardous Waste Generation, Handling, and Disposal

During demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, could be used, and therefore, would require proper handling and management and, in

some cases, disposal. The use, handling, storage, and disposal of these materials could increase the opportunity for hazardous materials releases and, subsequently, the exposure of people and the environment to hazardous materials. However, as previously discussed, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the Project would comply with all applicable federal, State, and local requirements concerning the use, storage, and management of hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of potentially hazardous materials used during construction.

As discussed above, while the soil vapor monitoring conducted at the Project Site did encounter concentrations of PCE, ethylbenzene and xylenes, as concluded in the Phase I ESA, none of the detected VOC concentrations were noted as being elevated above applicable screening levels at the time of the assessment. In addition, while some of the detected PCE and ethylbenzene concentrations reported in 2007 would now be considered to be elevated above current residential and/or commercial screening levels, because the majority of the Project Site is to be excavated to facilitate construction of the subterranean parking garage (including in the area of the reported former cleaners), the historical reporting of what are still considered to be relatively low levels of VOCs in soil vapor at the Project Site is not considered to be of significant environmental concern relative to the current and anticipated future land uses of the Project Site. Nevertheless, in the event that contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166.[54] Specifically, SCAQMD Rule 1166 requires that an approved mitigation plan be obtained from SCAQMD prior to commencing any of the following activities: the excavation of an underground storage tank or piping which has stored VOCs; the excavation or grading of soil containing VOC material including gasoline, diesel, crude oil, lubricant, waste oil, adhesive, paint, stain, solvent, resin, monomer, and/or any other material containing VOCs; the handling or storage of VOC-contaminated soil [soil which registers >50 parts per million (ppm) or greater using an organic vapor analyzer (OVA) calibrated with hexane] at or from an excavation or grading site; or the treatment of VOC-contaminated soil at a facility. SCAQMD Rule 1166 further requires that a copy of the approved mitigation plan be on site during the entire excavation period and that the SCAQMD executive officer be notified at least 24 hours prior to excavation. In accordance with SCAQMD Rule 1166, monitoring for VOC contamination would occur at least once every 15 minutes and VOC concentration readings would be recorded. When VOC-contaminated soil is detected, the approved mitigation plan would be implemented. Therefore, compliance with existing regulations would ensure the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the handling and disposal of contaminated soil that may be encountered on-site.

Based on the above, construction of the Project would not 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. Impacts associated with hazardous waste generation,

[54] SCAQMD. Rules and Compliance, Rule 1166.

handling, and disposal during construction would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Underground and Aboveground Storage Tanks

According to the Phase I ESA, no evidence of existing Underground Storage Tanks (USTs) was observed on the Project Site. No other records were found that indicate the presence of USTs within the areas proposed for construction. A 50-gallon Aboveground Storage Tank (AST) containing diesel fuel was observed in the basement of the 6381 Hollywood Boulevard building; however, the AST was properly labeled, and no suspect conditions were noted. In the unlikely event that USTs are found, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. Specifically, if underground storage tanks are encountered, prior to removal, applicable permits would be obtained from the LAFD. Therefore, with compliance with applicable regulations, the Project would not 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. Impacts related to the potential removal of USTs during construction would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Asbestos-Containing Materials

Asbestos was widely used in the building industry starting in the late 1800s and up until the late 1970s for a variety of uses, including acoustic and thermal insulation and fireproofing, and is often found in ceiling and floor tiles, linoleum, pipes, structural beams, and asphalt. Any building, structure, surface asphalt driveway, or parking lot constructed prior to 1979 could contain asbestos or ACMs. Based on the age of the on-site buildings (i.e., constructed as early as 1907), asbestos-containing materials (ACMs) may be present on-site. Thus, in accordance with SCAQMD Rule 1403, the Project Applicant would be required to conduct a comprehensive asbestos survey prior to demolition, subject to approval by LADBS. In the event that ACMs are found within areas proposed for demolition, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable regulations. With compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment. Therefore, with compliance with applicable regulations, the Project would not 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. Impacts related to the removal of ACMs during demolition would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Lead-Based Paint

Lead is a naturally occurring element and heavy metal that was widely used as a major ingredient in most interior and exterior oil-based paints prior to 1950. Lead compounds continued to be used as corrosion inhibitors, pigments, and drying agents from the early 1950s to 1972, when the Consumer Products Safety Commission specified limits on lead content in such products. As discussed above, lead-based paints (LBP) was found on both the 6381 Hollywood Boulevard and 1716 North Cahuenga Boulevard buildings. Therefore, suspect materials would be removed in accordance with procedural requirements and regulations for the proper removal and disposal of LBP prior to demolition activities, including standard handling and disposal practices pursuant to OSHA regulations. Example procedural requirements include the use of respiratory protection devices while handling lead-containing materials,

containment of lead or materials containing lead on the Project Site or at locations where construction activities are performed, and certification of all consultants and contractors conducting activities involving LBP or lead hazards. With compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of LBP into the environment. Therefore, with compliance with applicable regulations, the Project would not 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. Impacts related to the removal of LBP during demolition would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Polychlorinated Biphenyls

Typical sources of polychlorinated biphenyls (PCBs) include electrical transformer cooling oils, fluorescent light fixture ballasts, and hydraulic oil. In 1976, the USEPA banned the manufacture and sale of PCB-containing transformers. As discussed above, light fixture ballasts were observed on-site. In the event that PCBs are found within areas proposed for demolition, suspect materials would be removed in accordance with all applicable federal, State, and local regulations. Therefore, with compliance with applicable regulations, the Project would not 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. Impacts related to the removal of PCBs during demolition would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Oil Wells and Methane

The Project Site is not located within any oil or gas field, and no oil or natural gas wells were located on the Project Site. The Project Site is also not found to be located within a designated Methane Zone or Methane Buffer Zone mapped by the City.

Operation

Hazardous Waste Generation, Handling, and Disposal

As discussed above, while the soil vapor monitoring conducted at the Project Site encountered concentrations of PCE, ethylbenzene and xylenes, the historical reporting of what are still considered to be relatively low levels of VOCs in soil vapor at the Project Site is not considered to be of significant environmental concern relative to the current and anticipated future land use of the Project Site.

In addition, operation of the Project Site would involve the routine use of small quantities of potentially hazardous materials typical of those used in office and commercial uses. As stated previously, activities involving the handling and disposal of hazardous wastes would occur in compliance with all applicable federal, state, and local requirements concerning the handling and disposal of hazardous waste. Therefore, with compliance with applicable regulations and requirements, operational activities would not 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. Impacts associated with hazardous waste generation, handling, and disposal during 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.

Underground and Aboveground Storage Tanks

The Project does not propose the installation of USTs or ASTs. As such, operation of the Project would not 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. Impacts associated with underground and aboveground storage tanks during 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.

Asbestos-Containing Materials

Development of the Project would include the use of commercially-sold construction materials that would not include asbestos or ACMs. Project operation is, therefore, not anticipated to increase the occurrence of friable asbestos or ACMs at the Project Site. Therefore, operation of the Project would not 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. No impacts associated with asbestos or ACMs during operation of the Project would occur, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Lead-Based Paint

Development of the Project would include the use of commercially-sold construction materials that would not include LBP. Project operation is, therefore, not anticipated to increase the occurrence of LBP at the Project Site. Operation of the Project would not expose people to LBP as no LBPs would be used. Thus, the Project would not 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. Impacts associated with LBP during operation of the Project would not occur, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Polychlorinated Biphenyls

In accordance with existing regulations which ban the manufacture of PCBs, the new electrical systems to be installed as part of the Project would not contain PCBs. Therefore, during operation of the Project, maintenance of such electrical systems would not expose people to PCBs and operation of the Project would not expose people to any risk resulting from the release of PCBs in the environment. Therefore, the Project would not 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. No impacts related to PCBs during Project operation would occur, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Oil Wells and Methane Gas

The Project does not include the installation of oil wells. As such, operation of the Project would not 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. No impacts associated with oil wells during operation would occur, and no mitigation measures are required. The Project Site is also not within a Methane Zone or Methane Buffer Zone identified by the City. Therefore,

there is a negligible risk of subsurface methane release. No further analysis of these topics in an EIR is required.

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

Less Than Significant Impact. There are no schools located within a 0.25-mile radius of the Project Site. The nearest school is The Los Angeles Film Schools located approximately 0.4 mile south of the Project Site. 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 office and commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed office and commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used in the vicinity of the Project Site. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations including, but not limited to, federal and State Occupational Safety and Health Act requirements. As such, the use of such materials would not create a significant hazard to nearby schools. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Section 65962.5 of the California Government Code requires the California Environmental Protection Agency to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While Section 65962.5 makes reference to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of multiple agencies. The Phase I ESA for the Project Site obtained a database search report from EDR of Shelton Connecticut, dated August 29, 2019, which is included in Section 11.4 of the Phase I ESA. The report documents findings of various federal, state, and local regulatory database searches regarding properties with known or suspected releases of hazardous materials or petroleum hydrocarbons. Based on the databases records search, the Project Site was listed on the HAZNET non-ASTM database as Scarlet Letters at 6381 Hollywood Boulevard. The listing refers to the generation of hazardous wastes in the form of photo processing chemicals. None of the database listings for the Project Site are indicative of releases of hazardous substances or petroleum products. Therefore, impacts regarding this threshold would be less than significant, and no mitigation measures are required. No further analysis 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 or excessive noise 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 7.4 miles from the Project Site. Given the distance between the Project Site and the nearest airport, 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. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. According to the City's General Plan Safety Element, the nearest disaster routes to the Project Site are the US-101 and Santa Monica Boulevard, which are all accessible within 1 mile of the Project Site.[55] While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. 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.

Operation of the Project would generate traffic in the vicinity of the Project Site and would result in some modifications to site access. However, the Project would comply with the Los Angeles Fire Department (LAFD) access requirements and would not impede emergency access in the vicinity of the Project Site. Furthermore, the Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan. Impacts related to the implementation of the City's emergency response plan would be less than significant, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

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

Less Than Significant Impact. There are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone.[56] Therefore, the Project would not exacerbate conditions that would subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. Specifically, Section 57.106.5.2 of the LAMC provides that the Fire Chief has the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; Section 57.118 of the LAMC establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects; and Section 57.507.3.1 establishes fire water flow standards. Additionally, the proposed uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Impacts would be less than

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

[56] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5546005006, 5546005007, 5546005029. 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.

significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

X. HYDROLOGY AND WATER QUALITY

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

The following analysis is based, in part, on the *Hydrology and Water Resources Technical Report* (Hydrology Report) prepared for the Project by KPFF Consulting Engineers, dated June 2, 2021, and included as Appendix 4 of this Initial Study.

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

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

Surface Water Quality

Construction

During Project construction, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. However, as Project construction would disturb more than 1 acre of soil, the Project would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. In accordance with the requirements of the NPDES Construction General Permit, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) adhering to the California Stormwater Quality Association BMP Handbook. The SWPPP would set forth Best Management Practices (BMPs) to be used during construction 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. 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.

As previously discussed, the Project would include excavation of the Project Site to a depth of approximately 82 feet. As provided in the Geotechnical Investigation included as Appendix IS-2 of this Initial Study, the historic high groundwater level was on the order of 80 feet below grade. Therefore, Project construction activities could encounter groundwater and dewatering may be required. Dewatering operations are practices that discharge non-stormwater, such as groundwater, that must be removed from a work location into a drainage system to proceed with construction. Discharges from dewatering operations can contain high levels of fine sediments, which, if not properly treated, could lead to exceedance of the NPDES requirements. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with the NPDES permit. The temporary system would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations. Furthermore, if dewatering is required, the treatment and disposal of the dewatered water would occur in accordance with the requirements of the Los Angeles Regional Water Quality Control Board's (LARWQCB) Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.

With the implementation of site-specific BMPs included as a part of the SWPPP and implementation of an erosion control plan as required by the LAMC, the Project would reduce or eliminate the discharge of potential pollutants from stormwater runoff. Therefore, with compliance with NPDES requirements and City of Los Angeles grading permit regulations, construction of the Project would not result in discharges that would violate any surface water quality standard or waste discharge requirements. Thus, temporary construction-related impacts on surface water quality would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

Operation of the Project would introduce sources of potential stormwater pollution that are typical of office and commercial uses (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with vehicular circulation areas). Stormwater runoff from precipitation events could potentially carry urban pollutants into municipal storm drains. Anticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. Under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the 85th percentile storm event. As discussed in the Geotechnical Investigation, infiltration is considered technically feasible since it is unlikely groundwater levels will exceed the historic high of 80 feet below ground surface. If infiltration is deemed feasible, then, consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of capture and use or biofiltration planter BMPs as established by the LID Manual. As the majority of potential contaminants are anticipated to be contained within the "first flush" 85th percentile storm event, major storms are not anticipated to cause an exceedance of regulatory standards. The implementation of BMPs required by the City's LID Ordinance would target the pollutants that could potentially be carried in stormwater runoff. Therefore, with the incorporation of LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. Impacts to surface water quality during operation of the Project would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Groundwater Quality

Construction

As provided in the Geotechnical Investigation included as Appendix IS-2 of this Initial Study, the historic high groundwater level on the Project Site was on the order of 80 feet below grade. As previously discussed, development of the Project would include excavations to a maximum depth of 82 feet below ground surface. Therefore, Project construction activities could encounter groundwater and dewatering may be required. Dewatering operations are practices that discharge non-stormwater, such as groundwater, that must be removed from a work location into a drainage system to proceed with construction. Discharges from dewatering operations can contain high levels of fine sediments, which if not properly treated, could lead to exceedance of the NPDES requirements. In the event dewatering is required during Project construction, a temporary dewatering system would be installed and operated in accordance with NPDES requirements. Any discharge of groundwater during construction of the Project would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. Pursuant to such requirements, the groundwater extracted would be chemically analyzed to determine the appropriate treatment and/or disposal methods. As such, groundwater quality would not be impacted from these potential dewatering activities.

Other potential effects to groundwater quality could result from the presence of an underground storage tank or during the removal of an underground storage tank. While no UST or USTs are anticipated to be present within the Project Site, in the unlikely event that USTs are found, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. For example, if underground storage tanks are encountered, prior to removal, applicable permits would be obtained from

the LAFD to ensure handling and removal in accordance with applicable standards. Therefore, USTs would not pose a significant hazard on groundwater quality.

There are also risks associated with contaminated soil impacting groundwater quality. In the event contaminated soils are encountered during construction, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166. In addition, while unlikely, if any previously abandoned and unknown oil wells are located on the Project Site, the wells would be unearthed and inspected by the Geologic Energy Management Division (previously known as the Division of Oil, Gas, and Geothermal Resources) to assess and prescribe abandonment procedures based on their observed condition. Therefore, compliance with existing regulations would ensure the Project would not create a significant hazard to groundwater quality associated with potentially contaminated soil or oil wells.

During on-site grading and building construction, hazardous materials, such as fuels, oils, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the potential for hazardous materials to be released into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste, would reduce the potential for the construction of the Project to release contaminants into groundwater. In addition, as discussed in the Hydrology Report, though there are groundwater production wells or public water supply wells within 1 mile of the Project Site, compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste, as well as implementation of BMPs discussed above, would ensure that construction activities would not affect existing wells. Based on the above, construction of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements. Therefore, construction-related impacts on groundwater quality would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

The Project does not include the installation or operation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility.

Operational activities that could affect groundwater quality include spills of hazardous materials and leaking underground storage tanks. Surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner, thereby resulting in little threat to groundwater. Other types of risks such as leaking underground storage tanks have a greater potential to affect groundwater. No USTs that would have the potential to expose groundwater to contaminants are currently operated or will be installed as part of the Project. In addition, the Project would comply with all applicable existing regulations that would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Therefore, operation of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements. The Project's potential impact on groundwater quality during operation would be less than

significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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

Construction

As provided in the Hydrology Report, though there are groundwater production wells or public water supply wells within 1 mile of the Project Site, compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste as well as implementation of BMPs discussed above would ensure that construction activities would not affect existing wells.

As provided in the Geotechnical Investigation included as Appendix IS-2 of this Initial Study, the historic high groundwater level on the Project Site was on the order of 80 feet below grade. As previously discussed, development of the Project would include excavations to a maximum depth of 82 feet below ground surface. Therefore, Project construction activities could encounter groundwater and dewatering may be required. However, due to the limited and temporary nature of temporary dewatering operations, impacts to groundwater supplies and management of the basin are not considered to be significant. Furthermore, the Project Site is 100 percent impervious under existing conditions and no material groundwater recharge occurs on-site. Therefore, construction of the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts on groundwater supplies during construction of the Project would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

As previously discussed, the Project Site is currently comprised of approximately 100 percent impervious surfaces. While the Project would provide additional landscaping throughout the Project Site, the amount of impervious surface area on the Project Site has been assumed to remain at approximately 100 percent. Accordingly, there is no incremental increase or decrease in the imperviousness of the Project Site that would substantially increase runoff volumes into the existing storm drain system. Furthermore, the Project's BMPs will control stormwater runoff with no increase in runoff resulting from the Project. Also, the Project would not include the installation of water supply wells. Therefore, the Project would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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

Less Than Significant Impact. The Project Site is not crossed by any water courses or rivers. Construction activities for the Project would include demolition of the existing restaurant and vacant buildings and hardscape and the excavation and removal of soil. These activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as discussed above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. These BMPs are designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. In addition, Project construction activities would occur in accordance with City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, through compliance with all NPDES General Construction Permit requirements, including preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. As such, construction-related impacts to hydrology would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

As previously discussed, the Project Site is currently comprised of approximately 100 percent impervious surfaces under existing conditions. At buildout of the Project, the Project Site would be comprised of approximately 100 percent impervious areas. Accordingly, there is no incremental increase or decrease in the imperviousness of the Project Site. 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. Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion or siltation on-site or off-site would occur. Operational impacts to hydrology would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. There are no streams or rivers that cross the Project Site. As previously discussed, construction activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. As discussed above in Response to Checklist Question X.a, the Project would implement a SWPPP that specifies BMPs and erosion control measures used during construction to manage runoff flows. These BMPs are designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. In addition, Project construction activities would occur in accordance with City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, through

compliance with all NPDES General Construction Permit requirements and compliance with applicable City grading permit regulations, construction activities for the Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. As such, construction-related impacts to hydrology would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

As previously discussed, the Project Site is currently comprised of approximately 100-percent impervious surfaces under existing conditions. At buildout of the Project, the Project Site would be comprised of approximately 100 percent impervious areas. Accordingly, there is no incremental increase or decrease in the imperviousness of the Project Site. In addition, as the Project Site currently does not have BMPs for the management of pollutants or runoff, the Project BMPs would control stormwater runoff and ultimately result in a minor decrease in runoff compared to existing conditions. Consequently, the Project would decrease the amount of stormwater runoff discharging into the existing storm drainage infrastructure. As such, the Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on-site or off-site. Operational impacts to hydrology would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed above, the Project would not involve an increase or decrease in the imperviousness of the Project Site. In addition, as the Project Site currently does not have BMPs for the management of pollutants or runoff, the Project BMPs would control stormwater runoff and could ultimately result in a minor decrease in runoff compared to existing conditions. In addition, the implementation of BMPs required by the City's LID Ordinance would target the pollutants that could potentially be carried in stormwater runoff. Therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iv. impede or redirect flood flows?

No Impact. The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles.[57,58] Thus, the Project would not impede or redirect flood flows. No impacts would occur, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed above, the Project Site is not located within a 100-year flood hazard area as mapped by FEMA or by the City of Los Angeles. In addition, the Safety Element of

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[57] Federal Emergency Management Agency, Flood Insurance Rate Maps, Panel Numbers 06037C1605F, effective September 26, 2008.

[58] Los Angeles General Plan Safety Element, November 1996, Exhibit F, 100-Year & 500-Year Flood Plains, p. 57.

the City of Los Angeles General Plan does not map the Project Site as being located within a tsunami hazard area. Therefore, no tsunami or tsunami events would be expected to impact the Project Site. Additionally, there are no standing bodies of water near the Project Site that may experience a seiche.

Earthquake-induced flooding can result from the failure of dams or other water-retaining structures resulting from earthquakes. According to the General Plan's Safety Element, the Project Site is not located within a flood impact zone.[59] However, the Project Site is mapped within an inundation area for the Hollywood Reservoir, which is held by the Mulholland Dam.[60] The Mulholland Dam is a LADWP dam located in the Hollywood Hills. The Mulholland Dam was built in 1924 and designed to hold 2.5 billion gallons of water. Dam safety regulations are the primary means of reducing damage or injury due to inundation occurring from dam failure. The Mulholland 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. Specifically, the California Division of Safety of Dams regulates the siting, design, construction, and periodic review of all dams in the State. In addition, LADWP operates the dams in in the Project Site area and mitigates the potential for over flow and seiche hazard through control of water levels and dam wall height. These measures include seismic retrofits and other related dam improvements completed under the requirements of the 1972 State Dam Safety Act. The City's Local Hazard Mitigation Plan, which was adopted in July 2011, provides a list of existing programs, proposed activities and specific projects that may assist the City in reducing risk and preventing loss of life and property damage from natural and human-cause hazards including dam failure. The Hazard Mitigation Plan evaluation of dam failure vulnerability classifies dam failure as a moderate risk. Given the oversight by the Division of Safety of Dams, including regular inspections, and the LADWP's emergency response program, the potential for substantial adverse impacts related to inundation at the Project Site as a result of dam failure would be less than significant.

Additionally, as discussed above, the Project would include new structural BMPs throughout the Project Site which would reduce the amount of pollutants entering the stormwater system and groundwater. Therefore, in the unlikely event of inundation of the Project Site, the Project would not result in a discharge of pollutants. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Under Section 303(d) of the Clean Water Act, states are required to identify water bodies that do not meet their water quality standards. Biennially, the Los Angeles Regional Water Quality Control Board (LARWQCB) prepares a list of impaired waterbodies in the region, referred to as the 303(d) list. The 303(d) list outlines the impaired waterbody and the specific pollutant(s) for which it is impaired. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL). As discussed in the Hydrology Report, the Project Site is located within the Ballona Creek Watershed in the Los Angeles Basin. According to the State Water Resources Control Board (SWRCB), constituents of concern listed for the Ballona Creek Watershed under California's Clean Water Act Section

[59] Los Angeles General Plan Safety Element, November 1996, Exhibit G, Inundation & Tsunami Hazard Areas, p. 59.

[60] Los Angeles General Plan Safety Element, November 1996, Exhibit G, Inundation & Tsunami Hazard Areas, p. 59.

303(d) List include cadmium (sediment), chlordane (tissue and sediment), copper (dissolved), cyanide, lead, PCBs, silver, toxicity, trash, viruses (enteric), and zinc.

The County of Los Angeles, the City of Los Angeles, and all other cities in the Los Angeles Watershed are responsible for the implementation of watershed improvement plans or Enhanced Watershed Management Programs (EWMP) to improve water quality and assist in meeting the TMDL milestones. The objective of the EWMP Plan for the Ballona Creek is to determine the network of control measures (often referred to as best management practices) that will achieve required pollutant reductions while also providing multiple benefits to the community and leveraging sustainable green infrastructure practices.

Potential pollutants generated by the Project would be typical of office and commercial uses and may include sediment, nutrients, pesticides, trash and debris, oil and grease, and metals. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Since the existing Project Site does not have any structural or LID BMPs to treat or infiltrate stormwater, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. As such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans for the Ballona Creek Watershed. With compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XI. LAND USE AND PLANNING

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

a. Would the project physically divide an established community?

Less than Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with the seven-story SPB Building, a single-story commercial building, and a three-story commercial building, and associated surface parking areas. The Project Site is bounded by commercial buildings and uses to the north, commercial buildings to the east, Hollywood Boulevard to the south, and Cahuenga Boulevard to the west. Land uses located adjacent to the Project Site include a vehicle rental facility and a four-story residential building to the north; a single-story

commercial building and an ancillary surface parking lot to the east; a two-story commercial building to the south; and two-story commercial and office buildings and ancillary surface parking to the west.

The Project would demolish the existing restaurant and vacant buildings totaling approximately 21,413 square feet to accommodate the development of 217,269 square feet of floor area consisting of approximately 210,769 square feet of office uses and 6,500 square feet of ground floor commercial (restaurant) space. All proposed development would occur within the boundaries of the Project Site as it currently exists, and the Project would not require the vacation of any surrounding streets adjacent to the Project Site. Existing transportation infrastructure (e.g., transit routes and stops, streets and highways, and pedestrian and bicycle facilities) would not be altered as a result of the Project. In addition, the Project does not propose a freeway or other large infrastructure that would divide the existing surrounding community. Furthermore, traffic circulation would remain the same upon operation of the Project. Specifically, existing vehicular access to the Project Site would continue to be provided through Cahuenga Boulevard and would be provided via two, two-way driveways that would provide access to the building's ground-level, second-level, and subterranean parking. Therefore, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project requires several discretionary approvals. The Project could potentially conflict with land use plans, policies or regulations that were adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, further evaluation of this topic in an EIR is required.

XII. MINERAL RESOURCES

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

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

No Impact. No mineral extraction operations currently occur on the Project Site. 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.[61,62,63] The Project Site is also not located within a City-designated oil field or oil drilling area.[64] 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. Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. As discussed above, 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.[65,66,67] 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 the EIR is required.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐

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

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

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

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

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

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

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

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

Potentially Significant Impact. During construction activities associated with the Project, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate noise on a short-term basis. In addition, noise levels from on-site sources may increase during operation of the Project. Furthermore, traffic attributable to the Project has the potential to increase noise levels along adjacent roadways. Therefore, further evaluation of this topic will be provided in the EIR.

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

Potentially Significant Impact. Construction of the Project could generate groundborne noise and vibration associated with demolition, site grading and excavation up to 82 feet below grade, other clearing activities, the installation of building footings, and construction truck travel. As such, the Project would have the potential to generate excessive groundborne vibration and noise levels during short-term construction activities. Therefore, further evaluation of this topic will be provided in the EIR.

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The Project Site is not located within the vicinity of a private airstrip, an airport land use plan, or within 2 miles of an airport. The closest airport to the Project Site is Bob Hope Airport, located approximately 7.1 miles north of the Project Site. As such, the Project would not expose people residing or working 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.

XIV. POPULATION AND HOUSING

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

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

Less than Significant Impact. The Project would develop 217,269 square feet of floor area consisting of approximately 210,769 square feet of office uses and 6,500 square feet of ground floor commercial (restaurant) space. Since the Project does not propose a housing component, it would not directly induce a new residential population that would contribute to population growth in the vicinity of the Project Site.

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.

As previously discussed, the Project would develop 217,269 square feet of floor area consisting of approximately 210,769 square feet of office uses and 6,500 square feet of ground floor commercial (restaurant) space. Based on employee generation factors from the City of Los Angeles Department of Transportation (LADOT)'s Vehicle Miles Traveled Calculator,[68] the Project's net increase in floor area of 195,856 square feet would generate approximately 832 employees. As noted above, the Project would not introduce new homes at the Project Site and would therefore not result in a direct population growth in the area. While some of the new employment positions could be filled by persons who would relocate to the vicinity of the Project Site, this potential increase in population would not be substantial since not all employees would move close to the Project Site. Specifically, some employment opportunities may be

[68] Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the employee generation rate 0.004 employee per square foot for "High-Turnover Sit-Down Restaurant" land use is applied to the 6,500 square feet of restaurant space and the rate 0.004 employee per square foot for "General Office" land use is applied to the 210,769 square feet of office uses..

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. According to the 2020–2045 RTP/SCS RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2020 is approximately 1,887,969 employees.[69] In 2026, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,947,472 employees.[70] The Project's net 832 estimated employees would constitute approximately 1.40 percent of the employment growth forecasted between 2020 and 2026.

Overall, the provision of new jobs would constitute a small percentage of employment growth and would not be considered "unplanned growth" and would not produce such a high quantity of new jobs that it would have the possibility to induce unplanned residential growth. Therefore, the Project would not cause an exceedance of SCAG's employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities. As such, given that the Project would not directly contribute to substantial unplanned 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. Further, as the Project would be located in a highly developed area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth.

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

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

No Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with the seven-story SPB Building, a single-story commercial building, a three-story commercial building, and surface parking areas. 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.

XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the

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69 Based on a linear interpolation of 2016–2045 data. The 2020 extrapolated value is calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to 2020: ((2,135,900 – 1,848,300) ÷ 29)*4) + 1,848,300 = 1,887,969.

70 Based on a linear interpolation of 2016–2045 data. The 2026 extrapolated value is calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to 2026: ((2,135,900 – 1,848,300) ÷ 29)*10) +1,848,300 = 1,947,472.

construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

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

a. 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 and would introduce new office and commercial uses, which could result in the need for additional fire protection services. Therefore, further analysis of this issue will be included in the EIR.

b. Police protection?

Potentially Significant Impact. Police protection for the Project Site is provided by the City of Los Angeles Police Department. The Project would introduce new office and commercial uses to the Project Site, which could result in the need for additional police protection services. 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 LAUSD. LAUSD is divided into six local districts.[71] The Project Site is located in Local District–West.[72] 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, pursuant to SB 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(h), the payment of these fees fully removes all Project-related school impacts. Therefore, payment of the applicable development school fees to the LAUSD would offset the potential impact of additional student enrollment at schools serving the Project Site.

[71] LAUSD, Board of Education Districts Maps 2015-2016, http://achieve.lausd.net/Page/8652, accessed December 16, 2020.

[72] LAUSD, Board of Education Local District—West Map, July 2015.

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 (DRP). Nearby parks and recreational facilities within an approximate 2-mile radius of the Project Site include: Selma Park (located 0.25 mile southwest of the Project Site); Yucca Park and Community Center (located 0.36 mile northwest of the Project Site); Las Palmas Senior Citizen Center (located 0.41 mile northwest of the Project Site); De Longpre Park (located 0.56 mile southwest of the Project Site); Carlton Way Park (located 0.61 mile east of the Project Site); Hollywood Recreation Center and Pool (located 0.71 mile south of the Project Site); Dorothy and Benjamin Smith Park (located 0.74 mile northwest of the Project Site); Seily Rodriguez Park (located 1.09 miles southeast of the Project Site); Runyon Canyon Park and Dog Park (1.14 miles northwest of the Project Site); La Mirada Park (located 1.40 miles southeast of the Project Site); Wattles Mansion and Gardens and Park (located 1.46 miles northwest of the Project Site); Poinsettia Recreation Center (located 1.55 miles southwest of the Project Site); Lake Hollywood Park (located 1.73 miles north of the Project Site); Lemon Grove Recreation Center (located 1.82 miles southeast of the Project Site); and Burns (Robert L.) Park (located 1.98 miles southeast of the Project Site).[73]

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create a demand for parks. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks. In addition, Project employees would be more likely to use parks near their homes during non-work hours. Furthermore, the Project proposes on-site open space amenities, including an amenity deck, a large terrace, and various walkways and seating areas on the ground floor for use by building tenants, 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 provided to the Project Site include library services. 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

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[73] DRP, Facility Map Locator, www.laparks.org/maplocator?cat_id=All&geo%5Bradius%5D=2&geo%5Blatitude%5D=34.1021775&geo%5Blongitude%5D=-118.3295611&address=1716%20Cahuenga%20Blvd%2C%20Los%20Angeles%2C%20CA%2090028%2C%20USA&page=1, accessed December 16, 2020.

Web-based resources.[74] The Project area is served by existing LAPL facilities within the Hollywood Community Plan Area, including the Frances Howard Goldwyn–Hollywood Regional Library located 0.2 mile southwest 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 local LAPL facilities. 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, impacts on library facilities would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
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 discussed above, there are numerous public parks and recreational facilities within 2 miles of the Project Site. The closest major park to the Project Site is Selma Park, located approximately 0.25 mile southwest of the Project Site, and includes a children's play area, benches, and outdoor tables.[75] As previously described, the Project does not propose the development of residential uses. While it is possible that some of the Project's new employees may utilize local parks and recreational facilities, this increased demand would be negligible due to the amount of time it would take

[74] Los Angeles Public Library, Library Directory.

[75] DRP, Facility Map Locator, www.laparks.org/maplocator?cat_id=All&geo%5Bradius%5D=2&geo%5Blatitude%5D=34.1021775&geo%5Blongitude%5D=-118.3295611&address=1716%20Cahuenga%20Blvd%2C%20Los%20Angeles%2C%20CA%2090028%2C%20USA&page=1, accessed December 16, 2020.

for employees to access off-site local parks and recreational facilities. Furthermore, 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, 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. Thus, impacts would be less than significant, and no mitigation measures are required. No further analysis of this issue 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?

Less Than Significant Impact. The Project would not include the construction of recreational facilities or require the expansion of recreational facilities, as discussed above in Response Checklist Question XV.d. Thus, impacts would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

XVII. TRANSPORTATION

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

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

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

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

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

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

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

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

No Impact. The Project's design does not include hazardous geometric 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 office and commercial uses would be consistent with other commercial uses surrounding the Project Site, and the proposed uses would not introduce hazards due to incompatible uses. Thus, the Project would not substantially increase hazards due to a geometric design feature or incompatible uses. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. According to the Safety Element of the City's General Plan, the nearest designated disaster routes to the Project Site include the US-101 and Santa Monica Boulevard, which are within approximately 1 mile from the Project Site. While it is expected that the majority of construction activities for the Project would primarily be confined on-site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. These short-term and temporary construction activities could temporarily affect emergency response for emergency vehicles along Cahuenga Boulevard and other main connectors due to traffic during the Project's construction phase; however, as previously discussed, travel lanes in each direction would be maintained adjacent to the Project Site and

emergency access in and around the Project Site would not be impeded. In addition, haul trucks would use the most direct route to the US-101, located approximately 0.6 mile north of the Project Site, and would travel north along Cahuenga Boulevard to the US-101, thereby limiting activity in area roadways. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. 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 Cahuenga Boulevard. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. Therefore, the Project would not result in inadequate emergency access to the Project Site or surrounding uses. Impacts regarding inadequate emergency access would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC 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:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☒	☐	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐

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

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural

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

Potentially Significant Impact (a and b). Assembly Bill (AB) 52 established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in PRC Section 21074, which is part of the CEQA statute. As specified in AB 52, a lead agency must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As noted above, the Project would require excavations up to 82 feet below grade. Therefore, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with AB 52, the City will notify all applicable tribes, and the City will participate in any requested consultations for the Project. Further analysis of this topic will be provided in the EIR.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☒	☐	☐	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☒	☐	☐	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

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

Potentially Significant Impact. Water, wastewater, electric power, natural gas, and telecommunication systems consist of two components, the source of the supply or place of treatment (for wastewater), and the conveyance systems (i.e., distribution lines and mains) that link the location of these facilities to an individual development site. Given the Project's increase in the amount of developed floor area on the Project Site and the potential corresponding increase in water, electricity, and natural gas demand, further analysis of these topics in an EIR will be provided.

With regard to wastewater, wastewater generated by the Project would be conveyed by the existing wastewater conveyance systems for treatment at the Hyperion Water Reclamation Plant (HWRP). The HWRP has a capacity of 450 million gallons per day (mgd),[76] and current average wastewater flows are at approximately 256 mgd.[77] Accordingly, the remaining available capacity at the Hyperion Treatment Plant is approximately 194 mgd.[78]

As shown in Table 1 on page 80, based on sewage generation factors established by the City Department of Public Works, Bureau of Sanitation's (LASAN), the Project would generate a net of approximately 19,712 gallons of wastewater per day, or approximately 0.02 mgd, upon completion. The Project's average daily wastewater flow of 0.02 mgd would represent approximately 0.01 percent of the current 194 mgd available capacity of the HWRP.[79] Therefore, Project-generated wastewater would be accommodated by the existing capacity of the HWRP.

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[76] Los Angeles Department of Water and Power, One Water LA 2040 Plan-Volume 2, Table ES.4, Water Reclamation Plant Summary Wastewater Facilities Plan One Water LA 2040 Plan.

[77] Los Angeles Department of Water and Power, One Water LA 2040 Plan-Volume 2, Table ES.1, Projected Wastewater Flows.

[78] 450 mgd - 256 mgd = 194 mgd

[79] 19,712 gpd ÷ 194,000,000 mgd) x 100 = 0.0101 (~0.01%)

Table 1
Estimated Project Wastewater Generation

Land Use	No. of Units/ Floor Area	Wastewater Generation Factor (gpd/unit)[a]	Total Wastewater Generation (gpd)
Existing to Be Removed			
Restaurant	9,300 sf[b]	30 gpd/1,000 sf	18,600
Vacant Building	12,113 sf	—	—
Total Existing to Be Removed			**18,600**
Proposed			
Office	210,769 sf	120 gpd/1,000 sf	25,292
Commercial (Restaurant)	6,500 sf[b]	30 gpd/1,000 sf	13,020
Subtotal Wastewater Generation			**38,312**
Less Existing to be Removed			18,600
Net Wastewater Generation (Proposed – Existing to Be Removed)			**19,712**

sf = square feet

[a] *Based on sewage generation rates provided by the City of Los Angeles Bureau of Sanitation (2012).*

[b] *Restaurant space is assumed to be all full-service restaurant and assumed to be equivalent to 15 sf/seat for a conservative wastewater generation estimate.*

Source: Eyestone Environmental, 2021.

Sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing sewer main adjacent to the Project Site. Installation of wastewater infrastructure would be limited to on-site wastewater distribution and minor off-site work associated with connections to the public main. Although no upgrades to the public main are anticipated, minor off-site work is required to connect to the public main. Therefore, a construction management plan would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including maintaining two lanes of travel and ensuring safe and emergency vehicle access. Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable City and California Plumbing Code standards.

With regard to stormwater drainage, as discussed above in Checklist Section X, Hydrology and Water Quality, the Project's overall percentage of impervious area is expected to remain the same as the current condition of the Project Site. Therefore, there would be no incremental increase in runoff volumes. As such, the Project would not create runoff which would exceed the capacity of existing or planned drainage systems.

With regard to telecommunication facilities, the Project would require construction of new or extension of existing on-site telecommunications infrastructure to serve the proposed office and commercial uses. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. When considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration and would cease to occur when installation is complete. Installation of new telecommunications

infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers.

Based on the above, the Project would not require or result in the relocation or construction of new or expanded wastewater treatment, stormwater drainage, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. As such, impacts would be less than significant, and no mitigation measures are required. No further analysis of these topics in an EIR is required.

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

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

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

Less Than Significant Impact. As discussed above in Response to Checklist Question XIX.a, the Project would generate a net of approximately 19,712 gpd of wastewater during operation. Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the HWRP. The HWRP has a capacity of 450 mgd and current wastewater flow levels are at 256 mgd.[80] Accordingly, the remaining available capacity at the HWRP is approximately 194 mgd.[81] As such, the HWRP would have sufficient capacity to accommodate the Project. Therefore, the Project would not result in a determination by the wastewater treatment provider that serves the Project Site that it does not have adequate capacity to serve the Project. As such, the Project's impact on the wastewater treatment provider would be less than significant impact, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. While the Bureau of Sanitation generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or

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[80] Los Angeles Department of Water and Power, One Water LA 2040 Plan-Volume 2, Table ES.1, Projected Wastewater Flows.

[81] 450 mgd - 256 mgd = 194 mgd

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.[82] Nine Class III landfills and one inert waste landfill with solid waste facility permits are currently serving the County.[83] In addition, there is one solid waste transformation facility within Los Angeles County that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery.

Based on the 2019 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the most recent report available, the total remaining permitted Class III landfill capacity in the County is estimated at 148.4 million tons. The permitted inert waste landfill serving the County is Azusa Land Reclamation. This facility has 58.84 million tons of remaining capacity and an average daily in-County disposal rate of 854 tons per day.[84] Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the CoIWMP Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.[85]

Additionally, the City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan sets a goal of becoming a "zero waste" city by 2030. To this end, the City 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.[86] The City of Los Angeles is currently diverting 76.4 percent of its waste from landfills.[87] The City has adopted the goal of achieving 90 percent diversion by 2025, and zero waste by 2030.

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

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

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

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

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

86 City of Los Angeles, Solid Waste Integrated Resource Plan FAQ; www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp;jsessionid=4rBvp9e5qSOLwE8dII_cRnuj1RXccAjkyRRzlvmgK_u3s_mb2rx-!1445496010!-688587153?_adf.ctrl-state=1c9nsn6o1h_1&_afrLoop=14613736938815519&_afrWindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D14613736938815519%26_afrWindowMode%3D0%26_adf.ctrl-state%3D1c9nsn6o1h_5, accessed December 16, 2020.

87 LASAN, 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 16, 2020.

Construction

The Project Site is currently developed with a seven-story, 67,581-square-foot office building; a single-story, 9,300-square-foot restaurant; a three-story, 12,113-square-foot vacant building; and surface parking areas. The Project would include the demolition of the two of the three existing buildings on-site totaling 21,793 square feet and development of 217,269 square feet of floor area consisting of approximately 210,769 square feet of office uses and 6,500 square feet of ground floor commercial (restaurant) space.

As shown in Table 2 on page 84, based on construction and debris rates established by the USEPA, it is anticipated that construction of the Project would generate a total of approximately 1,660 tons of demolition debris and 423 tons of construction debris, for a combined total of 2,082 tons of construction-related waste.

Pursuant to the requirements of Senate Bill 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Furthermore, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. Thus, although the total diversion rate may ultimately exceed 75 percent, this analysis conservatively assumes a diversion rate of 75 percent. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. As shown in Table 2, after accounting for mandatory recycling, the Project would result in approximately 521 tons of construction-related waste in the County's permitted inert landfill (i.e., Azusa Land Reclamation Landfill) throughout the construction period. This amount of construction and debris waste would represent approximately 0.0009 percent of the Azusa Land Reclamation Landfill's existing remaining disposal capacity of 58.84 million tons. Thus, the total amount of construction and demolition waste generated by the Project would represent a small fraction of the remaining capacity at this permitted inert landfill serving Los Angeles County. Given the remaining permitted capacity at the Azusa Land Reclamation facility as well as the remaining 148.4 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 3 on page 85, upon full buildout, the Project would result in a net increase in solid waste generation of 277 tons per year. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as compliance with Assembly Bill 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.[88]

[88] City of Los Angeles, Solid Waste Integrated Resource Plan FAQ; www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp;jsessionid=4rBvp9e5qSOLwE8dII_cRnuj1RXccAjkyRRzlvmgK_u3s_mb2rx-!1445496010!-68

(Footnote continued on next page)

Table 2
Project Demolition and Construction Waste Generation

Building	Size	Generation Rate (lbs/sf)[a,b]	Total (tons)[b]
Demolition Waste			
Restaurant	9,300 sf	155	721
Vacant Building	12,113 sf	155	939
Demolition Waste Subtotal			*1,660*
Construction Waste			
Office	210,769 sf	3.89	410
Commercial (high-quality restaurant)	6,500 sf	3.89	13
Construction Waste Subtotal			*423*
Total for Demolition and Construction Waste			***2,082***
Total After 75-Percent Recycling			**521**

lbs = pound

sf = square feet

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

[b] *Used conversion of 1 ton = 2,000 pounds. Numbers have been rounded and may not add up exactly.*

Source: Eyestone Environmental, 2021.

The estimated annual net increase in solid waste that would be generated by the Project of tons represents approximately 0.0002 percent of the remaining capacity (148.4 million tons) for the County's Class III landfills open to the City of Los Angeles.[89]

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

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

Less Than Significant Impact. Solid waste management in 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

8587153?_adf.ctrl-state=1c9nsn6o1h_1&_afrLoop=14613736938815519&_afrWindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D14613736938815519%26_afrWindowMode%3D0%26_adf.ctrl-state%3D1c9nsn6o1h_5, accessed December 16, 2020.

89 (277 tons per year/ 148.4 million tons) x 100 ≈ 0.0002%

Table 3
Estimated Project Solid Waste Generation

Building	Size	Employee Generation Rate per sf	Estimated No. of Employees	Solid Waste Generation Rate[a]	Total Generation (tons/year)
Existing to Be Removed[b]					
Restaurant	9,300 sf	0.004	38	2.98 tons/emp/yr	113
Vacant Building	12,113 sf	—	0	—	0
Total Existing to Be Removed					**113**
Proposed[c]					
Office	210,769 sf	0.004	844	0.37 tons/emp/yr	312
Commercial (high-quality restaurant)	6,500 sf	0.004	26	2.98 tons/emp/yr	77
Total with Implementation of Project					**390**
Total Net Increase (Proposed – Existing to Be Removed)					**277**

emp = employees

sf = square feet

yr = year

[a] *Non-residential yearly solid waste generation factors from LASAN City Waste Characterization and Quantification Study, Table 4, July 2002. Assumes rate of 2.98 ton per employee per year (Retail – Restaurants) for restaurant uses. Assumes rate of 0.37 ton per employee per year (Services – Business) for office use.*

[b] *Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the employee generation rate 0.004 employee per square foot for "High-Turnover Sit-Down Restaurant" land use is applied to the 4,055 square feet of retail uses and the 9,300-square-foot restaurant.*

[c] *Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the employee generation rate 0.004 employee per square foot for "High-Turnover Sit-Down Restaurant" land use is applied to the 6,500 square feet of high-quality restaurant space and the rate 0.004 employee per square foot for "General Office" land use is applied to the 210,769 square feet of office uses.*

Source: Eyestone Environmental, 2021.

management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the 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 waste[90] 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 be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.[91] The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XX. WILDFIRE

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

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

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

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

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

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

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

No Impact (a-d). The Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Therefore, these thresholds would not apply to the Project. Specifically, the Project Site is located in an urbanized area, and there are no wildlands located in the vicinity of the Project Site. The Project Site is also not located within a City-designated Very High Fire Hazard Severity Zone.[92] Therefore, no impacts regarding wildfire risks would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

[92] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5546005006, 5546005007, 5546005029. 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.

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

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

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

As discussed above, further evaluation of the Project's potential impacts on cultural resources will be included in an 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. The potential for cumulative impacts occurs when the impacts of the Project are combined with impacts from related development projects and result in impacts that are greater than the impacts of the Project alone. Located in the vicinity of the Project Site are other current and reasonably foreseeable projects, the development of which, in conjunction with that of the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in the EIR for the following subject areas: air quality; cultural resources; energy; geology and soils; greenhouse gas emissions; land use and planning; noise; public

services (fire protection and police protection); transportation; tribal cultural resources; and utilities and service systems (water supply and energy).

Regarding cumulative aesthetics impacts, related projects would be reviewed on a case-by-case basis by the City to comply with LAMC requirements regarding building heights, setbacks, massing and lighting or, for those projects that require discretionary actions, to undergo site-specific review regarding building density, design, and light and glare effects. Related projects are also subject to the City's design review process and review for consistency with zoning and regulatory documents governing scenic quality. Furthermore, in any case, pursuant to Senate Bill 743, PRC Section 21099, and Zoning Information File ZI No. 2452, the Project's aesthetics impacts cannot be considered significant. Given the Project Site's location in a transit priority area, other residential, mixed-use, and employment center development projects located in the vicinity of the Project Site are anticipated to be of similar aesthetic character and would thus not have incremental combined effects that could create a cumulatively considerable impact. Thus, cumulative impacts associated with aesthetics would be less than significant.

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

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

Related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, related projects would be subject to the City's LID requirements. In addition, construction projects greater than 1 acre would be subject to NPDES permit requirements, including development of a SWPPP, Standard Urban Stormwater Mitigation Plan requirements during operation, and other local requirements pertaining to hydrology and surface water quality. It is anticipated that related projects would also be evaluated on an individual basis by City of Los Angeles Department of Public Works to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. Thus, Project impacts related to hydrology and water quality would not be cumulatively considerable and, cumulative impacts would be less than significant.

In terms of population and housing, related development would not induce substantial population growth in the vicinity of the Project Site since most of the area is already fully developed and occupied by a long standing residential population. In addition, not all related projects would include residential uses. As discussed in the analysis above, the Project does not propose residential uses and thus would not directly contribute to population growth. While the Project would not displace housing or people, other projects

might displace existing housing and people residing in them. However, even if construction of replacement housing were required elsewhere, such developments would likely occur on infill sites within the City and the appropriate level of environmental review would be conducted to analyze the extent to which the related projects could cause significant environmental impacts. Overall, the Project's contribution would not be cumulatively considerable, and cumulative impacts related to population and housing would be less than significant.

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

Development of the related projects would result in an increase in the demand for sanitary sewer service in the HWRP. As described above in Response to Checklist Question No. XIX.a, the existing design capacity of the HWRP is approximately 450 mgd and current wastewater flow levels are at 256 mgd. Based on the future wastewater flow and the wastewater treatment capacity of the HWRP, sufficient wastewater treatment capacity would be available to serve the Project and related projects. In addition, the City would continue to monitor wastewater flows and update infrastructure, as necessary, to accommodate the growth within the City. New development projects occurring in the vicinity of the Project Site, including the related projects, would also be required to coordinate with LASAN via a Sewer Capacity Availability Request or by requesting Wastewater Service Information to determine adequate sewer capacity. Furthermore, new development projects, including the related projects, would be subject to Los Angeles Municipal Code Sections 64.11 and 64.12, which require approval of a sewer permit prior to connection to the sewer system. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to the wastewater treatment systems. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

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

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

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

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

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

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project could result in potentially significant impacts with regard to the following topics: air quality; cultural resources;

energy; geology and soils; greenhouse gas emissions; land use and planning; noise; public services (fire protection and police protection); transportation; tribal cultural resources; and utilities and service systems (water supply and energy). As a result, these potential effects will be analyzed further in the EIR.