



## Wilshire Courtyard Redevelopment Project

Case No. ENV-2020-3851-EIR

**Project Location:** 5700–5750 Wilshire Boulevard, Los Angeles, CA 90036

**Community Plan Area:** Wilshire

**Council District:** 4—Raman

**Project Description:** The Wilshire Courtyard Redevelopment Project (Project) includes the renovation of the existing Wilshire Courtyard office campus located at 5700–5780 Wilshire Boulevard; 712–752 South Curson Avenue; 5721–5773 West 8th Street; and 715–761 South Masselin Avenue (Project Site) in the Miracle Mile district of the Wilshire Community Plan Area of the City of Los Angeles (City). The 382,186-square-foot (8.77-acre) Project Site is currently developed with two, six-story primarily office buildings comprising 1,002,990 square feet of floor area as well as three levels of subterranean parking beneath the two buildings. The Project would retain and renovate the southern portion of the existing buildings and would demolish the northern portion of the two existing office buildings for the addition of approximately 1,923,837 square feet of new floor area consisting of 1,806,237 square feet of office uses and 117,600 square feet of ground floor commercial space. The proposed uses would be located within two new high-rise towers ranging from 35- to 41-stories with approximate heights of 535 feet to 625 feet, respectively. A portion of the existing parking would also be removed, and the remaining parking area would be renovated. In addition, the Project would provide 2,901 new vehicular parking spaces for a total of 4,650 vehicular parking spaces within the Project Site. Parking would be provided within seven above-grade parking levels. The Project would also redesign the existing landscaping and open space within the Project Site to include a podium, courtyards, exterior terraces, streetscapes, and walkways to connect the proposed buildings. Upon completion, the Project would result in a net lot area of 390,092 square feet (8.9 acres) within the Project Site, with a total floor area of approximately 2,340,552 square feet comprised of 2,222,952 square feet of office floor area and 117,600 square feet of commercial floor area with a floor area ratio (FAR) of 6:1.

**PREPARED FOR:**

The City of Los Angeles  
Department of City Planning

**PREPARED BY:**

Eyestone Environmental, LLC

**APPLICANT:**

Onni Group

June 2021

# TABLE OF CONTENTS

---

	<u>Page</u>
<b>Introduction .....</b>	<b>3</b>
<b>Executive Summary .....</b>	<b>6</b>
<b>Project Description.....</b>	<b>9</b>
1. Project Summary .....	9
2. Environmental Setting .....	9
3. Description of Project .....	13
4. Requested Permits and Approvals .....	22
5. Responsible Public Agencies.....	23
<b>Environmental Impact Analysis .....</b>	<b>24</b>
I. Aesthetics .....	24
II. Agriculture and Forestry Resources .....	36
III. Air Quality .....	38
IV. Biological Resources.....	41
V. Cultural Resources.....	45
VI. Energy .....	47
VII. Geology and Soils .....	48
VIII. Greenhouse Gas Emissions .....	54
IX. Hazards and Hazardous Materials .....	55
X. Hydrology and Water Quality .....	64
XI. Land Use and Planning.....	71
XII. Mineral Resources .....	73
XIII. Noise .....	74
XIV. Population and Housing.....	75
XV. Public Services.....	76
XVI. Recreation .....	80
XVII. Transportation .....	81
XVIII. Tribal Cultural Resources .....	82
XIX. Utilities and Service Systems.....	84
XX. Wildfire.....	90
XXI. Mandatory Findings of Significance.....	92

## List of Figures

	<u>Page</u>
Figure 1	Project Location Map ..... 10
Figure 2	Aerial Photograph of the Project Site and Vicinity ..... 11
Figure 3	Areas Proposed for Renovation and Construction ..... 15
Figure 4	Conceptual Site Plan ..... 16
Figure 5	Landscape/Open Space Plan—Ground Floor (North) ..... 17
Figure 6	Landscape/Open Space Plan—Ground Floor (South) ..... 18
Figure 7	Landscape/Open Space Plan—Podium Level ..... 20
Figure 8	Landscape/Open Space Plan—Levels 16, 23, and 32 ..... 21

## List of Tables

	<u>Page</u>
Table 1	Summary of Proposed Floor Area ..... 14
Table 2	Applicable Design Principles and Guidelines of the Miracle Mile Community Design Overlay District ..... 29
Table 3	Project Demolition and Construction Waste Generation ..... 88
Table 4	Estimated Project Solid Waste Generation ..... 89

## Appendices

Appendix IS-1	Tree Survey
Appendix IS-2	Geotechnical Investigation
Appendix IS-3	Phase I ESA, Phase II ESA, and Methane Report
Appendix IS-3.1	Phase I Environmental Site Assessment
Appendix IS-3.2	Phase II Environmental Site Assessment
Appendix IS-3.3	Methane Report
Appendix IS-4	Hydrology Report

# 1 INTRODUCTION

---

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

This Initial Study 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). Based on the analysis provided within this Initial Study, the City has concluded that 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.<sup>1</sup>

---

<sup>1</sup> 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 of 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

---

<b>PROJECT TITLE</b>	<b>Wilshire Courtyard Redevelopment Project</b>
ENVIRONMENTAL CASE NO.	ENV-2020-3851-EIR
RELATED CASES	CPC-2020-3850-ZC-HD-SPR-MCUP-CDO

<b>PROJECT LOCATION</b>	<b>5700–5750 Wilshire Boulevard, Los Angeles, CA 90036</b>
COMMUNITY PLAN AREA	Wilshire
GENERAL PLAN DESIGNATION	Regional Commercial
ZONING	(Q)C4-1-CDO
COUNCIL DISTRICT	4—Raman

<b>LEAD AGENCY</b>	<b>City of Los Angeles</b>
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	Jivar Afshar
ADDRESS	<b>221 North Figueroa Street, Suite 1350, Los Angeles, CA 90012</b>
PHONE NUMBER	(213) 847-3630
EMAIL	jivar.afshar@lacity.org

<b>APPLICANT</b>	<b>Onni Group</b>
ADDRESS	315 West 9th Street, Suite 801 Los Angeles, CA 90015
PHONE NUMBER	(213) 629-2041

---

### 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.

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> Aesthetics                       | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials       | <input type="checkbox"/> Recreation                                    |
| <input checked="" type="checkbox"/> Air Quality           | <input type="checkbox"/> Hydrology/Water Quality             | <input checked="" type="checkbox"/> Transportation                     |
| <input type="checkbox"/> Biological Resources             | <input checked="" type="checkbox"/> Land Use/Planning        | <input checked="" type="checkbox"/> Tribal Cultural Resources          |
| <input checked="" type="checkbox"/> Cultural Resources    | <input type="checkbox"/> Mineral Resources                   | <input checked="" type="checkbox"/> Utilities/Service Systems          |
| <input checked="" type="checkbox"/> Energy                | <input checked="" type="checkbox"/> Noise                    | <input type="checkbox"/> Wildfire                                      |
| <input checked="" type="checkbox"/> Geology/Soils         | <input type="checkbox"/> Population/Housing                  | <input checked="" type="checkbox"/> 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 than 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 Wilshire Courtyard Redevelopment Project (Project) includes the renovation of the existing Wilshire Courtyard office campus located at 5700–5780 Wilshire Boulevard; 712–752 South Curson Avenue; 5721–5773 West 8th Street; and 715–761 South Masselin Avenue (Project Site) in the Miracle Mile district of the Wilshire Community Plan Area of the City of Los Angeles (City). The approximately 382,186-square-foot (8.77-acre) Project Site is currently developed with two, six-story primarily office buildings with ground floor commercial uses along Wilshire Boulevard comprising 1,002,990 square feet of floor area as well as three levels of subterranean parking beneath the two buildings. The Project would retain and renovate the southern portion of the existing buildings comprised of 416,715 square feet of floor area, demolish the northern portion of the two existing buildings comprised of 586,275 square feet of floor area, and construct approximately 1,923,837 square feet of new floor area consisting of 1,806,237 square feet of office uses and 117,600 square feet of ground floor commercial space. The proposed uses would be located within two new high-rise towers ranging from 35- to 41-stories with approximate heights of 535 feet to 625 feet, respectively. A portion of the existing parking would also be removed, and the remaining parking area would be renovated. In addition, the Project would provide 2,901 new vehicular parking spaces for a total of 4,650 vehicular parking spaces. Parking would be provided within seven above-grade parking levels. The Project would also redesign the existing landscaping and open space within the Project Site to include a podium, courtyards, exterior terraces, streetscapes, and walkways to connect the proposed buildings. Upon completion of the Project, the net lot area of the Project Site would be approximately 390,092 square feet (8.9 acres). In addition, the total floor area on the Project Site would be approximately 2,340,552 square feet comprised of 2,222,952 square feet of office floor area and 117,600 square feet of commercial floor area with a floor area ratio (FAR) of 6:1.

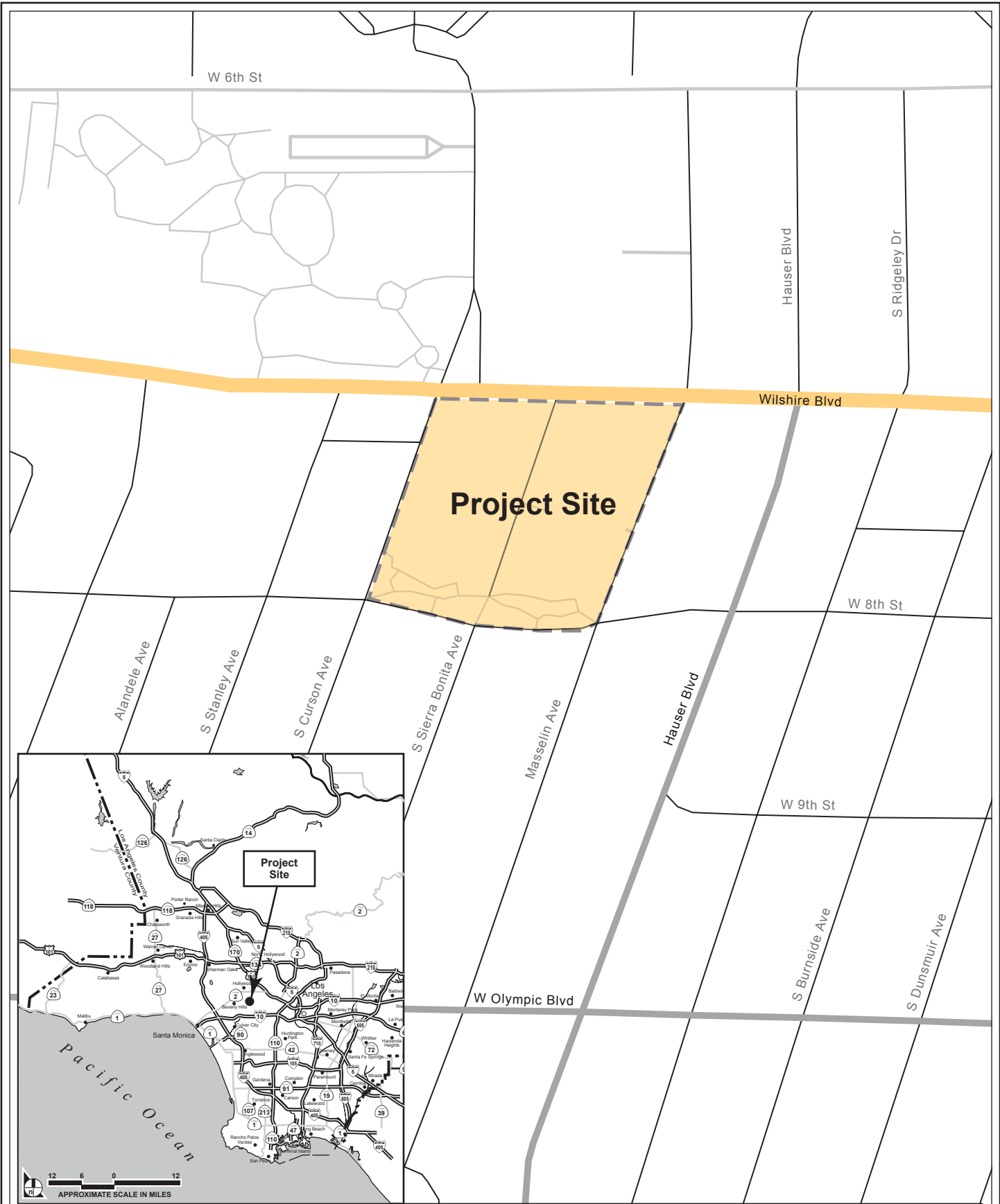
### 3.2 ENVIRONMENTAL SETTING

#### 3.2.1 Project Location

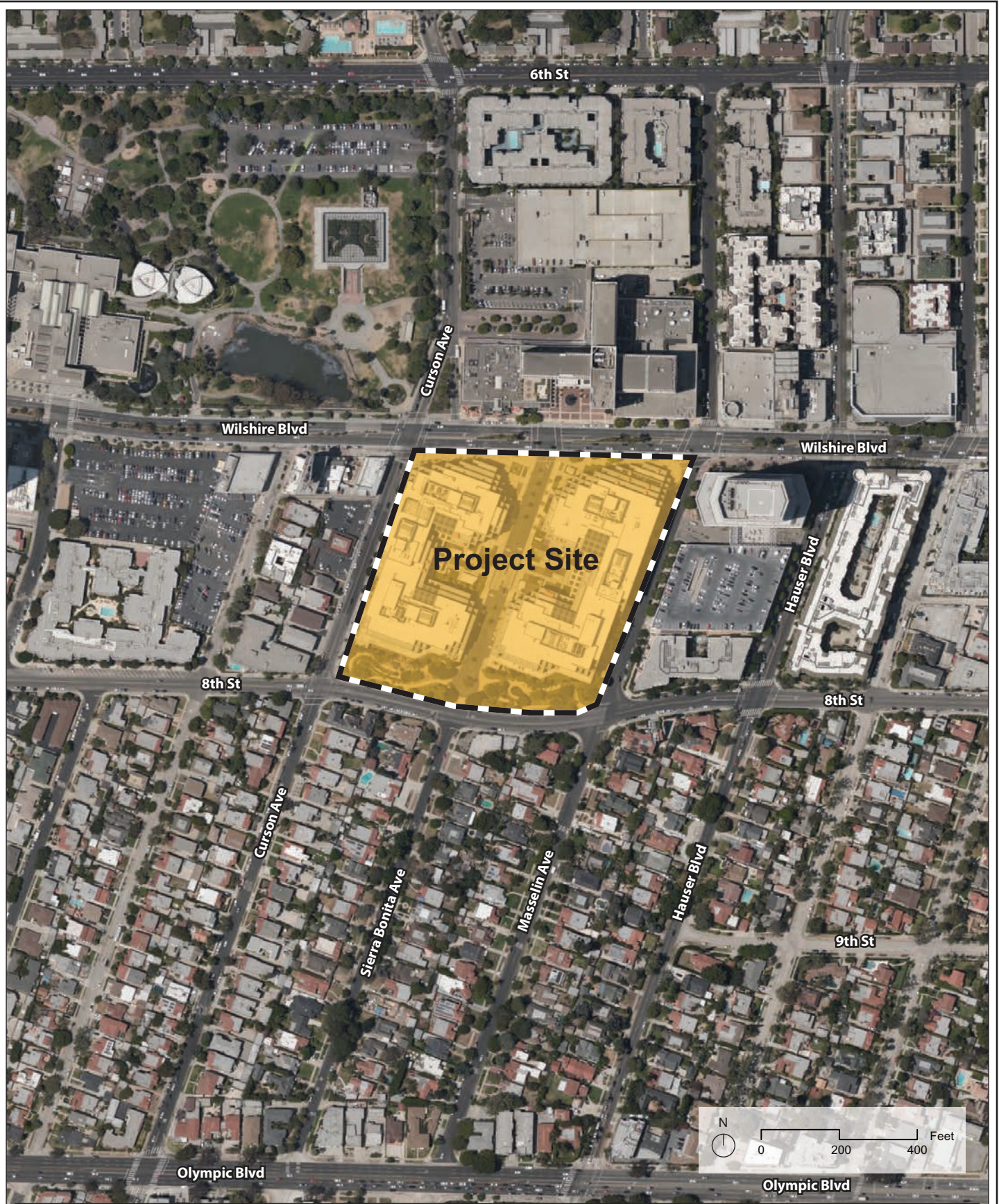
The Project Site is located at 5700–5780 Wilshire Boulevard; 712–752 South Curson Avenue; 5721–5773 West 8th Street; and 715–761 South Masselin Avenue in the Miracle Mile district of the Wilshire Community Plan Area of the City. As shown in Figure 1 on page 10 and in Figure 2 on page 11, the Project Site is bound by Wilshire Boulevard to the north, South Masselin Avenue to the east, West 8th Street to the south, and South Curson Avenue to the west. Regional access to the Project Site is provided by the I-10, which is located approximately 2.6 miles south of the Project Site. A major arterial providing regional access to the Project Site is Wilshire Boulevard, which is located adjacent to the Project Site.

#### 3.2.2 Existing Conditions

The Project Site is currently developed with two six-story primarily office buildings with ground floor commercial uses comprising 1,002,990 square feet of floor area and three levels of subterranean parking below the buildings providing 2,538 parking spaces. The building at 5700 Wilshire Boulevard (referred to



**Figure 1**  
Project Location Map



**Figure 2**  
Aerial Photograph of the Project Site and Vicinity

as the East Tower) consists of 531,700 square feet of floor area and the building at 5750 Wilshire Boulevard (referred to as the West Tower) consists of 471,290 square feet of floor area. A two-way, closed loop, private roadway referred to as Courtyard Place herein runs between the two buildings and provides primary access for the office complex from Wilshire Boulevard. Courtyard Place also provides vehicular access to the parking garages contained within each building. Additional vehicular access to the parking areas of the Project Site is provided via several driveways along South Curson Avenue, and South Masselin Avenue. Pedestrian access to the Project Site is located along the perimeter of the Project Site and along the paved cul-de-sac. The Project Site is relatively flat and contains landscaping in the form of trees, hedges, and shrubs. In addition, the southern portion of the Project Site fronting West 8th Street is improved with open space to a depth of approximately 80 feet and includes pedestrian walkways, seating areas, playground, water feature, landscaping and trees.

The Project Site is located within the planning boundary of the Wilshire Community Plan<sup>2</sup> area and is designated as Regional Commercial. The northern 150 feet of the Project Site is zoned [Q]C4-2-CDO<sup>3</sup> (Commercial zone, Height District 2, Community Design Overlay), and the remaining portion is zoned [Q]C4-1-CDO (Commercial zone, Height District 1, Community Design Overlay). The Project Site is subject to certain [Q] development conditions pursuant to a zone change granted by the City in 1985 for the development of the existing office complex. Pursuant to the LAMC, the C4 zone permits a wide array of land uses, including commercial, office, multi-family residential, retail, and hotel uses. The “2” indicates that the Project Site is located in Height District 2, which in conjunction with the C4 Zone, does not impose a maximum building height limitation but does limit the FAR of 6:1. The “1” indicates that the Project Site is located in Height District 1, which in conjunction with the C4 Zone, does not impose a maximum building height but does limit the FAR to 1.5:1. The “CDO” designation indicates that the Project Site is located within the boundaries of the Miracle Mile Community Design Overlay District (CDO), which provides guidance and direction in the design of new and rehabilitation of existing buildings and storefronts in order to improve the appearance, enhance the identity, and promote the pedestrian environment of the district. The CDO also provides guidelines and standards for elements, such as site planning, architectural treatment, roof lines, building articulation, parking, entry treatment, ground floor lighting, and landscape.

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.<sup>4</sup> In addition, the Project Site is identified as being located within a Metro right-of-way (ROW) Project Area. As described by ZI-1117, adopted by City Council on May 20, 2018 and revised on December 19, 2019, prior to the issuance of any building permit, Metro must review applicable projects within 100 feet of Metro-owned Rail or Bus Rapid Transit ROW to ensure safe access to, and operations of, transportation services and facilities. The Project Site is also

---

<sup>2</sup> The City is currently in the process of updating the Wilshire Community Plan.

<sup>3</sup> It should be noted when Ordinance 160,007 was adopted for the office complex on the Project Site, the zoning was placed in a (Q) qualified condition per LAMC Section 12.32 G.2. The zoning will remain in a (Q) qualified condition until the time when the proposed uses authorized by the ordinance are substantially constructed (LAMC Sec. 12.32 G.2.f). After this, the (Q) becomes permanent which is reflected with a bracketed [Q]. ZIMAS often does accurately reflect when this occurs.

<sup>4</sup> 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.

located approximately 0.35 mile from the future Metro Purple Line station stop at Wilshire and Fairfax that is currently under construction.

### **3.2.3 Surrounding Land Uses**

The Project Site is located in the northern portion of the Miracle Mile district of the Wilshire Community Plan Area. The area surrounding the Project Site is developed primarily with a mix of mid- to high-rise, high-density commercial, office, and residential uses. Uses located adjacent to the Project Site include: The Screen Actors Guild–American Federation of Television and Radio Artists building to the north; a 27-story office building, a four-story above grade parking structure, and Oakwood Miracle Mile apartments to the east; one- to two-story residential buildings to the south; and two- to three-story residential buildings, a three-story office building, and ancillary surface parking to the west. The land uses surrounding the Project Site are Regional Commercial; Medium Residential; Public Facilities; High Medium Residential; Low II Residential; and Low Medium I Residential; and have varying zoning designations, including [Q]C4-2-CDO; PF-1D; PB-2; [Q]R4-1; R1-1-O-HPOZ; R2-1-O-HPOZ; [Q]R3-1-HPOZ; [Q]R3-1; and [Q]C2-1-CDO-HPOZ.

## **3.3 DESCRIPTION OF PROJECT**

### **3.3.1 Project Overview**

The Project includes the renovation of the existing Wilshire Courtyard office campus. The Project Site is currently developed with two, six-story primarily office buildings comprising 1,002,990 square feet of floor area as well as three levels of subterranean parking beneath the two buildings. As summarized in Table 1 on page 14 and illustrated in Figure 3 on page 15, the Project would retain and renovate the southern portion of the existing buildings comprised of 416,715 square feet, demolish the northern portion of the two existing office buildings comprised of 586,275 square feet, and construct approximately 1,923,837 square feet of new floor area consisting of 1,806,237 square feet of office uses and 117,600 square feet of ground floor commercial space.

The proposed uses would be located within two new high-rise towers ranging from 35- to 41-stories with approximate heights of 535 feet to 625 feet, respectively. Specifically, the northwestern tower would comprise 35 stories and reach a maximum height of 535 feet and the northeastern tower would comprise 41 stories and reach a maximum height of 625 feet. A portion of the existing parking would also be removed, and the remaining parking area would be renovated. In addition, the Project would provide 2,901 new vehicular parking spaces for a total of 4,650 vehicular spaces. Proposed parking would be provided within seven above-grade parking levels. The Project would also redesign the existing landscaping and open space within the Project Site to include a podium, courtyards, exterior terraces, streetscapes, and walkways to connect the proposed buildings. Overall, the Project would result in a net increase of 1,337,562 square feet of net new floor area within the Project Site. Upon completion of the Project, the total floor area of the buildings on the Project Site would be approximately 2,340,552 square feet comprised of 2,222,952 square feet of office floor area and 117,600 square feet of commercial floor area with a FAR of 6:1.

**Table 1  
Summary of Proposed Floor Area<sup>a</sup>**

<b>Land Use</b>	<b>Existing Floor Area</b>	<b>Existing Floor Area to Be Removed</b>	<b>Proposed New Floor Area</b>	<b>Net New Floor Area</b>
Office	972,067 sf	555,352 sf	1,806,237 sf	1,250,885 sf
Restaurant	1,812 sf	1,812 sf	48,600 sf	46,788 sf
Coffee Shop	1,490 sf	1,490 sf	—	-1,490 sf
Fitness	27,621 sf	27,621 sf	34,000 sf	6,379 sf
Grocery	—	—	35,000 sf	35,000 sf
<b>Total</b>	<b>1,002,990 sf</b>	<b>586,275 sf</b>	<b>1,923,837 sf</b>	<b>1,337,562 sf</b>

*sf = square feet*

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

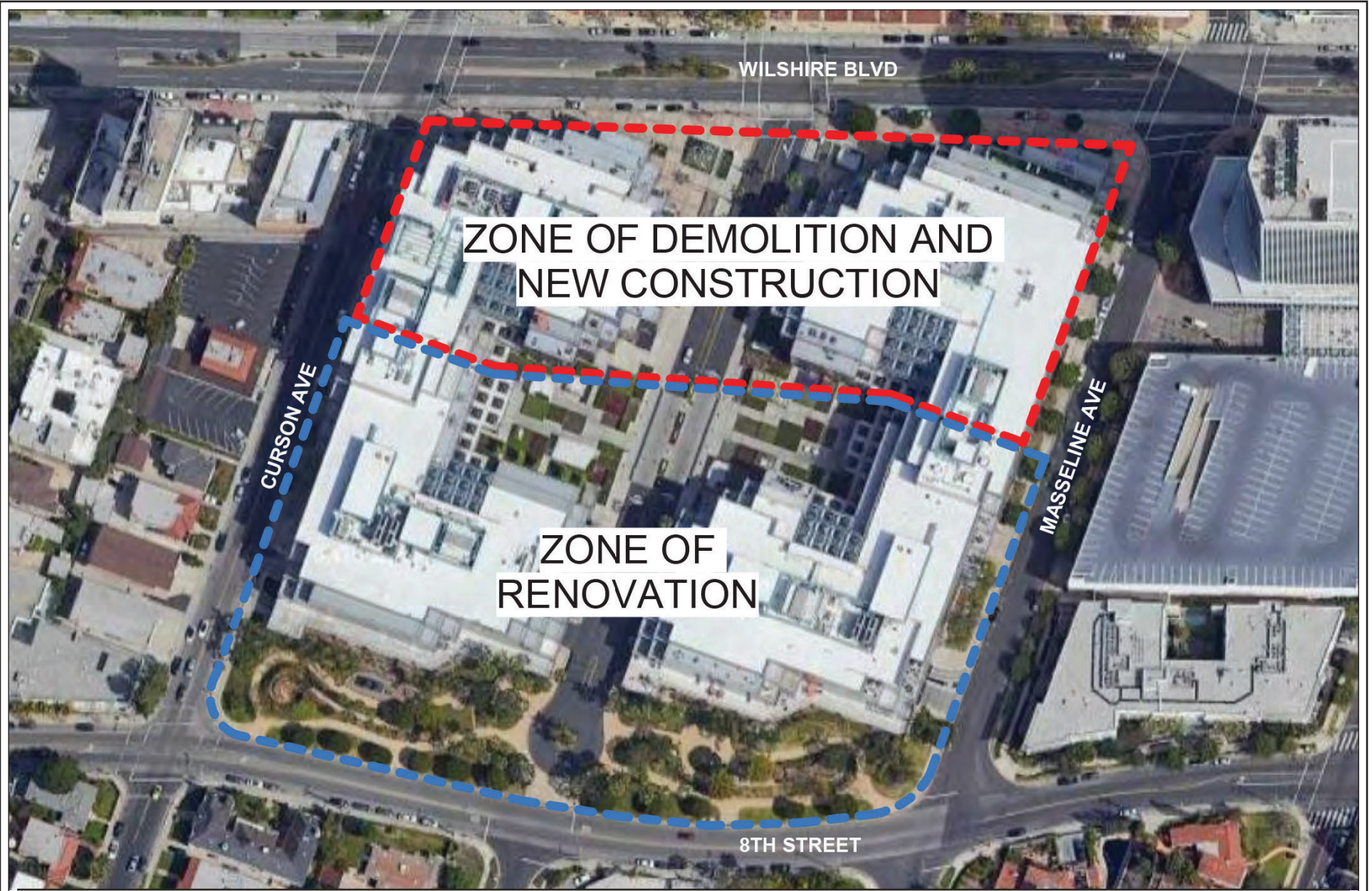
*Source: Eyestone Environmental, 2021.*

### 3.3.2 Design and Architecture

The Project would feature a contemporary architectural style that includes architectural elements already found on the Project Site and in the surrounding neighborhood. As shown in Figure 4 on page 16, the two high-rise office towers would be situated along Wilshire Boulevard and connected via a podium and exterior terraces. As illustrated in Figure 4 the office towers would range from 35- to 41-stories with approximate height of 535 feet to 625 feet, respectively, and would feature materials such as aluminum, glass, and metal. The ground floor of the office towers would contain commercial spaces that could include grocery, restaurant, and fitness uses; an office lobby; a landscaped courtyard and streetscape; and bicycle parking that is conveniently accessible from South Curson Avenue and South Masselin Avenue. The seven above-grade parking levels and retained office uses would be located above the ground floor commercial uses. The above-grade parking levels would be architecturally screened with aluminum, glass, and metal that is compatible with the above grade office levels. The remaining levels of the two office towers would include the new office uses and exterior terraces on Levels 16, 23, and 32.

### 3.3.3 Open Space and Landscaping

The Project would incorporate and renovate a variety of open spaces on the Project Site, particularly within the ground level, Level 8 podium, Level 16, Level 23, and Level 32. As shown in Figure 5 on page 17, the ground level open space amenity areas would include two activated courtyard plazas along the Project Site’s Wilshire Boulevard streetscape fronting proposed restaurant and grocery market spaces with outdoor dining and landscaped seating areas. The existing interior center courtyard plaza bisecting the buildings would also be renovated and activated with outdoor shaded and nonshaded dining seating, lounge areas, and landscaping. The southern open space area fronting on West 8th Street would also be renovated as shown in Figure 6 on page 18.



**Figure 3**

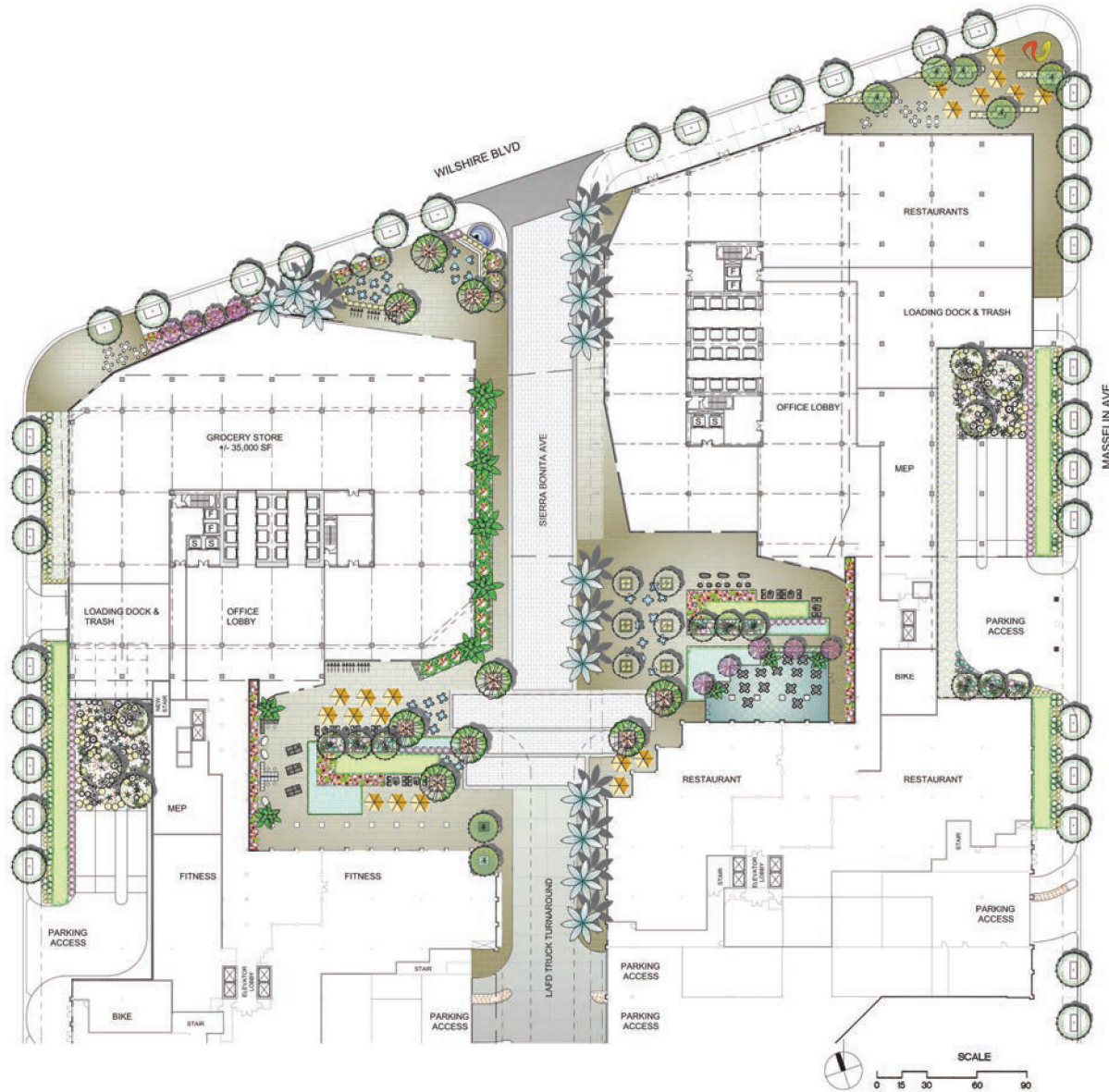
Areas Proposed for Renovation and Construction



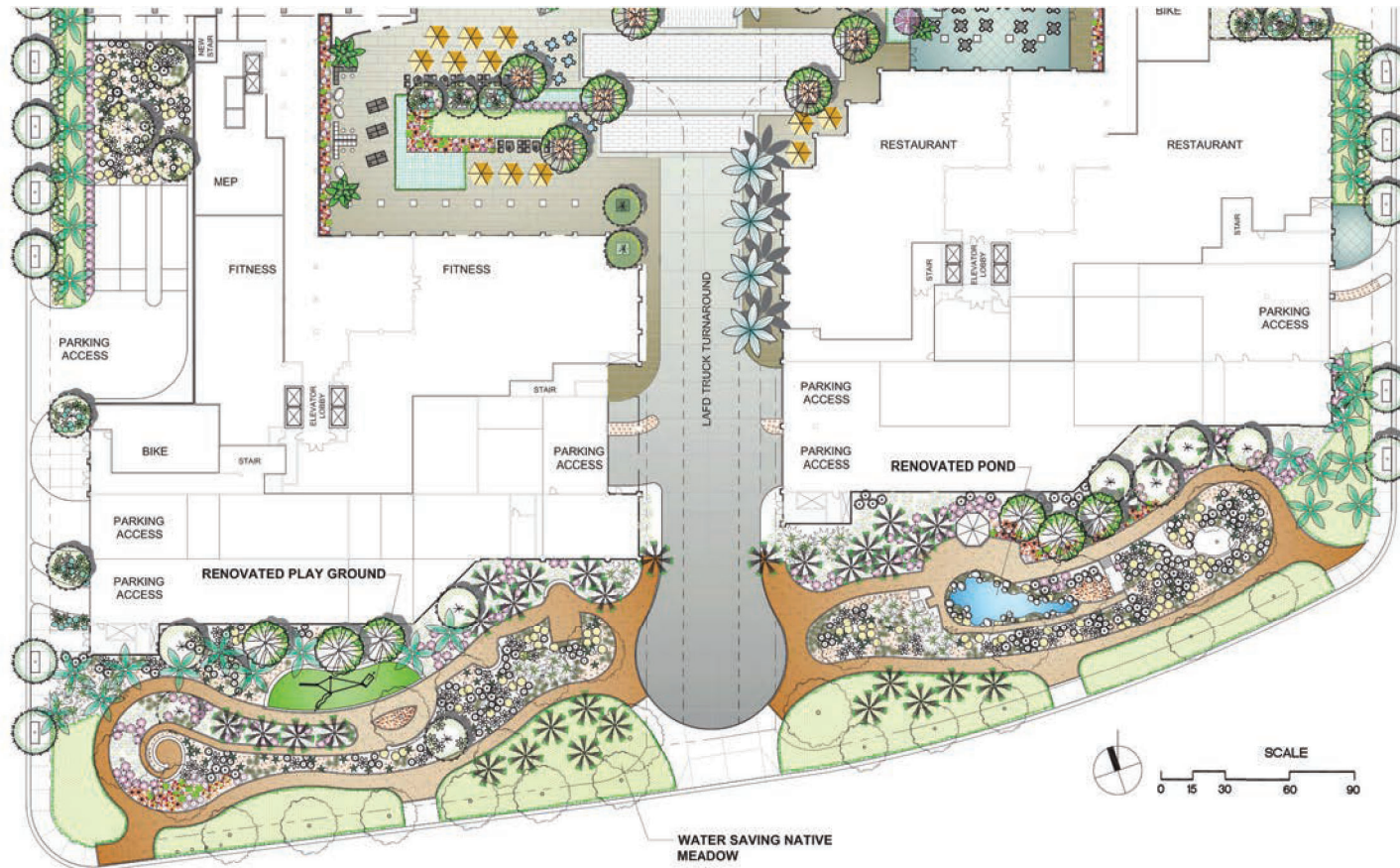


**Figure 4**

Conceptual Site Plan—Ground Floor



**Figure 5**  
Landscape/Open Space Plan—Ground Floor (North)



**Figure 6**  
Landscape/Open Space Plan—Ground Floor (South)

Other open space areas within the Project Site would include common amenity spaces on the podium level, Level 16, Level 23, and Level 32. As shown in Figure 7 on page 20, the podium level would feature outdoor dining seating, lounge areas, a dog park accessible to employees, a bocci ball court, and landscaping. As shown in Figure 8 on page 21, the Project would also provide exterior terraces on Levels 16, 23, and 32, which would feature various dining and seating areas and landscaping. The Project would also enhance the streetscape surrounding the Project Site. Streetscape amenities provided by the Project would include a renovated playground and pond along West 8th Street; various outdoor seating and lounge areas; a water fountain and statue; and new trees, shrubs, and large planters.

### **3.3.4 Access, Circulation, and Parking**

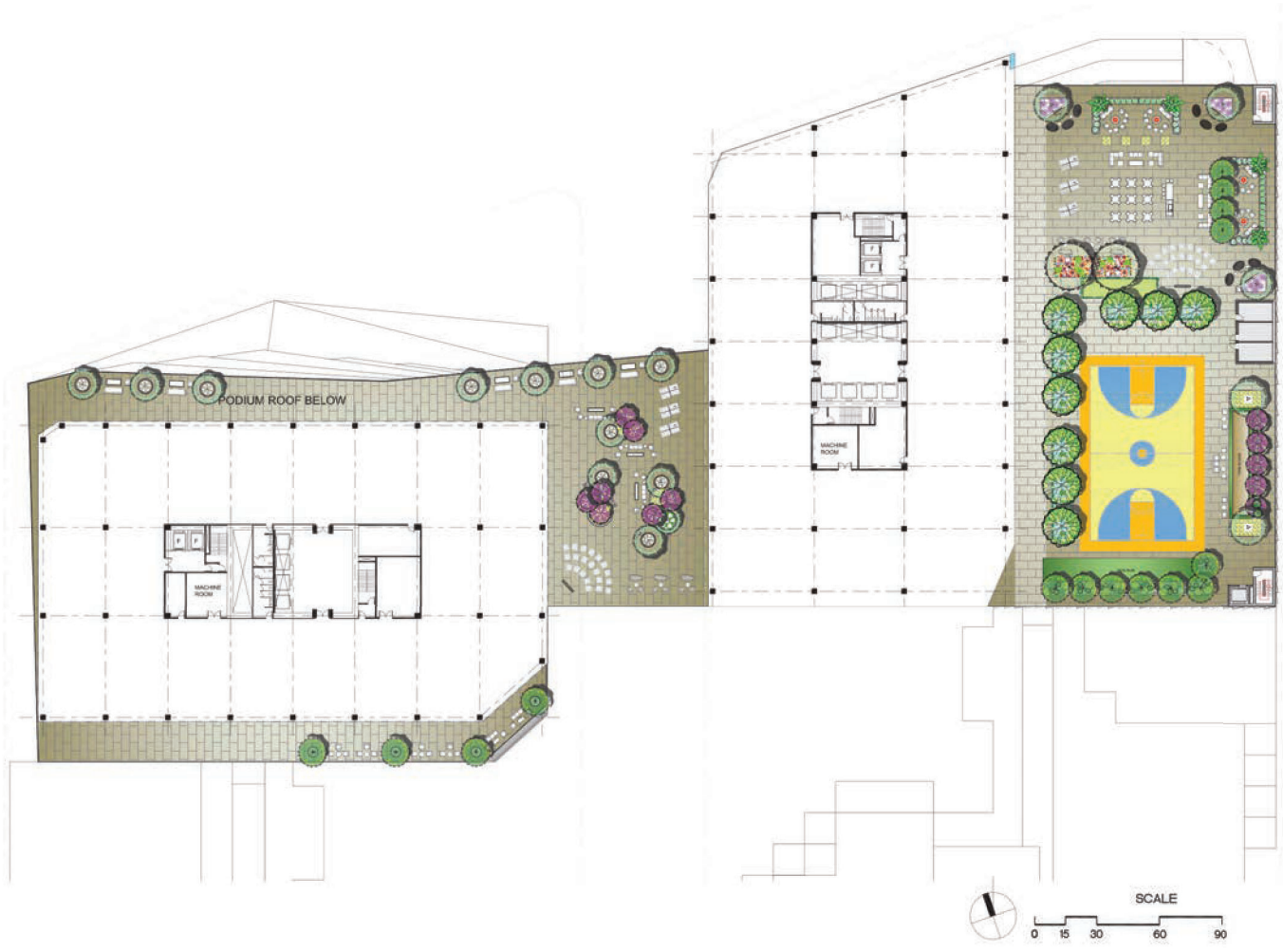
Vehicular access to the new above-grade parking levels as well as loading docks and trash areas would be provided via several driveways along South Curson Avenue and South Masselin Avenue. Existing vehicular access to the subterranean parking levels would be maintained along South Curson Avenue, Courtyard Place, and South Masselin Avenue. Pedestrian access to the office and retail uses would be provided via several entrances along the perimeter of the Project Site and Courtyard Place.

The Project would provide a total of 2,901 new vehicular parking spaces within seven above-grade parking levels. The Project would remove a portion of the existing subterranean parking containing 954 spaces and would renovate the remaining parking area retaining 1,584 spaces for a total of 4,650 spaces. The Project would also provide 340 bicycle parking spaces, including 106 short-term spaces and 234 long-term spaces on the ground floor. Furthermore, the Project would comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking areas.

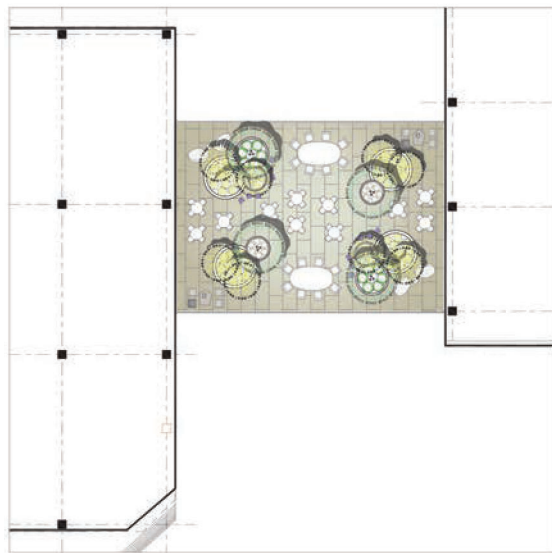
### **3.3.5 Lighting and Signage**

Exterior lighting would incorporate low-level exterior lights on the buildings and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the site. Project lighting would be designed to minimize light trespass from the Project Site and would comply with all LAMC requirements. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would require approval from the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on sidewalks and roadways while minimizing light and glare on adjacent properties.

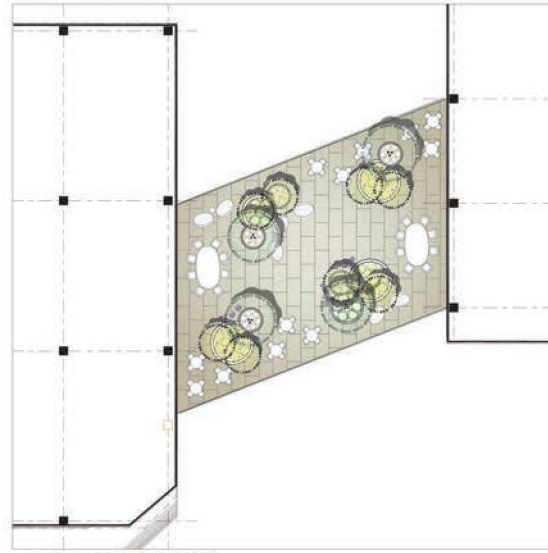
Proposed signage would be designed to be aesthetically compatible with the existing and proposed architecture of the Project Site and would comply with the requirements of the LAMC. Proposed signage would include identity signage, building and tenant signage, and general ground level and way-finding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



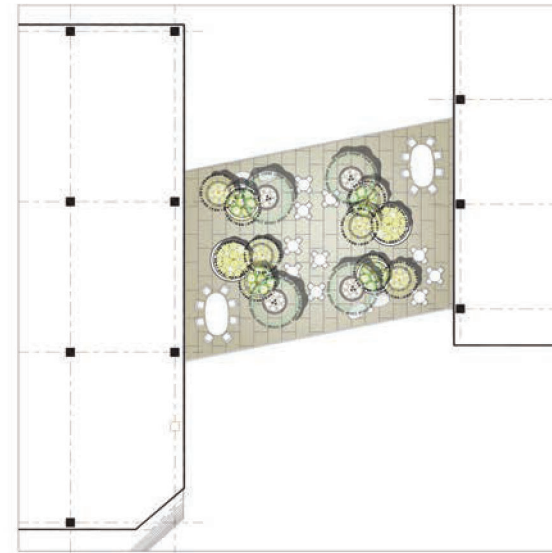
**Figure 7**  
Landscape/Open Space Plan—Podium Level



LEVEL 16 BALCONY



LEVEL23 BALCONY



LEVEL32 BALCONY



**Figure 8**  
Landscape/Open Space Plan—Levels 16, 23, and 32

### **3.3.6 Floor Area Ratio (FAR) and Setbacks**

As discussed above, the Project Site is designated as Regional Commercial and the northern 150 feet of the Project Site is zoned [Q]C4-2-CDO, and the remaining portion is zoned [Q]C4-1-CDO. The Project Site is subject to certain [Q] development conditions pursuant to a zone change granted by the City in 1985 for the development of the existing office complex. The Project requests approval of Zone and Height District Change to (Q)C2-2-CDO which would remove the existing [Q] conditions and permit the proposed height and a maximum of 6:1 FAR permitted for Height District 2. Based on a buildable area of 390,092 square feet of lot area, up to 2,340,552 square feet of floor area would be permitted. The Project would provide a total of 2,340,552 square feet of floor area (6:1 FAR). As set forth in LAMC Section 12.14, there is no setback requirement for commercial uses for the front yard, side yard, or rear yard.

### **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 northern portion of the two existing office buildings. This phase would be followed by limited excavation activities associated with the installation of building footings. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. It is estimated that approximately 7,055 cubic yards of export would be hauled from the Project Site. Project construction is anticipated to begin in 2025 with completion by 2028.

## **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 [Q]C4-2-CDO and [Q]C4-1-CDO to (Q)C2-2-CDO, and including reduced parking per LAMC Section 12.32-P;
- 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 W.1, Master Conditional Use Permit to allow for the sale of a full line of alcoholic beverages in conjunction with restaurants and a grocery store;
- Pursuant to LAMC 13.08 E, Design Plan Approval for compliance with the Miracle Mile Community Design Overlay (CDO);
- Pursuant to 17.15, a Vesting Tentative Tract Map for the merger and resubdivision of 39 lots into 2 ground lots, 2 airspace lots, for commercial condominium purposes, merger of excess right-of-way, and haul route approval.
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, haul route approval, 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) §21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” PRC Section 21099 defines a “transit priority area” as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21099 defines an “employment center project” as “a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099 defines an “infill site” as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.*

*The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that “visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA.”<sup>5</sup>*

*PRC Section 21099 applies to the Project. Specifically, pursuant to PRC Section 21099, the Project is an employment center project that would be located on an infill site within a transit priority area. The Project is considered an employment center project because it is located on property that is zoned to permit commercial uses with a maximum FAR greater than 0.75. In addition, the Project Site is located on an infill site, as that term is defined in PRC Section 21099(a)(4), because the Project Site includes lots located within an urban area that has been previously developed. Lastly, the Project Site is 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.” In particular, the Project Site is well served by a variety of public transit options along Wilshire Boulevard provided by Los Angeles County Metropolitan Transportation Authority (Metro), the Los Angeles Department of Transportation (LADOT), and the Antelope Valley Transit Authority (AVTA). Specifically, transit options in the vicinity of the Project Site*

---

<sup>5</sup> 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, <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>, accessed April 29, 2020.

include Metro bus line 20, DASH Fairfax, and AVTA bus line 786. 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. Therefore, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment and do not have to be evaluated under CEQA.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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.<sup>6</sup> 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.

As discussed in Section 3, Project Description, of this Initial Study, the Project Site is bound by Wilshire Boulevard to the north, Masselin Avenue to the east, West 8th Street to the south, and South Curson Avenue to the west. The Project Site is currently occupied by two six-story primarily office buildings with ground floor commercial uses. The Project Site is bisected by an asphalt paved cul-de-sac, Courtyard Place. The existing buildings on the Project Site are not listed on the National Register of Historic Places,

<sup>6</sup> City of Los Angeles, 2006 L.A. CEQA Thresholds Guide, page A.2-1

the California Register of Historical Resources, or as a County of Los Angeles Landmark or City of Los Angeles Historic-Cultural Monument. Therefore, the buildings would not be considered visual resources for purposes of this analysis. Uses located adjacent to the Project Site include: The Screen Actors Guild–American Federation of Television and Radio Artists building to the north; a 27-story office building, a four-story above grade parking structure, and Oakwood Miracle Mile apartments to the east; one- to two-story residential buildings to the south; and two- to three-story residential buildings, a three-story office building, and ancillary surface parking to the west. Off-site visual resources include:

- Hancock Park, a public park bordered by 6th Street and Wilshire Boulevard to the north and south and Curson Avenue and the vacated Ogden Drive to the east and west. Hancock Park is located northwest of the Project Site, across Wilshire Boulevard.
- NHM La Brea Tar Pits & Museum, a museum located in Hancock Park, adjacent to the La Brea Tar Pits, which is a potential historical resource.
- The distant Hollywood Hills to the north of the Project Site.
- The Mutual Benefit Life Plaza (5900 Wilshire Boulevard), a high-rise office building located on the southeast corner of Wilshire Boulevard and Ogden Drive, which is a potential historical resource.
- 5850 Wilshire Boulevard, a three-story office building on the southwest corner of Wilshire Boulevard and Stanley Avenue, which is a potential historical resource.
- Arthur Murray Dance Studio, a potential historical resource located on the southeast corner of Wilshire Boulevard and Stanley Avenue.
- The Hancock Park Building, a six-story office building on Wilshire Boulevard between Curson Avenue and Stanley Avenue, which is a potential historical resource.
- The Craft and Folk Art Museum, a potential historical resource located on Wilshire Boulevard between Curson Avenue and Stanley Avenue.
- Western Auto Parts, a two-story commercial building on Wilshire Boulevard between Masselin Avenue and Hauser Boulevard, which is a potential historical resource.

Panoramic views of visual resources (e.g., the Hollywood Hills) are limited due to the predominantly flat terrain of the Project area and the relatively dense, intervening development that blocks such long-range, expansive views. Focal views closer to the Project Site of the identified visual resources are also usually substantially blocked by adjacent development unless the viewer is positioned directly adjacent to the resource. In particular, views across or through the Project Site of visual resources are not available due to the existing development on the Project Site. In addition, as discussed in Section 3, Project Description, of this Initial Study, Project development would be confined to the existing Project Site boundaries and would not include new public right-of-way or adjacent property, which may interfere with views of visual resources in the vicinity of the Project Site. Overall, due to the highly urbanized and built out surroundings, development of the Project would not substantially or adversely affect a scenic vista. No impacts would occur, and no mitigation measures are required. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impact would not be considered a significant impact on the environment. No further evaluation of this topic is required.

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

**No Impact.** The Project Site is not located along a state scenic highway. The nearest officially eligible (not yet designated) state scenic highway is along California State Route 1 (SR-1), approximately 7 miles southeast of the Project Site.<sup>7</sup> Thus, the Project would not substantially damage scenic resources within a designated state scenic highway as there are no scenic highways along the Project Site. However, the portion of Wilshire Boulevard between Fairfax Avenue and Sycamore Avenue, which includes the Project Site, is a City of Los Angeles-designated scenic highway.<sup>8,9</sup> Notwithstanding, as noted above, development of the Project would occur within the boundaries of the existing Project Site and would not interfere with the existing scenic properties of Wilshire Boulevard. Therefore, no impact would occur, and no mitigation measures are required. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impacts would not be considered a significant impact on the environment. No evaluation of this topic is required.

Although not within a state scenic highway, historic buildings are located adjacent to the Project Site. As discussed below in Checklist Section V, Cultural Resources, impacts with respect to historical resources will be evaluated in the EIR.

**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.

With regard to zoning, as discussed in Section 3, Project Description, of this Initial Study, the northern 150 feet of the Project Site is zoned [Q]C4-2-CDO, and the remaining portion is zoned [Q]C4-1-CDO. The Project Site is subject to certain [Q] development conditions pursuant to a zone change granted by the City in 1985 for the development of the existing office complex. Pursuant to the LAMC, the C4 Zone permits C2 (commercial) uses with limitation, R4(multiple dwelling) uses, office, retail, and hotel uses. The Project would retain and renovate the southern portion of the existing buildings, demolish the northern portion of the two existing office buildings comprised of 586,275 square feet, and construct new office uses and ground floor commercial space. These proposed uses would be consistent with the types of uses permitted in the C4 Zone, which include commercial, office, residential, retail, and hotel uses.

The "CDO" designation indicates that the Project Site is located within the boundaries of the Miracle Mile Community Design Overlay District (CDO), which provides guidance and direction in the design of new and rehabilitation of existing buildings and storefronts in order to improve the appearance, enhance the identity, and promote the pedestrian environment of the district. The CDO provides guidelines and

---

<sup>7</sup> Caltrans, Scenic Highways, *List of eligible and officially designated State Scenic Highways (XLSX)*, accessed May 6, 2020.

<sup>8</sup> City of Los Angeles General Plan, Mobility Plan 2035, September 7, 2016, Appendix B, p. 172.

<sup>9</sup> Wilshire Community Plan, September 19, 2001, p. III-34.

standards for elements, such as site planning, architectural treatment, roof lines, building articulation, parking, entry treatment, ground floor lighting, and landscape. The Project's general consistency with the relevant design principles and guidelines of the City's Miracle Mile CDO District regarding scenic quality is analyzed in Table 2 on page 29. As outlined therein, the Project would specifically contribute to the Miracle Mile CDO District goals by promoting a development that preserves and enhances the physical appearance of the corridor and includes a development with a high degree of design quality. The Project would contribute to the achievement of these goals by providing for the development of two new high-rise office towers that would be comparable in scale and character to buildings in the vicinity of the Project Site. In addition, the design of the Project would generally not conflict with relevant design guidelines and standards of the Miracle Mile CDO District, as detailed in Table 2.

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 (Framework Element), the Wilshire Community 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). As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with two six-story primarily office buildings with ground floor commercial uses and three levels of subterranean parking below the buildings. The Project would enhance the built environment in the surrounding neighborhood and upgrade the quality of development by constructing two new high-rise office towers along Wilshire Boulevard while renovating the southern portion of the existing buildings. Additionally, the Project would remove existing landscaping and portions of existing parking and would enhance the streetscape adjacent to the Project Site by developing an active ground floor commercial space; installing new landscaping, including new street trees, outdoor dining seating, and raised planters; and providing new courtyards, exterior terraces, and walkways to connect the proposed buildings. The Project would utilize similar massing and materials as adjacent structures and would feature materials such as aluminum, glass, and metal. 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 ground floor of the office towers would contain commercial spaces that could include grocery, restaurant, and fitness uses; an office lobby; a landscaped courtyard and streetscape; and bicycle parking that is conveniently accessible from South Curson Avenue and Masselin Avenue.

The ground level open space amenity areas would include two activated courtyard plazas along the Project Site's Wilshire Boulevard streetscape fronting proposed restaurant and grocery market spaces with outdoor dining and landscaped seating area. The existing interior center courtyard plaza bisecting the buildings would be renovated and activated with outdoor shaded and nonshaded dining seating, lounge areas, ping-pong tables, and landscaping. 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.

**Table 2**  
**Applicable Design Principles and Guidelines of the Miracle Mile Community Design Overlay District**

Goals and Guidelines	Would the Project Conflict
<b>Design Principles</b>	
<p><b>Consistency:</b> The Miracle Mile CDO features a mixture of development types including high-rise office towers, large-scale commercial development, neighborhood serving retail, nighttime entertainment venues, and regionally significant museums. Design of these structures has been influenced by use, age, and site dimensions. Within the context of these constraints, developments can achieve the principle of consistency through selection of colors, exterior surface materials, landscaping and sign programs.</p>	<p><b>No Conflict:</b> The Project would continue the development trend along the Miracle Mile through the development of two new high-rise office towers. The Project would feature a contemporary architectural style that includes architectural elements already found on the Project Site and in the surrounding neighborhood. Specifically, proposed buildings would be designed to emphasize transparency, would elicit the feeling of openness and approachability from all sides, and would complement adjacent structures through the utilization of similar massing and material cues. Additionally, the Project would feature materials such as aluminum, glass, and metal similar to other high-rise office towers in the Miracle Mile. Landscaping and signage would also be compatible with the surrounding area.</p>
<b>Guidelines—Site Planning</b>	
<p><b>Guideline 1:</b> Orient buildings towards Wilshire Boulevard and adjacent cross-streets in order to encourage pedestrian activity along the sidewalks of the Miracle Mile and facilitate pedestrian access to and from the sidewalk to adjacent properties.</p>	<p><b>No Conflict:</b> The proposed office towers would be oriented towards Wilshire Boulevard and would be designed with ground floor commercial spaces and courtyards with seating and shade that would create greater openness and permeability at the ground level. 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 environment.</p>
<p><b>Guideline 2:</b> Provide easy sidewalk access to pedestrians by locating vehicle access and loading areas where there will be minimal physical or visual impact on pedestrians, the flow of traffic, and/or adjacent uses.</p>	<p><b>No Conflict:</b> Vehicular access to the new above-grade parking levels as well as loading docks and trash areas would be provided via several driveways along Curson Avenue and Masselin Avenue. Existing vehicular access to the subterranean parking levels would be maintained along Curson Avenue, Courtyard Place, and Masselin Avenue. Pedestrian access to the office and retail uses would be provided via several entrances along the perimeter of the Project Site and Courtyard Place. As discussed further below, 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. Additionally, as discussed above, 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. Furthermore, 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.</p>
<p><b>Guideline 3:</b> Locate utilities, storage areas, mechanical equipment, fire alarms, sprinklers and other service areas so that they are not visible from the public right-of-way.</p>	<p><b>No Conflict:</b> The Project would construct all utilities underground. No new utility infrastructure for the Project would be placed above ground. In addition, mechanical equipment and other service areas would be located within the office towers and/or parking structure and would not be visible from Wilshire Boulevard.</p>

**Table 2 (Continued)**  
**Applicable Design Principles and Guidelines of the Miracle Mile Community Design Overlay District**

Goals and Guidelines	Would the Project Conflict
<b>Guidelines—Architecture</b>	
<p><b>Guideline 1:</b> Reduce the monotony of large buildings by breaking architectural elements into smaller pedestrian scale components or through use of varied materials, textures or colors, trim, roof lines, canopies and awnings in order to provide variation and visual interest.</p>	<p><b>No Conflict:</b> The Project would be designed with ground floor commercial spaces and courtyards with seating that would create greater openness and permeability at the ground level. Architectural elements that emphasize transparency would elicit the feeling of openness and approachability from all sides. In particular, several internal open-air terraces would be provided throughout the towers that would serve to break up the buildings. The proposed office towers would also be located perpendicular to each other to break up the building massing.</p>
<p><b>Guideline 2:</b> Maintain building openings that enhance building design and continuity, as well as the pedestrian experience.</p>	<p><b>No Conflict:</b> As described above, the Project would be designed to promote openness and permeability at the ground level by providing visible ground floor commercial spaces and courtyards with seating and shade. Throughout the office towers would be open-air terraces that would extend the openness of the buildings from the ground level through the upper levels of the buildings.</p>
<p><b>Guideline 3:</b> Construct a dominant Wilshire Boulevard entryway to reinforce the character of the building, add visual interest, break up the monotony of flat surfaces, add a vertical element to break up the facade of the building and create an inviting entrance.</p>	<p><b>No Conflict:</b> Refer to the consistency analysis for Architectural Guidelines 1 and 2. In addition, the proposed office towers would be oriented towards Wilshire Boulevard to create a dominant Wilshire Boulevard entryway.</p>
<p><b>Guideline 4:</b> Design new buildings to achieve consistency by creating continuity between the heights of adjacent roofs, parapets, and cornices.</p>	<p><b>No Conflict:</b> As previously noted, the Project would continue the development trend along the Miracle Mile through the development of two new high-rise office towers. The proposed office towers, which would range from 35 to 41 stories, would be compatible with other high-rise office buildings located along Wilshire Boulevard, including the 31-story building at 5900 Wilshire Boulevard. The proposed towers would be connected by many tiers of sky bridges above that break up and link the buildings and the façades of the above-grade parking that would embrace a pattern of horizontal fins cascading an iconic form on the skyline and transform into canopies and at the street level. Overall, the proposed buildings would be designed to complement adjacent structures through the utilization of similar massing and material cues.</p>
<p><b>Guideline 5:</b> Select building materials to reduce building mass, create visual interest, and complement the existing historic resources of the Miracle Mile.</p>	<p><b>No Conflict:</b> Refer to the consistency analysis for Architectural Guidelines 1 and 2. In addition, the proposed buildings would be designed to emphasize transparency would elicit the feeling of openness and approachability from all sides and would complement adjacent structures through the utilization of similar massing and material cues. Additionally, the Project would feature materials such as aluminum, glass, and metal similar to other high-rise office towers in the area. Landscaping and signage would also be compatible with the surrounding area.</p>
<p><b>Guideline 6:</b> Add visual interest and create a feeling of openness by incorporating windows</p>	<p><b>No Conflict:</b> Refer to the consistency analysis for</p>

**Table 2 (Continued)**

**Applicable Design Principles and Guidelines of the Miracle Mile Community Design Overlay District**

Goals and Guidelines	Would the Project Conflict
with architectural defining features such as window frames, sashes, muntins, glazing, paneled or decorated jambs and moldings.	Architectural Guidelines 1 and 2.
<b>Guideline 8:</b> Use a color palette which complements adjacent buildings and promotes the Art Deco identity of the Miracle Mile.	<b>No Conflict:</b> Characteristic of other high-rise office towers in the area, the proposed office towers would not utilize bright or intense colors and would be constructed of glass, metal, and aluminum, which is consistent with nearby contemporary high rise office development in the Miracle Mile.
<b>Guideline 10:</b> Incorporate lighting into the design not only to accentuate architectural features, but to provide a safe environment for pedestrian activity.	<b>No Conflict:</b> Security and wayfinding lighting would be incorporated throughout the Project Site, including along the perimeter of the office towers.
<b>Guidelines—Parking</b>	
<b>Guideline 2:</b> Integrate a parking structure into the overall design of a development through compatible materials, color and architectural defining features.	<b>No Conflict:</b> The proposed parking structure would be integrated with the office towers and would feature compatible materials, colors, and architectural defining features to unify the various uses.
<b>Guidelines—Landscaping</b>	
<b>Guideline 2:</b> Landscape the areas surrounding a building including site entrances, walkways and parking lots with small trees, planter boxes and tubs of flowers.	<b>No Conflict:</b> A variety of landscaping would be incorporated throughout the Project Site, including building entrances and along walkways.
<b>Guidelines—Signage</b>	
<b>Guideline 1:</b> Design signage which is incorporated into the overall design of a building and complements the facade or architectural element on which it is placed.	<b>No Conflict:</b> Project signage would include new identification signage and general ground level and wayfinding pedestrian signage. On-site signage would be designed to be aesthetically compatible with the proposed architecture on the Project Site and with the existing architecture in the surrounding area. Furthermore, the Project would not include electronic signage or signs with flashing, mechanical, or strobe lights.
<b>Guideline 3:</b> Design projecting signs, which are compatible with the historical context of the Miracle Mile and improve the overall appearance of the area.	<b>No Conflict:</b> Refer to the consistency analysis for Signage Guideline 1.
<b>Guideline 5:</b> Signs which direct vehicular and pedestrian traffic to parking areas or other on-site destinations or explain parking fees should not exceed nine (9) square feet or a vertical or horizontal dimension of thirty-six (36) inches, and should be consistent in design with the signage for the rest of the project.	<b>No Conflict:</b> Wayfinding signs and parking information signs would not exceed nine square feet or a vertical or horizontal dimension of 36 inches. Refer to the consistency analysis for Signage Guideline 1.
<p>_____</p> <p><i>Source: Eyestone Environmental, 2021.</i></p>	



## **Wilshire Community Plan**

The Project would be consistent with the Wilshire Community Plan's aesthetics-related objectives and policies. Specifically, with regard to Objective 2-3 to enhance the visual appearance and appeal of commercial districts, the Project would renovate the existing Project Site by constructing two new high-rise office towers along Wilshire Boulevard that would be compatible with other high-rise office towers in the area while renovating the southern portion of the Project Site. Along Wilshire Boulevard, the Project would include pedestrian courtyards with seating and shading.

In addition to the objectives included in the Wilshire Community Plan, the Wilshire Community Plan contains an Urban Design Chapter that includes general policies that establish the minimum level of design that should be observed in the Wilshire Community Plan area. The Project would not conflict with the relevant policies included in the Urban Design Chapter of the Community Plan. Specifically, with regard to commercial site planning, the Project would be oriented toward Wilshire Boulevard and would enhance the pedestrian experience by enhancing the openness of the site at the ground level landscaped courtyards and outdoor dining opportunities. In addition, all utilities would be placed underground and mechanical and electrical equipment and trash areas would be screened from public view. With regard to height and building design, the design elements discussed above would ensure that the Project would be harmonious with the surrounding neighborhood and create a stable environment with a pleasant character. Lighting and signage would also be incorporated in an appropriate and attractive way.

With regard to parking structures and surface parking areas, the proposed parking structure would be integrated as part of the office towers and would be designed to be compatible with the surrounding uses. This would be achieved through the incorporation of building articulation, compatible finish materials, and compatible height and massing. Regarding light and glare, on-site lighting would be provided along pedestrian walkways and vehicular access ways. The Project would have well-lit entries and exterior frontages. Project lighting would be designed to minimize light trespass from the proposed buildings and overall Project Site. Finally, the Community Design and Landscape Guidelines included in the Urban Design Chapter of the Wilshire Community Plan are intended to improve the environment both aesthetically and physically, via public improvements that affect public spaces and rights-of-way. The pedestrian environment along Wilshire Boulevard and throughout the Project Site would be enhanced as part of the Project design, which would emphasize transparency and elicit the feeling of openness and approachability from all sides, including Wilshire Boulevard. Landscaping along Wilshire Boulevard would be attractive and appropriate.

## **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 spaces 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 new above-grade parking levels as well as loading docks and trash areas would be provided via several driveways along Curson Avenue and Masselin Avenue. Existing vehicular access to the subterranean parking levels would be maintained along Curson Avenue, Courtyard Place, and Masselin Avenue. Pedestrian access to the office and retail uses would be provided via several entrances along the perimeter of the Project Site and Courtyard Place. 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 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 Wilshire Community Plan area. The area surrounding the Project Site is developed primarily with a mix of mid- to high-rise, high-density commercial, office, and residential uses. Land uses located adjacent to the Project Site include: the Screen Actors Guild–American Federation of Television and Radio Artists building to the north; a 27-story office building, a four-story above grade parking structure, and Oakwood Miracle Mile apartments to the east; one- to two-story residential buildings to the south; and two- to three-story residential buildings, a three-story office building, 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 buildings would be designed to complement adjacent structures through the utilization of similar massing and material cues. The Project would feature materials such as aluminum, glass, and metal similar to other high-rise office towers in the area. In addition, the Project would incorporate exterior terraces and a podium, which would be designed connect the two high-rise office towers. 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 space and installing landscaping, including new street trees, 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 two high-rise office towers with ground floor commercial space. 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 subterranean parking areas. Landscaping within the Project Site includes several trees and grasses within small planter areas. As discussed further below, construction of the Project would involve the removal of 52 trees, including 30 onsite trees and 22 street trees. However, in accordance with City standards, the onsite trees to be removed would be replaced at a 1:1 basis and street trees to be removed would be replaced on a 2:1 basis.

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. No impacts would occur, and no mitigation measures are required. Moreover, pursuant to SB

743 and ZI No. 2452, the Project's aesthetics impact would not be considered a significant impact on the environment. 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.** The Project Site currently generates moderate levels of light from interior light spillage from buildings, security lighting, and vehicle headlights in the surface parking areas. Existing glare sources within the Project Site include glass, architectural elements, and vehicle headlights. The Project Site is in an urbanized area and is surrounded by urban infrastructure, street lighting, and low-, mid-, and high-rise buildings with sources of daytime and nighttime light and glare. The Project would introduce new sources of light and glare that are typically associated with office and commercial buildings, including architectural, interior, security and wayfinding light sources.

### **Construction**

The majority of Project construction would occur during daylight hours. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of Project construction. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. In addition, as part of the Project, construction lighting would be shielded to minimize light spillover. Construction lighting, while potentially bright, would be focused on the particular area undergoing work. Accordingly, uses that are not adjacent to the Project construction site would not be anticipated to be substantially affected by construction lighting.

Daytime glare would be transitory and short-term, given the movement of construction equipment and materials within the construction area, and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Furthermore, temporary construction fencing would be placed along the periphery of the Project Site to screen construction activity from view at the street level from off-site locations. Therefore, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur.

Based on the above, light and glare associated with temporary Project-related construction activities would not create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area. No impacts would occur, and no mitigation measures are required. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impacts would not be considered significant. No further evaluation of this topic in an EIR is required.

### **Operation**

Lighting on the Project Site would include low-level interior lighting adjacent to buildings, parking structures, and along pathways for security and wayfinding purposes. In addition, lighting to accent signage, architectural features, and landscaping elements would be installed throughout the Project Site. Digital signage is not proposed. Other signage would be illuminated by means of low-level external lighting, internal halo lighting, or ambient light. These lighting sources would be similar to other lighting sources already within the Project Site and in the vicinity of the Project Site and would not generate

artificial light levels that are out of character with the surrounding area. Illumination used for Project signage would be limited in light intensity to avoid negative lighting impacts to the nearest residentially zoned property. In addition, on-site exterior lighting would be shielded or directed toward the areas to be lit to limit light spillover onto off-site uses and would meet all applicable lighting standards under the LAMC. Project lighting would also comply with regulatory requirements, including the requirements 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.

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. Sun reflection from the Project buildings 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 aluminum. 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. Limited nighttime glare could result from illuminated signage and from vehicle headlights. Headlights from vehicles entering and exiting the parking structure would be visible during the evening and nighttime hours, and such lighting sources would be typical for the area.

Based on the above, with adherence to regulatory requirements, Project operation would not create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area. No impacts would occur, and no mitigation measures are required. Moreover, pursuant to SB 743 and ZI No. 2452, the Project’s light and glare impact cannot 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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 of Los Angeles. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with office and ground floor commercial uses and subterranean parking. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. Further, the Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.<sup>10</sup> 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.** As discussed in Section 3, Project Description, of this Initial Study, the northern 150 feet of the Project Site is zoned [Q]C4-2-CDO, and the remaining portion is zoned [Q]C4-1-CDO. The Project Site is subject to certain [Q] development conditions pursuant to a zone change granted by the City in 1985 for the development of the existing office complex. 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.<sup>11</sup> Therefore, the Project would not conflict

<sup>10</sup> City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APN 5089008031 <http://zimas.lacity.org/>, accessed April 29, 2020.

<sup>11</sup> California Department of Conservation, The Williamson Act Status Report 2016–17, [www.conservation.ca.gov/dlrp/wa/Documents/stats\\_reports/2018%20WA%20Status%20Report.pdf](http://www.conservation.ca.gov/dlrp/wa/Documents/stats_reports/2018%20WA%20Status%20Report.pdf), accessed May 1, 2020.

with any zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**No Impact.** As previously discussed, the Project Site is located in an urbanized area and is currently developed with office and ground floor commercial uses and subterranean parking. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned for commercial uses and is not zoned for forest land and is not used as forest land.<sup>12</sup> Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the Public Resources Code. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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

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

**No Impact.** As discussed above, the Project Site is located in an urbanized area of the City of Los Angeles and does not include farmland or forest land. Further, the Project Site and surrounding area are 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.<sup>13</sup> 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.*

---

<sup>12</sup> City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APN 5089008031, <http://zimas.lacity.org/>, accessed April 29, 2020.

<sup>13</sup> City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APN 5089008031, <http://zimas.lacity.org/>, accessed April 29, 2020.

	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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**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<sub>2.5</sub>], and lead<sup>14</sup>). 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.<sup>15</sup> 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. Construction and operation of the Project would result in an increase in stationary and mobile source air emissions. As a result, development of the Project could have a potential adverse effect on SCAQMD’s implementation of the AQMP. Therefore, the EIR will provide further analysis of the Project’s consistency with SCAQMD’s AQMP.

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

<sup>14</sup> Partial Nonattainment designation for lead for the Los Angeles County portion of the Basin only.

<sup>15</sup> SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.



**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<sub>2.5</sub> and lead, and State air quality standards for ozone, particulate matter less than 10 microns in size (PM<sub>10</sub>), and PM<sub>2.5</sub>. 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 uses. Therefore, the Project could expose sensitive receptors to additional pollutant concentrations and the EIR will provide further analysis of the Project's potential to result in substantial adverse impacts to sensitive receptors.

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

**Less Than Significant Impact.** No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve the operation of uses typically associated with odor complaints. 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 comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.<sup>16</sup> 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.<sup>17</sup>

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

---

<sup>16</sup> SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, [www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust](http://www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust), accessed May 13, 2020.

<sup>17</sup> SCAQMD, Rule 402, Nuisance, adopted May 7, 1976.

## 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

**No Impact.** The Project Site is located in an urbanized area and is currently developed with two six-story primarily office buildings with ground floor commercial uses and three levels of subterranean parking. Landscaping within the Project Site includes 191 trees, grasses, hedges, and shrubs. The southern portion of the Project Site fronting 8th Street is improved with open space to a depth of approximately 80 feet that includes pedestrian walkways, seating areas, playground, water feature, landscaping, and trees.

Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings. Based on the lack of habitat on the Project Site, it is unlikely any special status species listed by the California Department of Fish and Wildlife (CDFW)<sup>18</sup> or by the U.S. Fish and Wildlife Service (USFWS)<sup>19</sup> would be present on-site. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City of Los Angeles.<sup>20</sup> Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW or USFWS. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

**No Impact.** The Project Site is located in an urbanized area and is currently developed with two six-story primarily office buildings with ground floor commercial uses and three levels of subterranean parking. No riparian or other sensitive natural community exists on the Project Site or in the surrounding area.<sup>21,22</sup> Furthermore, the Project Site and surroundings are not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.<sup>23,24</sup> In addition, there are no other sensitive natural communities identified by the CDFW or the USFWS.<sup>25,26,27</sup> 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?**

---

<sup>18</sup> California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, August 2019.

<sup>19</sup> United States Fish and Wildlife Service, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, <https://ecos.fws.gov/ecp0/reports/ad-hoc-species-report>, accessed May 4, 2020.

<sup>20</sup> 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.

<sup>21</sup> City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APN 5089008031, <http://zimas.lacity.org/>, accessed April 29, 2020.

<sup>22</sup> United States Environmental Protection Agency, NEPAAssist, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, accessed May 4, 2020.

<sup>23</sup> 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.

<sup>24</sup> Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

<sup>25</sup> California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), <https://map.dfg.ca.gov/bios/>, accessed May 4, 2020.

<sup>26</sup> California Department of Fish and Wildlife, CDFW Lands, <https://map.dfg.ca.gov/lands/>, accessed May 4, 2020.

**No Impact.** As discussed above, the Project Site is located in an urbanized area and is currently developed with two six-story primarily office buildings with ground floor commercial uses and three levels of subterranean parking. No water bodies or state and federally protected wetlands exist on the Project Site.<sup>28</sup> 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.

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

**Less Than Significant Impact.** As described above, the Project Site is located in an urbanized area and is currently developed with two six-story primarily office buildings with ground floor commercial uses and three levels of subterranean parking. In addition, the areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within and surrounding the Project Site that provide linkages to natural open spaces areas which may serve as wildlife corridors. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.<sup>29,30</sup>

According to the Tree Survey prepared for the Project by Tree Case Management, Inc. included in Appendix IS-1 of this Initial Study, there are a total of 191 trees within the Project Site and 35 street trees adjacent to the Project Site. None of the trees within the Project Site are considered protected species by the City. As part of the Project, 52 trees would be removed. Trees to be removed could potentially provide nesting sites for migratory birds. The Project would comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, of any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish & Game Code Section 3503 (Section 3503) states that “[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.” No exceptions are provided in the code and the CDFW has not promulgated regulations interpreting these provisions. In compliance with the Migratory Bird Treaty Act and California Fish and Game Code, the Project would involve scheduling tree removal activities 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. Therefore, with compliance with the Migratory Bird Treaty Act, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Impacts would be

---

<sup>27</sup> United States Fish and Wildlife Service, National Wetlands Inventory, [www.fws.gov/wetlands/data/Mapper.html](http://www.fws.gov/wetlands/data/Mapper.html), accessed May 4, 2020.

<sup>28</sup> United States Environmental Protection Agency, NEPAassist, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, accessed May 4, 2020.

<sup>29</sup> 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.

<sup>30</sup> Department of Regional Planning, February 2015, Figure 9.3, Significant Ecological Areas and Coastal Resource Areas Policy Map.

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

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

**Less Than Significant Impact.** The City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least 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.

According to the Tree Survey prepared for the Project by Tree Case Management, Inc., included in Appendix IS-1 of this Initial Study, a total of 191 trees are located within the Project Site, including, but not limited to, 51 Mexican Fan Palm (*Washington robusta*) trees, 47 Queen Palm (*syagrus romanzoffiana*) trees, 35 Ficus (*Ficus microcarpa nitida*) trees, 27 Mediterranean Fan Palm (*Chameorops humilism multi*) trees. None of the trees within the Project Site are considered protected species by the City. There are also 35 street trees adjacent to the Project Site. As part of the Project, 52 trees would be removed, including 30 onsite trees and 22 street trees. In accordance with City standards, the on-site trees to be removed would be replaced on a 1:1 basis and street trees to be removed would be replaced on a 2:1 basis. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**No Impact.** As described above, the Project Site is located in an urbanized area and is currently developed with two six-story primarily office buildings with ground floor commercial uses and three levels of subterranean parking. As previously discussed, landscaping within the Project Site is limited, consisting of ornamental trees and shrubs and the Project Site does not support any habitat or natural community<sup>31,32</sup> No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.<sup>33</sup> Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No

---

<sup>31</sup> City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APN 5089008031, <http://zimas.lacity.org/>, accessed April 29, 2020.

<sup>32</sup> United States Environmental Protection Agency, NEPAAssist, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, accessed May 4, 2020.

<sup>33</sup> California Department of Fish and Wildlife, California Natural Community Conservation Plans, April 2019.

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

## V. CULTURAL RESOURCES

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

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

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

The Project Site does not include a historical resource. However, based on the HistoricPlacesLA database, there are multiple historical resources immediately surrounding the Project Site, including the California Federal Plaza Building (718 S. Masselin Avenue)<sup>34</sup> located east of the Project Site; the Craft and Folk Art Museum (5814 W. Wilshire Boulevard),<sup>35</sup> Hancock Park Building (5820 W. Wilshire

<sup>34</sup> Los Angeles Historic Resources Inventory, [www.historicplacesla.org/reports/3c0bbfef-00c7-487b-a2f8-e01b9903972f](http://www.historicplacesla.org/reports/3c0bbfef-00c7-487b-a2f8-e01b9903972f), accessed April 30, 2020.

<sup>35</sup> Los Angeles Historic Resources Inventory, [www.historicplacesla.org/reports/061d0730-0ae9-405d-87ef-2cd42fca63fa](http://www.historicplacesla.org/reports/061d0730-0ae9-405d-87ef-2cd42fca63fa), accessed April 30, 2020.

Boulevard),<sup>36</sup> and Arthur Murray Dance Studio (5828 W. Wilshire Boulevard)<sup>37</sup> all located west of the Project Site; and Museum Square (5779 W. Wilshire Boulevard)<sup>38</sup> located north of the Project Site. As such, the EIR will include an analysis of potential direct and indirect impacts to historical resources.

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

**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, the Project would require grading, limited excavation associated with the installation of building footings, and other construction activities that could have the potential to disturb existing but undiscovered archaeological resources. Thus, the Project could have the potential to disturb previously undiscovered archaeological resources. 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?**

**Less Than Significant Impact.** As discussed above, the Project Site is located within an urbanized area and has been subject to previous grading and development. Therefore, the potential for uncovering human remains on the Project Site is low. In addition, the Project would involve limited excavation activities associated with the installation of building footings and would not include subterranean parking. Nevertheless, if human remains were discovered during construction of the Project, work in the immediate vicinity of the area of the find would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determined the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the person or persons it believes to be most likely descended from the deceased Native American. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. Therefore, due to the low potential that any human remains are located on the Project Site, and because compliance with the regulatory standards described above would ensure appropriate treatment of any

---

<sup>36</sup> Los Angeles Historic Resources Inventory, [www.historicplacesla.org/reports/5d1a1c5f-9f2a-4797-b0f3-233159d6fc91](http://www.historicplacesla.org/reports/5d1a1c5f-9f2a-4797-b0f3-233159d6fc91), accessed April 30, 2020.

<sup>37</sup> Los Angeles Historic Resources Inventory, [www.historicplacesla.org/reports/ad48de7c-ca8a-4170-885a-b915901de4d4](http://www.historicplacesla.org/reports/ad48de7c-ca8a-4170-885a-b915901de4d4), accessed April 30, 2020.

<sup>38</sup> Los Angeles Historic Resources Inventory, [www.historicplacesla.org/reports/ae4f097c-7678-4d4f-80ac-421ec0f7ccec](http://www.historicplacesla.org/reports/ae4f097c-7678-4d4f-80ac-421ec0f7ccec), accessed April 30, 2020.

potential human remains unexpectedly encountered during grading and limited excavation activities, the Project’s impact related to human remains would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

## VI. ENERGY

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

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

**Potentially Significant Impact.** As discussed above, the Project Site is currently developed with office and ground floor commercial uses. The Project would retain and renovate the southern portion of the existing buildings and would demolish the northern portion of the two existing office buildings for the addition of approximately 1,923,837 square feet of new floor area consisting of 1,806,237 square feet of office uses and 117,600 square feet of ground floor commercial space. Due to the increased floor area and type of uses, the Project would generate an increased demand for electricity and natural gas services provided by the Los Angeles Department of Water and Power (LADWP) and the Southern California Gas Company, respectively. While development of the Project would not be anticipated to cause wasteful, inefficient, and unnecessary consumption of energy resources, further analysis of the Project’s demand on existing energy resources will be provided in the EIR.

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

**Potentially Significant Impact.** First established in 2002 under Senate Bill (SB) 1078, California’s Renewable Portfolio Standard required retail sellers of electric services to increase procurement from eligible renewable energy resources to 20 percent of total retail sales by 2017.<sup>39</sup> The program was accelerated in 2015 with SB 350 which mandated a 50 percent Renewable Portfolio Standard by 2030. In 2018, SB 100 was signed into law, which again increases the Renewable Portfolio Standard 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

<sup>39</sup> CPUC, California Renewables Portfolio Standard (RPS), [www.cpuc.ca.gov/rps/](http://www.cpuc.ca.gov/rps/), accessed March 4, 2020.



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.<sup>40</sup> 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 2017 national standards.<sup>41</sup>

As previously described, the Project Site is developed with office and ground floor commercial uses. In addition to the retention and renovation of the southern portion of the existing buildings, the Project would demolish the northern portion of the two existing office buildings for the addition of approximately 1,923,837 square feet of new floor area consisting of 1,806,237 square feet of office uses and 117,600 square feet of ground floor commercial space. The Project Site does not include any renewable energy sources used by LADWP. The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. While the Project would not be anticipated to conflict with or obstruct a state or local plan for renewable energy or energy efficiency, the Project’s compliance with LADWP’s plans for renewable energy as well as the Project’s compliance with California Building Energy Efficiency Standards will be further evaluated in the EIR.

## VII. GEOLOGY AND SOILS

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

Would the project:

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

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

<sup>40</sup> CEC, 2019 Building Energy Efficiency Standards, [www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency/](http://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency/), accessed March 4, 2020.

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The following analysis is based on the Geotechnical Engineering Investigation (Geotechnical Investigation) prepared for the Project by Geocon West, Inc., dated March 16, 2020. All specific information on geologic and soils conditions in the discussion below is from this report unless otherwise noted. This report is included as Appendix IS-2 of this Initial Study.

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

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

**Less Than Significant Impact.** Surface fault rupture occurs when movement on a fault breaks through to the earth's surface.<sup>42</sup> Based on criteria established by the California Geological Survey, faults can be classified as active, potentially active, or inactive. Active faults are faults that have historically produced earthquakes or shown evidence of movement within the past 11,000 years. Potentially active faults have demonstrated displacement within the last 1.6 million years. Inactive faults do not exhibit displacement

<sup>42</sup> California Department of Conservation, Alquist-Priolo Earthquake Fault Zones, [www.conservation.ca.gov/cgs/alquist-priolo](http://www.conservation.ca.gov/cgs/alquist-priolo), accessed May 13, 2020.

younger than 1.6 million years before the present. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

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

Based on a review of the Earthquake Fault Zones and Seismic Hazard Zones map prepared by the California Department of Conservation, the Project Site is not located within a fault zone.<sup>43</sup> Based on the City of Los Angeles General Plan Safety Element, the Project Site is not located within an Alquist-Priolo Special Studies Zone.<sup>44</sup> In addition, according to the Geotechnical Investigation, included in Appendix IS-2, of this Initial Study, based on research of available literature as well as results of site reconnaissance, no known active faults or potentially active faults with the potential for surface rupture underlie the Project Site. Therefore, as concluded in the Geotechnical Investigation, the potential for surface ground rupture at the Project Site is considered low. The Project also would not involve mining operations that require deep excavations thousands of feet into the earth, or boring of large areas, which could create unstable seismic conditions or stresses in the Earth's crust. Accordingly, the Project would not directly or indirectly cause potential substantial adverse effects involving the rupture of a known earthquake fault. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

## ii. Strong seismic ground shaking?

**Less Than Significant Impact.** The Project Site is located in the seismically active region of Southern California and would potentially be subject to strong seismic ground shaking if a moderate to strong earthquake occurs on a local or regional fault. As discussed above, no active faults are known to pass directly beneath the Project Site and the Project Site is not located in an Alquist-Priolo Earthquake Fault Zone. According to the Geotechnical Investigation, the closest active fault is the Newport–Inglewood Fault located approximately 1.9 miles west of the Project Site. State and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. Specifically, the State and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the City's General Plan Safety Element, and the Los Angeles Building Code. Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions thereof before permits can be issued for construction of the Project. Accordingly, the design and construction of the Project would comply with all applicable existing regulatory requirements, the applicable provisions of the Los Angeles Building Code relating to seismic safety, and the application of accepted and proven construction engineering practices. The Los Angeles Building Code incorporates current seismic design provisions of the 2019 California

---

<sup>43</sup> California Department of Conservation, California Geological Survey. *Earthquake Fault Zones and Seismic Hazards Zones Map, Hollywood 7.5 Minute Quadrangle*, November 6, 2014.

<sup>44</sup> Department of City Planning Los Angeles, Safety Element of the Los Angeles General Plan, Exhibit A—Alquist-Priolo Special Study Zones & Fault Rupture Study Areas in the City of Los Angeles, p. 47.

Building Code, with City amendments, to minimize seismic impacts. The 2019 California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of the Los Angeles Department of Building and Safety, including the recommendations provided in a final geotechnical report for the Project, which will be subject to review and approval by the Los Angeles Department of Building and Safety. Therefore, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

### iii. Seismic-related ground failure, including liquefaction?

**Less Than Significant Impact.** Liquefaction occurs when loose, saturated, granular soils lose their strength due to excess water pressure that builds up during repeated movement from seismic activity. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Factors that contribute to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking. The effects of liquefaction include the loss of the soil's ability to support footings and foundations which may cause buildings and foundations to buckle.

According to the California Department of Conservation's Earthquake Fault Zones and Seismic Hazard Zones Map for the Hollywood Quadrangle, the Project Site is not located within a liquefaction zone.<sup>45</sup> This determination is based on groundwater depth records, soil type, and distance to a fault capable of producing a substantial earthquake. The Safety Element of the Los Angeles City General Plan also indicates the Project Site is not located within a liquefiable area (recent alluvial deposits; groundwater less than 30 feet deep).<sup>46</sup> Also, according to the Geotechnical Investigation, the potential for liquefaction and associated ground deformations beneath the Project Site is considered remote. Therefore, with adherence to existing regulations and site-specific design recommendations, impacts related to liquefaction would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

### iv. Landslides?

**No Impact.** Landslides generally occur in loosely consolidated, wet soils and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and characterized by relatively level topography. According to the California Department of Conservation's Seismic Hazard Zones Map for the Hollywood Quadrangle, the Project Site is not located within an earthquake-induced landslide area.<sup>47</sup> Furthermore, the Los Angeles General Plan Safety Element does not map the Project Site in a landslide

---

<sup>45</sup> California Department of Conservation, California Geological Survey, *Earthquake Fault Zones and Seismic Hazards Zones Map, Hollywood 7.5 Minute Quadrangle*, November 6, 2014.

<sup>46</sup> Department of City Planning Los Angeles, Safety Element of the Los Angeles General Plan, Exhibit B—Areas Susceptible to Liquefaction in the City of Los Angeles, p. 49.

<sup>47</sup> California Department of Conservation, California Geological Survey, *Earthquake Fault Zones and Seismic Hazards Zones Map, Hollywood 7.5 Minute Quadrangle*, November 6, 2014.

area.<sup>48</sup> According to the Geotechnical Investigation, the probability of seismically-induced landslides occurring on the Project Site is considered low. Development of the Project also would not include altering the existing topography of the Project Site such that steep slopes would be introduced. As such, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** The Project Site is currently fully developed with buildings and subterranean parking. As such, there are no extensive open spaces with exposed topsoil. However, construction of the Project would require grading, limited excavation associated with the installation of building footings, and other construction activities that have the potential to disturb soils underneath the Project Site and expose these soils to rainfall and wind, which can result in soil erosion. However, this potential soil erosion would be reduced by the implementation of standard erosion controls 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, excavation, and fills. The Project would also be required to comply with the City's Low Impact Development (LID) ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Regarding soil erosion during Project operations, the potential is negligible since the Project Site would mostly remain fully developed, except for some landscaping located throughout the Project Site. However, the landscaping would include trees to prevent soil erosion. Therefore, with compliance with applicable regulatory requirements, impacts related to substantial soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

**Less Than Significant Impact.** As discussed above, the Project Site is not located near slopes or geologic features that would result in on- or off-site landsliding. Therefore, no impacts related to landslides would occur, and no mitigation measures are required.

Liquefaction-related effects include lateral spreading. As evaluated in the Geotechnical Investigation and discussed above, the Project Site is not susceptible to liquefaction and would not potentially result in lateral spreading. Impacts related to liquefaction and lateral spreading would be less than significant, and no mitigation measures are required.

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. No large scale extraction of groundwater, gas, oil or geothermal energy is occurring or planned at the Project Site or in the general vicinity of the Project Site.

---

<sup>48</sup> Department of City Planning Los Angeles, General Plan Safety Element, November 1996, Exhibit C, Landslide Inventory & Hillside Areas, p. 51.

Therefore, there is no potential for ground subsidence due to withdrawal of fluid or gas at the Project Site. Thus, no impacts related to subsidence would occur, and no mitigation measures are required.

Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events. According to the Geotechnical Investigation, the artificial fill underlying the Project Site consists of sandy clay that is characterized as moist and firm or loose. The alluvial deposits underlying the artificial fill consists of black silt and sandy silt with varying amounts of gravel that is characterized as moist to wet and stiff to hard or dense to very dense. Due to the type and density of the soils underlying the Project Site, the Project Site soils would not be considered collapsible soils. Therefore, the Project Site is not located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in collapse. As such, no impacts associated with collapsible soils would occur, and no mitigation measures are required.

Based on the above, the Project would not cause a geologic unit or soil to become unstable. 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 expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**

**Less Than Significant Impact.** Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. Due to high clay content, expansive soils expand with the addition of water and shrink when dried, which can cause damage to overlying structures. As provided in the Geotechnical Investigation, the onsite geologic materials are in the low expansion range. Therefore, impacts related to expansive soils would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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

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

**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 limited grading and excavation

associated with the installation of building footings 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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

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

**Potentially Significant Impact.** As the Project would have the potential to emit greenhouse gases, the EIR will include further evaluation of project-related emissions and associated emission reduction strategies to determine whether the Project conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases (e.g., Assembly Bill [AB] 32 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The following analysis is based, in part, on the *Phase I Environmental Site Assessment* (Phase I ESA) and the *Phase II Environmental Site Assessment* (Phase II ESA) prepared for the Project by Advantage Environmental Consultants, LLC, dated February 12, 2019, revised August 3, 2020, and May 1, 2020. The Phase I ESA and the Phase II ESA are included as Appendix IS-3 of this Initial Study.

**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 types and amounts of hazardous materials to be used for the Project would be typical of those used during construction activities and those typically used in the operation of office and commercial uses, as discussed in the following analysis.

### **Construction**

The Project would not involve the routine (long-term) transport of hazardous materials to and from the Project Site during construction. During demolition, 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 (long-term) disposal of hazardous materials. Notwithstanding, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, existing regulations are 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 comply 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. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

### **Operation**

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those currently used in the existing office and commercial uses onsite, including cleaning products, paints, and those used for maintenance of landscaping. As with existing conditions on the Project Site, 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. 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, based on available historical sources, as early as 1927 the Project Site appears to be bisected from north to south by Sierra Bonita Avenue with residential uses located along Sierra Bonita Avenue. An office and garage are also depicted on the northwestern corner of the eastern half of the Project Site. Residential structures are also located along the eastern side of the Project Site. By 1950, three commercial structures are located on the northern portion of the Project Site, along Wilshire Boulevard. A miniature golf course is shown on the northeastern corner of the Project Site. Residential structures occupy the remainder of the Project Site with apartment buildings at the center of the Project Site along the east side of Sierra Bonita Avenue and at the southern end of the eastern side of the Project Site on Sierra Bonita Avenue. Based on historical maps from 1964 to 1980, the majority of the Project Site appears as a parking lot. By 1989, the Project Site is in its current configuration with two commercial buildings on either side of a driveway that leads from Wilshire Boulevard. Based on a review of available documents and database records search, no Historical Recognized Environmental Conditions (HRECs), Recognized Environmental Conditions (RECs), or Controlled Recognized Environmental Conditions (CRECs) were identified in connection with the Project Site.

As part of the Phase I ESA, interviews and visual observations were completed at the Project Site to evaluate for the possible presence of abandoned in-place underground storage tanks (USTs) and above ground storage tanks (ASTs). The Phase I ESA also included an assessment of other hazardous substances, including asbestos-containing materials (ACMs), lead-based paint (LBP), and polychlorinated biphenyls (PCBs). As discussed further below, a Phase II ESA, included in Appendix IS-5 of this Initial Study, was also prepared to further evaluate the impacts to soil and soil vapor beneath the Project Site. Provided below is a summary of the findings of the Phase II 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.

## **Construction**

### **Hazardous Waste Generation, Handling, and Disposal**

During demolition, 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. Therefore, impacts associated with hazardous waste generation, 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.

As discussed in the Phase II ESA, in the soil samples analyzed, total petroleum hydrocarbons (TPH) in the diesel and oil ranges were at insignificant concentrations at depths shallower than 20 feet below the surface. Concentrations of TPH above human health risk-based screening levels were detected at depths of 20 feet and below. However, the Phase II ESA determined that such detections resulted from a naturally occurring source (nearby tar pits). In addition, as discussed below, the volatile organic compounds (VOCs) in soil gas are not considered to be of concern. As such, the presence of such impacted soil at the Project Site does not represent a significant threat to human health or the environment. In the event that petroleum impacted soil is displaced during future construction activities at the Project Site, proper management and off-site disposal of any impacted material will be required. 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.

As discussed in the Phase II ESA, concentrations of VOCs and nine of the 17 Title 22 Metals were detected at or above the laboratory reporting limits in the soil gas samples. However, as concluded in the Phase II ESA, the slight exceedances of VOCs are considered to be insignificant and not of concern relative to current or future land uses on the Project Site. In addition, with regard to the concentrations of the detected metals, the maximum concentrations of the detected metals did not exceed their respective human health risk-based screening levels for residential and commercial soil.

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, and impacts associated with hazardous waste generation, 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, based on available LAFD records, there are two diesel Underground Storage Tanks (UST) onsite that supply fuel for two emergency generators. One UST is located outside in a lawn area at the west side of the 5750 building and the other is located outside in a lawn area at the east side of the 5700 building. The Project would not involve any construction in or near the area of the existing USTs. In addition, inspection reports and monitoring system certifications pertaining to the existing USTs did not reveal conditions indicative of releases from the tanks. No evidence of existing Aboveground Storage Tanks (AST) was observed on the Project Site. In the unlikely event that USTs are found during construction, 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. 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, and 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.

### **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 detailed in the Phase I ESA, based on the age of the structures on the Project Site (post-1970), there is likely no potential for PCBs at the Project 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, and 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.

### **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. As discussed in the Phase I ESA, based on the age of the structures on the Project Site (post-1970), there is likely no potential for asbestos-containing building materials at the Project Site. Notwithstanding, in the event 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, and 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 noted in the Phase I ESA, based on the age of the onsite structures (post-1970), there is likely no potential for lead-based paint at the Project Site. Notwithstanding, in the event that LBP is found within areas proposed for demolition, 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, and 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.

## **Methane**

The Project Site is located within a designated Methane Zone mapped by the City. As discussed in detail in the Methane Report,<sup>49</sup> included in Appendix IS-3 of this Initial Study, methane was detected in concentrations up to 56,750 parts per million in volume (ppmv). However, adherence to standard construction safety measures, as well as compliance with California Occupational Safety and Health Act (OSHA) safety requirements, would serve to reduce the risk in the event that elevated levels of gases are encountered during grading and construction. As such, with compliance with existing regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving methane gas, and impacts associated with methane gas and hydrogen sulfide would be less than significant with implementation of mitigation.

## **Operation**

### **Hazardous Waste Generation, Handling, and Disposal**

As discussed above, the soil vapor monitoring conducted at the Project Site did detect concentrations of TPH above human health risk-based screening levels at depths of 20 feet and below. However, the Phase II ESA determined that such detections resulted from a naturally occurring source (nearby tar pits). In addition, as discussed above, concentrations of VOCs and nine of the 17 Title 22 Metals were detected at or above the laboratory reporting limits in the soil gas samples. However, as concluded in the Phase II ESA, the slight exceedances of VOCs is considered to be insignificant and not of concern relative to current or future land uses on the Project Site and the maximum concentrations of the detected metals did not exceed their respective human health risk-based screening levels for residential and commercial soil. As such, the presence of such impacted soil at the Project Site does not represent a significant threat to human health or the environment. In addition, 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. 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, and impacts associated with hazardous waste generation, handling, and disposal during operation of the Project would be less than significant. No further analysis of this topic in an EIR is required.

---

<sup>49</sup> It is noted that while the Methane Report described the uses that were proposed at the time of the preparation of the report, the area of proposed development evaluated in the Methane Report and as described in this Initial Study remain unchanged.

## **Underground and Aboveground Storage Tanks**

The Project does not propose the installation of underground or aboveground storage tanks. 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, and impacts associated with underground and aboveground storage tanks during operation of the Project would be less than significant. 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, and no impacts related to PCBs during Project operation would occur. 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, and no impacts associated with asbestos or ACMs during operation of the Project would occur. 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, and impacts associated with LBP during operation of the Project would not occur. No further analysis of this topic in an EIR is required.

## **Methane Gas**

All new buildings and paved areas located within a Methane Zone would comply with the City of Los Angeles' Methane Mitigation Ordinance. Specifically, the Methane Report, included in Appendix IS-3 of this Initial Study, identified methane beneath the Project Site in concentrations up to 56,750 ppmv. Based on the City's Methane Mitigation Requirements, the Project Site is considered to be Design Level V. Based on this, each new structure proposed by the Project would include passive and active systems to reduce the hazards associated with methane. These systems would include, but are not limited to,

perforated horizontal pipes, impervious membrane, gas detection system, and a mechanical ventilation system. As the permitting process would ensure that new development would comply with the City's Methane Mitigation Ordinance, 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, and impacts associated with the release of methane gas during operation would be less than significant. No further analysis of this topic 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 is an existing school within 0.25 mile of the Project site. Cathedral Chapel School is located approximately 0.25 mile east of the Project Site at 755 South Cochran Avenue. As previously discussed, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed uses would be typical of office developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used within and in the vicinity of the Project Site. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Specifically, the Project does not involve the development of industrial or other uses that would emit large amounts of chemicals or acutely hazardous materials. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. As such, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

The Phase I ESA for the Project Site obtained a database search report that documents findings of various federal, state, and local regulatory database searches regarding properties with known or suspected releases of hazardous materials. Based on the database records search, the Project Site is

listed on the UST and RCRA-GEN databases. Specifically, 5700 Wilshire Boulevard (La Salle Partners Asset Mgmt and JH Snyder Co & Calif Fed Sav) and 5750 Wilshire Boulevard (La Salle Partners Asset Mgmt and E! Entertainment Television) are listed on the UST database with no indications of releases or violations. 5700 Wilshire Boulevard (Beneficial Standard Life Ins Co) is listed on the RCRA-GEN database as a small quantity generator of hazardous waste with no reported violations. While the Project would be located on a site which is included on a list of hazardous materials sites, based on available records indicating no releases or violations, such listings would not create a significant hazard to the public or the environment. 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 airport land use plan. The Project Site is located approximately 6 miles northeast of the Santa Monica Airport. As discussed above, based on a report published by the Santa Monica Municipal Airport, the Project Site is not located within the 2018 65 dB CNEL noise contours for the airport, indicating airport noise is not an issue at the Project Site.<sup>50</sup> As a result, the Project would not expose people working on the Project Site to excessive noise. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** The City of Los Angeles' General Plan Safety Element addresses public protection from unreasonable risks associated with natural disasters (e.g., fires, floods, earthquakes) and sets forth guidance for emergency response. Specifically, the Safety Element includes Exhibit H, Critical Facilities and Lifeline Systems, which identifies emergency evacuation routes, or disaster routes, along with the location of selected emergency facilities. The nearest emergency/disaster routes to the Project Site are Olympic Boulevard (0.31 mile) to the south and La Brea (0.51 mile) to the east.<sup>51</sup> While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, both directions of travel would continue to be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. Therefore, the Project would not impede emergency access within the Project Site or vicinity that could cause an impediment along City designated disaster routes such that the Project would impair the implementation of the City's emergency response plan. As such, the Project's

---

<sup>50</sup> Santa Monica Municipal Airport, Calendar Year 2018 CNEL Contours Santa Monica Municipal Airport, April 2019.

<sup>51</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 1996, Exhibit H, Critical Facilities and Lifeline Systems.



impact related to the implementation of the City’s emergency response plan would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

**No Impact.** The Project site is located in a highly urbanized area of the City. There are no wildlands located on or in the vicinity of the Project Site. The Project Site is also not located within a City-designated Very High Fire Hazard Severity Zone<sup>52</sup> or within a City-designated fire buffer zone.<sup>53</sup> Accordingly, the Project would not expose people or structures to a risk of loss, injury, or death involving wildland fires. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

**X. HYDROLOGY AND WATER QUALITY**

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<sup>52</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed March 3, 2020. 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.

<sup>53</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

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

**Less Than Significant Impact.** As provided by the following analysis, 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 discussed in Section 3, Project Description, of this Initial Study, while the Project would not include any new below-grade parking, the Project would remove a portion of the existing subterranean parking and renovate the remaining parking area. As discussed in the Geotechnical Investigation included as Appendix IS-2 of this Initial Study, groundwater was encountered at depths of approximately 31 feet below the existing site grade in one boring drilled to a maximum depth of 150 feet beneath the existing ground surface. In addition, based on review of the Seismic Hazard Evaluation Report for the Hollywood Quadrangle, the historically highest groundwater level for the Project Site was less than 10 feet below the ground surface. As further discussed in the Geotechnical Investigation, it is not uncommon for groundwater levels to vary seasonally or for groundwater seepage conditions to develop where none previously existed, especially in impermeable fine-grained soils which are heavily irrigated or after seasonal rainfall. In addition, recent requirements for stormwater infiltration could result in shallower seepage conditions in the immediate site vicinity. Thus, Project construction activities could encounter groundwater and require installation of a temporary dewatering system. Dewatering operations are practices that discharge non-stormwater, such as groundwater, that must be removed from a work location and discharged into the storm drain 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 all relevant NPDES requirements related to construction and discharges from dewatering operations.

With the implementation of site-specific BMPs included as part of an erosion control plan required to comply with the City grading permit regulations, the Project would significantly reduce or eliminate the discharge of potential pollutants from stormwater runoff. Therefore, with compliance with NPDES requirements and City grading regulations, construction of the Project would not violate any water quality standard or waste discharge requirements or otherwise substantially degrade surface water quality. Furthermore, construction of the Project would not result in discharges that would cause regulatory standards to be violated. 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**

Under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspired, captured and used, and/or treated through high efficiency BMPs onsite for the volume of water produced by the 85th percentile storm event. 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. The installed BMP systems would be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. 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.

As is typical of most urban developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, metals, pathogens, trash and debris, and oil and grease. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. As discussed in the Hydrology Report, the existing Project Site

does not have any structural or LID BMPs to treat or infiltrate stormwater. Therefore, 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. 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 analysis of this topic in an EIR is required.

## **Groundwater Quality**

### **Construction**

As discussed above, based on the historically highest groundwater level, Project construction activities could encounter groundwater and temporary dewatering may be required. In the event groundwater is encountered during construction, temporary dewatering systems such as dewatering tanks, sand media particulate, pressurized bag filters, and cartridge filters would be utilized in compliance with the NPDES permit. These temporary systems would comply with all relevant NPDES requirements related to construction. As such, groundwater quality would not be impacted from dewatering activities.

Other potential effects to groundwater quality could result from the presence of an underground storage tank (UST) or during the removal of an UST. As previously described, the Project would not involve removal of the existing USTs onsite. Notwithstanding, in the unlikely event that the two existing USTs are to be removed, they would be removed in accordance with all applicable federal, state, and local regulations. Therefore, the removal of USTs would not pose a significant hazard on groundwater quality.

As previously discussed, 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. Therefore, while there are existing groundwater production within 1 mile of the Project Site, construction activities would not be anticipated to 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**

Operational activities which could affect groundwater quality include spills of hazardous materials and leaking USTs. 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. As discussed above, the Project would not involve the installation of new USTs. In addition, based on inspection reports and monitoring system certifications pertaining to the two existing USTs did not reveal

conditions indicative of releases from the tanks. 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 analysis of this topic in an EIR is required.

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

**Less Than Significant Impact.** As discussed above, based on the historically highest groundwater level, Project construction activities could encounter groundwater and temporary dewatering may be required. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance all applicable regulations and requirements. Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.

With regard to groundwater recharge, the percolation of precipitation that falls on pervious surfaces is variable, depending on the soil type, condition of the soil, vegetative cover, and other factors. According to the Hydrology Report, the Project Site is comprised of approximately 85 percent impervious surfaces under existing conditions. In addition, stormwater that falls on the Project Site drains through the curb drain onto the street. Therefore, the degree to which surface water infiltration and groundwater recharge occurs on-site is negligible. As discussed in the Hydrology Report, with implementation of the Project, the amount of impervious area would remain at approximately 85 percent. Additionally, 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. Therefore, the Project would not interfere substantially with groundwater recharge such that groundwater management would be impeded.

Based on the above, the Project would not substantially deplete groundwater supplies or interfere with groundwater recharge. Impacts on groundwater supplies 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.** Construction activities for the Project would involve removal of the existing structures and associated hardscape as well as the excavation and removal of soil. These activities have the potential to temporarily alter existing drainage patterns on the Project site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Exposed and stockpiled soils could also 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 in Response to Checklist Question X.a, the Project would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, 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 (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Thus, through compliance with all NPDES Construction General 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.

The Project site is comprised of approximately 85 percent impervious surfaces under existing conditions. With implementation of the Project, the amount of impervious area would remain at approximately 85 percent. 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.** Construction activities for the Project would involve removal of the existing structures and associated hardscape as well as the excavation and removal of soil. These activities have the potential to temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. As discussed above in Response to Checklist Question X.a, the Project would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, 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. Thus, through compliance with all NPDES Construction General 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 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 discussed in the Hydrology Report, the Project Site is comprised of approximately 85 percent impervious surfaces under existing conditions. With implementation of the Project, the amount of impervious area would remain at approximately 85 percent. Accordingly, there would be no increase in runoff volumes into the existing storm drain system. Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that on-site or off-site flooding 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.

**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 in the Hydrology Report, stormwater runoff from the Project Site is collected and conveyed through various underground pipe networks into the Ballona Creek. As discussed above, with implementation of the Project, the amount of impervious area throughout the Project Site would remain at approximately 85 percent. Accordingly, there would be no increase in runoff volumes into the existing storm drain system. In addition, the implementation of BMPs required by the City's LID Ordinance would target runoff 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.** As discussed in the Hydrology Report, 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.<sup>54</sup> 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 the City of Los Angeles General Plan does not map the Project Site as being located within a tsunami hazard area.<sup>55</sup> Therefore, no tsunami or tsunami events would be expected to impact the Project Site. Additionally, there are no standing bodies of water near the Project Site that may experience a seiche.

Earthquake-induced flooding can also result from the failure of dams or other water-retaining structures resulting from earthquakes. According to the Geotechnical Investigation included in Appendix IS-2 of this Initial Study, the Project Site is located within a potential inundation area associated with the Hollywood Reservoir, which is held by the Mulholland Dam. The Mulholland Dam is located in the Hollywood Hills approximately 4 miles north of the Project Site. Although the Project Site is mapped within an inundation zone for the dam, catastrophic failure of this dam is expected to be a very unlikely event in that dam safety regulations exist and are enforced by the Division of Safety of Dams, Army Corp of Engineers, and the Department of Water Resources. Inspectors would require dam owners to perform work, maintenance or implement controls if issues are found with the safety of the dam. The dams are under continuous monitoring for safety against failure and the potential for seismically-induced flooding to affect the Project Site due to dam failure is low. Therefore, the risk of flooding from inundation by dam failure is considered low.

---

<sup>54</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit F, p. 57.

<sup>55</sup> City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G, Inundation & Tsunami Hazard Areas, p. 59.

As discussed above, the Project would include new structural BMPs throughout the Project Site which would reduce the amount of pollutants entering the stormwater system and groundwater in the unlikely event of inundation of the Project Site. Impacts would be less than significant, and no mitigation measures 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 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 Total Maximum Daily Load (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 land uses and may include sediment, nutrients, pesticides, pathogens, 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 Ballona Creek. With compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.



## XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### a. Would the project physically divide an established community?

**Less than Significant Impact.** As discussed in Section 3, Project Description, of this Initial Study, the Project site is located within a generally commercial, office, and residential area and is bounded by the Screen Actors Guild–American Federation of Television and Radio Artists building to the north; a 27-story office building, a four-story above grade parking structure, and Oakwood Miracle Mile apartments to the east; one- to two-story residential buildings to the south; and two- to three-story residential buildings, a three-story office building, and ancillary surface parking to the west. Existing buildings on the Project Site include two six-story primarily office buildings and three levels of subterranean parking below the buildings.

The Project would retain and renovate the southern portion of the existing buildings and would demolish the northern portion of the two existing office buildings for the addition of approximately 1,923,837 square feet of new floor area consisting of 1,806,237 square feet of office uses and 117,600 square feet of ground floor commercial space. All proposed development would occur within the boundaries of the Project Site, and the Project would not require the vacation of any surrounding streets adjacent to the Project Site. The proposed development would also be consistent with the uses already on the Project Site and immediately surrounding the Project Site. In addition, the Project does not propose a freeway or other large infrastructure that would divide the existing surrounding community. Therefore, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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

## XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

**No Impact.** No mineral extraction operations currently occur on the Project Site. The Project Site is located within an urbanized area and has been previously disturbed by development. As such, the potential for mineral resources to occur on-site is low. In addition, the Project Site is not located within a mineral producing area as classified by the California Geological Survey.<sup>56</sup> The Project Site is also not located within a City-designated oil field or oil drilling area.<sup>57</sup> Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site, and, as such, no impact would occur. No further analysis of this topic in the EIR is required.

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

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

<sup>56</sup> California Geological Survey, Aggregate Sustainability in California, Fifty-Year Aggregate Demand Compared to Permitted Aggregate Reserves, 2018.

<sup>57</sup> City of Los Angeles Department of Public Works, Bureau of Engineering, NavigateLA, <http://navigatea.lacity.org/navigatea/>, accessed April 30, 2020.

### XIII. NOISE

	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**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, 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?**

**Less Than Significant Impact.** The Project Site is not located within the vicinity of a private airstrip or airport land use plan. The nearest airport to the Project Site is the Santa Monica Airport, which is located

approximately 6 miles northeast of the Project Site. As discussed above, based on a report published by the Santa Monica Municipal Airport, the Project Site is not located within the 2018 65 dB CNEL noise contours for the airport, indicating airport noise is not an issue at the Project Site.<sup>58</sup> Therefore, the Project would not expose people residing or working in the project area to excessive airport noise. Impacts would be less than significant, and no 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

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

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

As previously discussed, the Project would retain and renovate the southern portion of the existing buildings and would demolish the northern portion of the two existing office buildings (approximately 586,275 square feet) for the development of approximately 1,923,837 square feet of new floor area

<sup>58</sup> Santa Monica Municipal Airport, Calendar Year 2018 CNEL Contours Santa Monica Municipal Airport, April 2019.

consisting of 1,806,237 square feet of office uses and 117,600 square feet of ground floor commercial space. Overall, the Project would result in a net increase of 1,219,962 square feet of office floor area and 117,600 square feet of commercial space. Based on employee generation rates from the City of Los Angeles VMT Calculator Documentation, the net increase in the office use is estimated to generate approximately 4,880 new employees and the proposed commercial use is estimated to generate 368 employees for a Project total of approximately 5,248 new employees on the Project Site.<sup>59</sup> 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 filled by people already residing in the vicinity of the Project Site and other persons would commute to the Project Site from other communities in and outside of the City. Therefore, given that the Project would not directly contribute to substantial population growth in the Project area through the development of residential uses and as some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site or who would commute, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. 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.** The Project Site is currently occupied by office uses and no housing currently exists on the Project Site. The Project would not displace any existing people or housing. No impacts 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 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:

---

<sup>59</sup> Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the rate 0.004 employee per square foot for “General Office” land use is applied to the net increase of 1,219,962 square feet of office uses, the rate 0.004 employee per square foot for “High-Turnover Sit-Down Restaurant” land use is applied to the 48,600 square feet of restaurant uses, the rate 0.001 employee per square foot for “Health Club” land use is applied to the 34,000 square feet of fitness uses, the rate 0.004 employee per square foot for “Supermarket” land use is applied to the 35,000-square-foot grocery store.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** The City of Los Angeles Fire Department (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. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?**

**Potentially Significant Impact.** Police protection for the Project Site is provided by the City of Los Angeles Police Department (LAPD). 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. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools?**

**Less Than Significant Impact.** The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). LAUSD is divided into six local districts.<sup>60</sup> The Project Site is located in

---

<sup>60</sup> Los Angeles Unified School District, Local District Maps 2015-2016, <http://achieve.lausd.net/Page/8652>, accessed May 1, 2020.

Local District–West.<sup>61</sup> As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of students within the service area of LAUSD from the introduction of a residential population. In addition, not all new employees of the Project would relocate to the vicinity of the Project Site, which could otherwise trigger a demand for new or expanded school facilities. Furthermore, even if there were new school facilities that would need to be built, pursuant to Senate Bill 50, the Project Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Therefore, impacts to schools would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

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

**Less Than Significant Impact.** Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. Nearby parks and recreational facilities within an approximate 2-mile radius of the Project Site include: Carthay Circle Park (located 0.70 mile west of the Project Site); Pan Pacific Senior Activity Center (located 0.72 mile north of the Project Site); Pan Pacific Park (located 0.95 mile north of the Project Site); LA High Memorial Park (located 1.28 miles southeast of the Project Site); Queen Anne Recreation Center (located 1.40 miles southeast of the Project Site); Eleanor Green Roberts Aquatic Center (located 1.43 miles southeast of the Project Site); Mascot Park (located 1.58 miles southeast of the Project Site); LACES Aquatic Center and Recreation Center (located 1.62 miles southwest of the Project Site); Fairfax Senior Citizen Center (located 1.62 miles northwest of the Project Site); Harold A. Henry Park (located 1.65 miles southeast of the Project Site); Claude Pepper Senior Citizen Center (located 1.76 miles southwest of the Project Site); Poinsettia Recreation Center (located 1.78 miles north of the Project Site); Genesee Avenue Park (located 1.93 miles southwest of the Project Site); and Robertson Recreation Center (located 1.97 miles southwest of the Project Site).<sup>62</sup>

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.

---

<sup>61</sup> Los Angeles Unified School District, Local District - West Map, <https://achieve.lausd.net/site/handlers/filedownload.ashx?moduleinstanceid=22573&dataid=24308&FileName=West.pdf>, accessed May 1, 2020.

<sup>62</sup> City of Los Angeles Department of Recreation and Parks, Facility Map Locator, [www.laparks.org/maplocator?cat\\_id=All&geo\[radius\]=2&geo\[latitude\]=34.0617855&geo\[longitude\]=-118.3532326&address=5700%20Wilshire%20Blvd,%20Los%20Angeles,%20CA%2090036,%20USA](http://www.laparks.org/maplocator?cat_id=All&geo[radius]=2&geo[latitude]=34.0617855&geo[longitude]=-118.3532326&address=5700%20Wilshire%20Blvd,%20Los%20Angeles,%20CA%2090036,%20USA), accessed May 1, 2020.

Furthermore, the Project proposes on-site open space amenities such as landscaped courtyards with seating for use by employees, reducing the likelihood employees would use local parks. Additionally, it is anticipated that employees would use the existing large open space area at the southern portion of the Project Site fronting 8th Street, which is improved with open space to a depth of approximately 80 feet that includes pedestrian walkways, seating areas, playground, water feature, landscaping and trees. 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 the issue in an EIR is required.

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

**Less Than Significant Impact.** Other public facilities available include libraries. The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles through its Central Library, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through Web-based resources.<sup>63</sup> The Project Site and surrounding area are served by existing libraries within the Wilshire Community Plan area, including the Fairfax Branch Library, located 0.69 mile north of the Project Site.<sup>64</sup>

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

---

<sup>63</sup> Los Angeles Public Library, Los Angeles Public Library Strategic Plan 2015–2020, [www.lapl.org/sites/default/files/media/pdf/about/LAPL\\_Strategic\\_Plan\\_2015-2020.pdf](http://www.lapl.org/sites/default/files/media/pdf/about/LAPL_Strategic_Plan_2015-2020.pdf), accessed May 1, 2020.

<sup>64</sup> Los Angeles Public Library, Locations and Hours, [/www.lapl.org/branches?distance%5Bpostal\\_code%5D=90036&distance%5Bsearch\\_distance%5D=2&distance%5Bsearch\\_units%5D=mile&field\\_branch\\_resources\\_services\\_tid=All](http://www.lapl.org/branches?distance%5Bpostal_code%5D=90036&distance%5Bsearch_distance%5D=2&distance%5Bsearch_units%5D=mile&field_branch_resources_services_tid=All), accessed May 1, 2020.



## 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

**Less Than Significant Impact.** The Project does not propose the development of residential uses which would create a direct demand on nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create a demand for parks and recreational facilities. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks and recreational facilities. Additionally, it is anticipated that employees would use the existing large open space area at the southern portion of the Project Site fronting 8th Street, which is improved with open space to a depth of approximately 80 feet that includes pedestrian walkways, seating areas, playground, water feature, landscaping and trees. Project employees would also be more likely to use parks near their homes during non-work hours. Therefore, the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. The impact on parks and recreational facilities would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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

## XVII. TRANSPORTATION

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

**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), which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743. The *Transportation Assessment Guidelines* were updated in July 2020. The Project would develop new office and commercial uses on the Project site. As a result, VMT would increase over existing conditions. Therefore, further analysis of this issue will be provided in the EIR.

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

**Less Than Significant Impact.** The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. The Project Site is located in a highly urbanized area developed with roadways and infrastructure. All access and circulation associated with the Project would be designed and constructed in conformance with all applicable requirements established by the City's Department of Building and Safety, the LAFD, and the LAMC. The Project would not include any new roads that would result in an increase in hazards due to a design feature. In addition, the Project would not result in incompatible uses as the proposed uses are consistent with the types of commercial and office uses already present on the Project Site and in the surrounding area. Thus, no impacts related to increased hazards due to a design feature or incompatible use would occur, and no mitigation measures are required. No further analysis of this topic in the EIR is required.

**d. Would the project result in inadequate emergency access?**

**Less Than Significant Impact.** The City of Los Angeles' General Plan Safety Element addresses public protection from unreasonable risks associated with natural disasters (e.g., fires, floods, earthquakes) and sets forth guidance for emergency response. Specifically, the Safety Element includes Exhibit H, Critical Facilities and Lifeline Systems, which identifies emergency evacuation routes, or disaster routes, along with the location of selected emergency facilities. The nearest emergency/disaster routes to the Project Site is Olympic Boulevard (0.31 mile) to the south and La Brea Avenue (0.51 mile) to the east.<sup>65</sup>

While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, both directions of travel would continue to be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. Therefore, the Project would not result in inadequate emergency access. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

## **XVIII. TRIBAL CULTURAL RESOURCES**

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

---

<sup>65</sup> City of Los Angeles, *Safety Element of the Los Angeles City General Plan, Critical Facilities and Lifeline Systems*, November 1996, Exhibit H.

	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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

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

As noted above, the Project would require grading, limited excavation associated with the installation of building footings, and other construction activities that could have the potential to disturb existing but undiscovered tribal cultural resources. Therefore, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native

American Tribe. In compliance with AB 52, the City will notify all applicable tribes, and the City will participate in any requested consultations for the Project. Further analysis of this topic will be provided in the EIR.

## XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

With regard to stormwater drainage, as discussed above in Checklist Section X, Hydrology and Water Quality, the Project would not result in an increase in impervious surfaces on the Project Site or an associated increase in stormwater flows. As such, the Project would not require or result in the relocation or construction of new or expanded storm water drainage.

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 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 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?**

**Potentially Significant Impact.** See Response to Checklist Question XIX.a, above.

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

**Less Than Significant Impact.** While the Bureau of Sanitation generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County 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.<sup>66</sup> Nine Class III landfills and one inert waste landfill with solid waste facility permits are currently serving the County.<sup>67</sup> 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 currently has 58.84 million tons of remaining capacity and an average daily in-County disposal rate of 854 tons per day.<sup>68</sup> 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.<sup>69</sup>

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.<sup>70</sup> The City of Los Angeles is currently diverting 76 percent of its waste from landfills.<sup>71</sup> The City has adopted the goal of achieving 90 percent diversion by 2025, and zero waste by 2030.

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

## Construction

As previously discussed, construction of the Project would retain and renovate the southern portion of the existing buildings and would demolish the northern portion of the two existing office buildings (approximately 586,275 square feet) for the development of approximately 1,923,837 square feet of new floor area consisting of 1,806,237 square feet of office uses and 117,600 square feet of ground floor commercial space. Pursuant to the requirements of SB 1374, the Project would implement a construction

---

<sup>66</sup> Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

<sup>67</sup> 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.

<sup>68</sup> County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.

<sup>69</sup> County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.

<sup>70</sup> City of Los Angeles, Solid Waste Integrated Resource Plan FAQ; [www.zerowaste.lacity.org/files/info/fact\\_sheet/SWIRPFAQS.pdf](http://www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPFAQS.pdf), accessed May 5, 2020.

<sup>71</sup> LA Sanitation, Recycling, [www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?\\_adf.ctrl-state=alxbkb91s\\_4&\\_afLoop=18850686489149411#!](http://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=alxbkb91s_4&_afLoop=18850686489149411#!), accessed May 5, 2020.

waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. 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.

As shown in Table 3 on page 88, based on construction and debris rates established by the USEPA and after accounting for mandatory recycling, the Project would generate approximately 12,295 tons of construction-related waste. It should be noted that soil export is not typically included in the calculation of construction waste to be landfilled since soil is not disposed of as waste but, rather, is typically used as a cover material or fill at other construction sites requiring soils import. Given the remaining permitted capacity at the Azusa Land Reclamation facility, which is approximately 58.84 million tons, as well as the remaining 148.4 million tons of capacity at the Class III landfills serving the County, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

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

## Operation

As shown in Table 4 on page 89, upon full buildout, the Project would result in a net increase in solid waste generation of 2,641 tons per year. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures, such as compliance with AB 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.<sup>72</sup> The estimated net increase in solid waste that would be generated by the Project represents approximately 0.002 percent of the remaining capacity (148.4 million tons) for the Class III landfills serving the County.<sup>73</sup>

The County will continue to address landfill capacity through the preparation of CoIWMP annual reports. The preparation of each annual report provides sufficient lead time (15 years) to address potential future

---

<sup>72</sup> LA Sanitation, Solid Waste Integrated Resources Plan, [www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd/s-lsh-wwd-s-zwswirp?\\_afLoop=3608041245788654&\\_afWindowMode=0&\\_afWindowId=null&\\_adf.ctrl-state=8vrc5bges\\_179#!%40%40%3F\\_afWindowId%3Dnull%26\\_afLoop%3D3608041245788654%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3D8vrc5bges\\_183](http://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd/s-lsh-wwd-s-zwswirp?_afLoop=3608041245788654&_afWindowMode=0&_afWindowId=null&_adf.ctrl-state=8vrc5bges_179#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D3608041245788654%26_afWindowMode%3D0%26_adf.ctrl-state%3D8vrc5bges_183), accessed May 5, 2020.

<sup>73</sup>  $(2,641 \text{ tons per year} / 148.4 \text{ million tons}) \times 100 \approx 0.002\%$



**Table 3  
Project Demolition and Construction Waste Generation**

Building	Size	Generation Rate (lbs/sf) <sup>a</sup>	Total (tons)
<b>Construction Waste</b>			
Office	1,806,237 sf	3.89	3,513
Restaurant	48,600 sf	3.89	95
Fitness	34,000 sf	3.89	66
Grocery	35,000 sf	3.89	68
<i>Construction Waste Subtotal</i>			3,742
<b>Demolition Waste</b>			
Office (Northern Portion of East & West Tower)	586,275 sf	155	45,436
<i>Demolition Waste Subtotal</i>			45,436
<b>Total for Construction and Demolition Waste</b>			<b>49,178</b>
<b>Total After 75-Percent Recycling</b>			<b>12,295</b>
<hr/> <i>du = dwelling unit</i> <i>lbs/sf = pounds per square foot</i> <i>sf = square feet</i> <sup>a</sup> U.S. Environmental Protection Agency, Report No. EPA530-98-010, <i>Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 4 and Table 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types.</i> <i>Source: Eyestone Environmental, 2021.</i>			

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

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

**Table 4  
Estimated Project Solid Waste Generation**

<b>Building</b>	<b>Size</b>	<b>Employee Generation Rate per sf<sup>a</sup></b>	<b>Estimated Number of Employees</b>	<b>Solid Waste Generation Rate<sup>b</sup></b>	<b>Total Generation (tons/year)</b>
<b>Existing To Be Removed</b>					
Office <sup>c</sup>	586,275 sf	0.004	2,345 emp	0.37 tn/emp/year	868
<i>Total To Be Removed</i>					868
<b>Proposed</b>					
Office	1,806,237 sf	0.004	7,225 emp	0.37 tn/emp/year	2,673
Restaurant	48,600 sf	0.004	194 emp	2.98 tn/emp/year	579
Fitness	34,000 sf	0.001	34 emp	3.79 tn/emp/year	129
Grocery	35,000 sf	0.004	140 emp	0.91 tn/emp/year	127
<b>Total Proposed</b>					<b>3,509</b>
<b>Total Net Increase (Proposed – Existing To Be Removed)</b>					<b>2,641</b>
<hr/> <i>emp = employees</i> <i>tn = tons</i> <i>sf = square feet</i> <sup>a</sup> <i>Employee Generation Rates from Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, Table 1, May 2020.</i> <sup>b</sup> <i>Non-residential yearly solid waste generation factors from LASAN City Waste Characterization and Quantification Study, Table 4, July 2002. Assumes a rate of 0.37 tons per employee per year (Services—Business) for office uses, a rate of 2.98 tons per employee per year (Retail—Restaurants) for restaurant uses, a rate of 0.91 tons per employee per year (Retail—Miscellaneous) for fitness uses, and a rate of 3.7 tons per employee per year (Retail—Food Stores) for grocery uses.</i> <sup>c</sup> <i>Project would retain and renovate the southern portion of the existing buildings and would demolish the northern portion (approximately 586,275 square feet) of the two existing office buildings.</i> <i>Source: Eyestone Environmental, 2021.</i>					

**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 AB 939, the California Integrated Waste Management Act of 1989, which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the 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 on and after April 1, 2016, depending on the amount of waste generated per week.<sup>74</sup> 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.<sup>75</sup> 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>74</sup> 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.

<sup>75</sup> Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

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

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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

**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.<sup>76</sup> Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. No impacts regarding wildfire risks would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

---

<sup>76</sup> City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APN 5089008031, <http://zimas.lacity.org/>, accessed April 29, 2020. 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.

## 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**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 Site 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. The Project Site also does not include a historical resource. Therefore, the Project would not have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, 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.

As discussed above, the Project’s potential environmental impacts for the following subject areas will be further analyzed in the EIR: air quality; cultural resources (historical and archaeological resources); geology and soils (paleontological resources); greenhouse gases emissions; energy; land use and planning; noise; public services (fire protection and police protection); transportation; tribal cultural resources; and utilities and service systems (water supply, wastewater, and energy).

**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 (historical and archaeological resources); geology and soils (paleontological resources); greenhouse gases emissions; energy; land use and planning; noise; public services (fire protection and police protection); transportation; tribal cultural resources; and utilities and service systems (water supply, wastewater, 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.

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

Due to their site-specific nature, hazards and hazardous materials impacts are typically assessed on a project-by-project basis. Therefore, as with the Project, related projects would address site-specific

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

Related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, as with the Project, related projects would be subject to the City's LID requirements and, for applicable projects, NPDES permit requirements, including development of SWPPPs for construction projects greater than 1 acre, compliance with SUSMP requirements during operation, and compliance with other local requirements pertaining to hydrology and surface water quality. It is anticipated that related projects would also be evaluated on an individual basis by 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. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to hydrology and water quality. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

In terms of population and housing, related development would not induce substantial population growth since most of the City is already fully developed and occupied by a long-standing residential population. In addition, not all related projects include residential uses. As discussed in the analysis above, the Project does not propose residential uses and thus would not directly contribute to population growth. While the Project would 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 public services such as schools, parks, libraries, and recreation, 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 for some related projects may be required to pay school impact fees, which would offset any potential impact to schools associated with the related projects. Similarly, in the case of parks and 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.

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

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

The Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction periods. However, given the 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 (historical and archaeological resources); geology and soils (paleontological resources); greenhouse gases emissions; energy; land use and planning; noise; public services (fire protection and police protection); transportation; tribal cultural resources; and utilities and service systems (water supply, wastewater, and energy). As a result, these potential effects will be analyzed further in the EIR.