

LOS ANGELES
DEPARTMENT OF CITY
PLANNING

221 North Figueroa St., Suite 1350
Los Angeles, CA 90012



INITIAL STUDY

Sunset Las Palmas Studios Enhancement Plan

Case Number: ENV-2023-4031-EIR

Project Location: 6619 W. Barton Avenue, and 6650 W. Romaine Street, Los Angeles, California 90038

Community Plan Area: Hollywood Community Plan Area

Council District: 13—Soto-Martinez

Project Description: The Sunset Las Palmas Studios Enhancement Plan Project involves the construction of 129,783 square feet of entertainment studio uses within five buildings on an approximately 3-acre site, comprised of four sound stages totaling 59,900 square feet and a production support building with 69,883 square feet of floor area, and a maximum building height of 63 feet and two subterranean parking levels. All existing buildings and structures, including 25,367 square feet of production support and office uses and a parking structure, would be removed.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

Eyestone Environmental, LLC

APPLICANT:

Hudson Pacific Properties, Inc.

September 2024

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1 INTRODUCTION

An application for the proposed Sunset Las Palmas Studios Enhancement Plan Project (Project) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles, as Lead Agency, has determined 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 proposed Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code Section 21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, Section 15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document. Based on the analysis provided within this Initial Study, the City has concluded 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 nor Mitigated Negative Declaration is appropriate, an EIR is normally required.

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1 INTRODUCTION

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

2 EXECUTIVE SUMMARY

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

3 PROJECT DESCRIPTION

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

4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

1.3 CEQA PROCESS

Below is a general overview of the CEQA process. The CEQA process is guided by the CEQA statutes and guidelines, which can be found on the State of California's website (<http://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 proposed Project may have a significant effect on the environment. This Initial Study determined that the proposed Project may have a significant effect(s) on the environment and an EIR will be prepared.

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

1.3.2 Draft EIR

Once the Draft EIR is complete, a Notice of Completion and Availability is prepared to inform public agencies and the general public of the availability of the document and the locations where the document can be reviewed. The Draft EIR and Notice of Availability are circulated for a 45-day review and comment period. The purpose of this review and comment period is to provide public agencies and the general public an opportunity to review the Draft EIR and comment on the 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 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 a revision 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 program.

2 EXECUTIVE SUMMARY

PROJECT TITLE	Sunset Las Palmas Studios Enhancement Plan
ENVIRONMENTAL CASE NO.	ENV-2023-4031-EIR
RELATED CASES	CPC-2023-4030-GPA-VZC-HD-CU-SPR

PROJECT LOCATION	Los Angeles
COMMUNITY PLAN AREA	Hollywood Community Plan
GENERAL PLAN DESIGNATION	Public Facilities & Limited Manufacturing
ZONING	PF-1XL and MR1-1
COUNCIL DISTRICT	CD 13—Hugo Soto-Martinez

LEAD AGENCY	City of Los Angeles
CITY DEPARTMENT	Department of City Planning
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PHONE NUMBER	(323) 468-3258

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 type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture & Forestry Resources | <input checked="" 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 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.

Michael Gatheru, Planning Assistant
 PRINTED NAME, TITLE

September 5, 2024
 DATE

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 Sunset Las Palmas Studios Enhancement Plan Project involves the construction of 129,783 square feet of entertainment studio uses within five buildings on an approximately 3-acre site, comprised of four sound stages totaling 59,900 square feet and a production support building with 69,883 square feet of floor area, and a maximum building height of 63 feet and two subterranean parking levels. All existing buildings and structures, including 25,367 square feet of production support and office uses and a parking structure, would be removed..

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

As shown in Figure 1 on page 8, the Project Site is located at 6650 W. Romaine Street and 6619 W. Barton Avenue within the Hollywood Community Plan area in the City of Los Angeles (City), approximately 11 miles northeast of the Pacific Ocean. The Project Site is bounded by Romaine Street to the north, Barton Avenue to the south, a City maintenance yard to the east, and Las Palmas Avenue to the west.

Local access to the Project Site is provided by the streets surrounding the Project Site, including Romaine Street, Las Palmas Avenue, and Barton Avenue. Regional access to the Project Site is provided by Santa Monica Boulevard located north of the Project Site and the Hollywood Freeway (US-101), located approximately 1.8 miles east of the Project Site.

3.2.2 Existing Conditions

As shown in the aerial photograph provided in Figure 2 on page 9, the approximate 3.1 acre Project Site is currently developed approximately 25,367 square feet of studio related support floor area within three single-story buildings and one two-story building. Existing uses within these buildings include offices, feed space, mill space and engineering spaces. The Project Site also includes a surface parking lot and a two-story parking structure. The existing buildings are primarily located along Las Palmas Avenue and along eastern portion of the Project Site. The parking structure is located within the southern portion of the Project Site along Barton Avenue. A trash compactor, two storage containers, and a paint shop are also located within the Project Site.

The Project Site is relatively flat with limited landscaping. A total of 55 street trees were identified within, adjacent to, or in the vicinity of the Project Site. Street trees surrounding the Project Site consist of various non-native species, including Crape Myrtle, Lemon Bottlebrush, Tulip Tree, Brisbane Box, Pepper

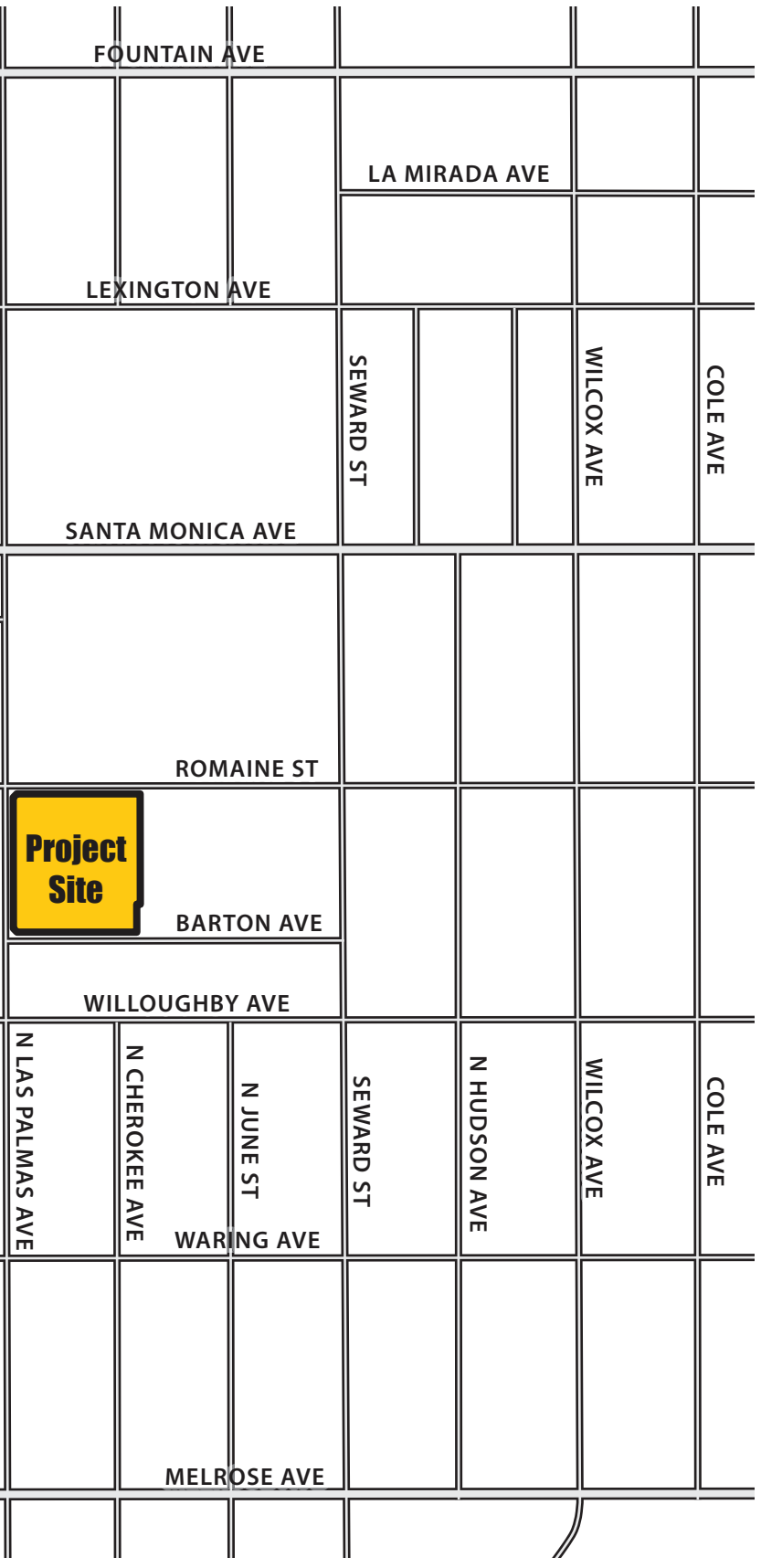
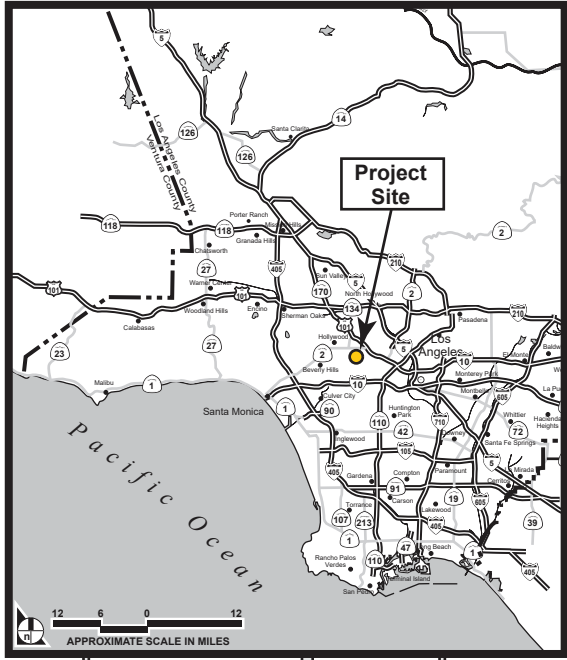


Figure 1
Project Location Map



Figure 2
Aerial Photo of the Project Site and Vicinity

Source: Google Earth, 2024; Eyestone Environmental, 2024.

Tree, Queen Palm, Bradford Pear, and Jacaranda. None of the off-site street trees are considered to be protected by the City of Los Angeles Protected Trees and Shrubs Ordinance No. 186,873.^{1,2}

The Project Site is located within the Hollywood Community Plan area and currently has two general plan land use and zoning designations. Specifically, the majority of the Project Site, including all along Romaine Street and most of the Project Site east and west boundaries, has a general plan land use designation of Public Facilities and is zoned as PF-1XL (Public Facilities, Height District 1 Extra Limited). Pursuant to the Los Angeles Municipal Code (LAMC), the PF zone permits a wide variety of land uses including, but not limited to, fire and police stations, public libraries, post offices, public health facilities, and public elementary and secondary schools. Height District 1 Extra Limited, has a height building limitation of 30 feet, and a maximum FAR of 3:1. The southern portion of the Project Site, along Barton Avenue, that contains the two-story parking garage has a general plan land use designation of Limited Manufacturing and is zoned as MR1-1. Pursuant to the LAMC, the MR1 zone permits any uses permitted in the CM Commercial Manufacturing zone and the C2 Commercial zone, clinics, media products, limited machine shops, and animal hospitals and kennels. Height District 1 within the MR1 Zone has no height limit with a maximum FAR of 1.5:1.

The Project Site is also located within a Transit Priority Area (TPA) as defined by Senate Bill (SB) 743 and the City Zoning Information Ordinance No. 2452.³ Specifically, transit options in the vicinity of the Project Site include the Hollywood/Vine station of the Metro B Line, located approximately 1.1-miles northeast of the Project Site, and Metro bus lines along Santa Monica Boulevard as well as DASH Hollywood.

3.2.3 Surrounding Land Uses

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

¹ Davey Resource Group, Arborist Report for Development at Sunset Las Palmas Studio, 6650 W. Romaine in Los Angeles, CA (APN 5532-014-039), April 1, 2024. Refer to Appendix IS-1 of this Initial Study.

² Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.

³ 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 miles 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.

Land uses surrounding the Project Site specifically include the location of the historic Hollywood Center Studios to the north across Romaine Street; residential uses to the south across Barton Avenue; a City maintenance yard and two- to four-story creative office buildings to the east; and Bancroft Middle School to the west.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Project includes the development of new studio-related production support uses and four new sound stages within the lower lot of Sunset Las Palmas Studios. The upper lot, which is the location of the historic Hollywood Center Studios, across Romaine Street is not included in the Project. As shown in Table 1 on page 12, the proposed production support uses would be provided within one new four-story building comprised of approximately 69,883 square feet of floor area. This new building would be located along Romaine Street and Las Palmas Avenue and would measure approximately 63 feet in height. Four sound stages comprised of a total of approximately 59,900 square feet would be within the central and southern portions of the Project Site. Each of the sound stages would be approximately 55 feet in height. The Project would also provide up to 277 parking spaces within two subterranean levels located under the proposed production support building. The Project also includes the construction of an onsite utility pad directly adjacent to the proposed production support building to house LADWP equipment and an aboveground generator. The area proposed for this use would not constitute floor area as defined by LAMC Section 12.03. Upon completion, the Project would result in approximately 129,783 square feet of new floor and an FAR of 0.97:1.

3.3.2 Design and Architecture

As shown in Figure 3 and Figure 4 on pages 13 and 14, the Project would be designed in a contemporary architectural style with the production support building located along the northern portion of the Project Site, and four sound stages (Stages A, B, C, and D) located along the southern portion of the Project Site. The proposed production support building would contain approximately 69,883 square feet of floor area and would be four stories with a height of 63 feet. The production support building would include a lobby, shower facilities, and restrooms on the ground floor, and production support uses on levels one through four. Landscaping elements would be provided on the majority of the roof of the building. Architectural design materials would feature rainscreen panels, concrete walls with planters, and fixed single windows that would be incorporated throughout the façade of the building.

The four sound stages (Stages A, B, C, and D) would each contain approximately 15,000 square feet of floor area and would each be one story with a height of 55 feet. The proposed sound stages would feature plaster walls and mechanical screens. Landscaping would be provided along the public right-of-way surrounding the proposed soundstages.

3.3.3 Open Space and Landscaping

As a commercial development, the Project is not required to provide open space in accordance with the LAMC. As shown in Figure 5 on page 15, the Project would incorporate landscaping elements within and

**Table 1
Summary of Existing and Proposed Floor Area^a**

Land Use	Floor Area
Existing (All to Be Removed)	
Office	6,950 sf
Mill	7,415 sf
Feed Space/Mill/Property Engineer Space	11,002 sf
Total Existing Floor Area to Be Removed	25,367 sf
New Construction	
Soundstages	59,900 sf
Production Support (including Mill Space)	69,883 sf
Total New Construction	129,783 sf
Total Floor Area Upon Completion	129,783 sf
<hr/> <i>sf = square feet</i> ^a <i>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.”</i> <i>Source: Eyestone Environmental, 2024.</i>	

along the perimeter of the Project Site, which would improve the quality of the pedestrian environment internal to the Project Site and enhance the public realm. Specifically, the Project would include new landscaping along the Project Site frontages, as well as a landscaped area on the roof of the proposed production support building.

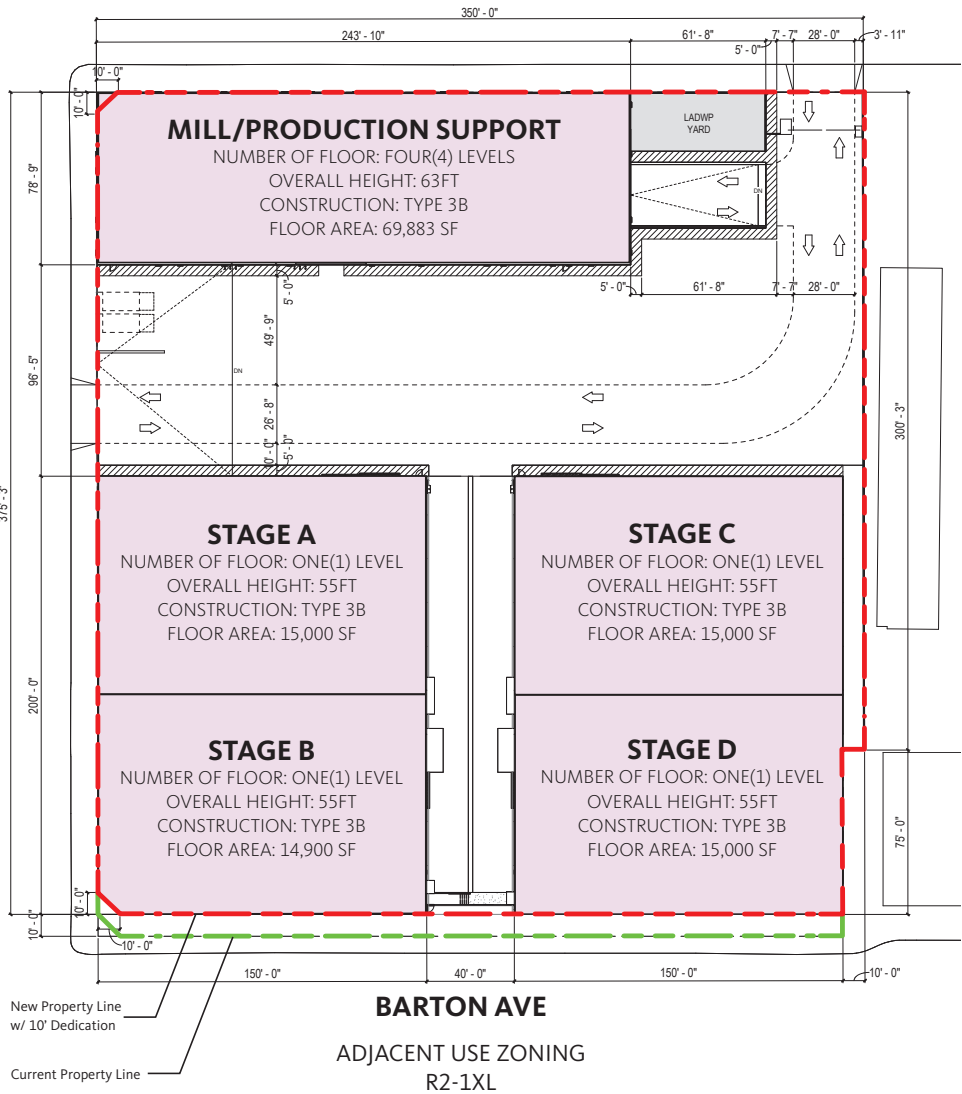
3.3.4 Access, Circulation, and Parking

Vehicular ingress/egress to the Project Site would be provided along Las Palmas Avenue and Romaine Street. Both driveways would provide access to a ramp down to the Project’s subterranean parking garage.

As previously discussed, parking would be provided within two levels of subterranean parking located within the northern portion of the Project Site and below the proposed production support building. The Project would provide a total of 277 parking spaces. In addition, the Project would provide a total of 39 bicycle parking stalls, consisting of 13 short-term spaces and 26 long-term spaces.

ADJACENT USE ZONING
MR1-1-SN
ROMAINE STREET

ADJACENT USE ZONING
[Q]PF-1XL
N LAS PALMAS AVE



- EXISTING BUILDING
- PROPOSED NEW BUILDING
- BUILDING CORE
- FIRE LANE
- PROPERTY LINE

New Property Line
w/ 10' Dedication

Current Property Line

Figure 3
Conceptual Site Plan

Source: Gensler, 2023.



VIEW HEADING WEST ALONG ROMAINE ST

Figure 4
Conceptual Rendering

3.3.5 Lighting and Signage

The Project would include low-level exterior lights adjacent to the proposed buildings and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the Project Site. All lighting would comply with current energy standards and codes while providing appropriate light levels. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light trespass from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. Specifically, all on-site exterior lighting would be automatically controlled via photo sensors to illuminate only when required and would be shielded or directed toward areas to be illuminated to limit spill-over onto nearby residential uses. Where appropriate, interior lighting would be equipped with occupancy sensors and/or timers that would automatically extinguish lights when no one is present. All exterior and interior lighting shall meet high energy efficiency requirements utilizing light-emitting diode (LED) or efficient fluorescent lighting technology.

Proposed signage would be designed to be aesthetically compatible with the existing and proposed architecture of the overall Sunset Las Palmas Studios and would comply with the Los Angeles Municipal Code. Proposed signage would include identity signage, building and tenant signage, and general ground level and way-finding pedestrian signage. 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.

3.3.6 Site Security

Project security would be achieved via a combination of physical and operational strategies aimed at providing a secure and safe working studio environment. Fencing, walls, landscaping, and other elements would be used to create a physical barrier at the perimeter of the Project Site to maintain the necessary privacy for certain production activities and ensure pedestrian safety. In addition, points of entry would be secured by elements such as guard booths, key card passes, pedestrian and vehicular access controls, and site-wide lighting. Operational elements such as 24-hour security, employee and visitor badging, and visual surveillance would further enhance the security and safety of the studio.

3.3.7 Sustainability Features

The Project would support environmental sustainability by incorporating sustainable building features and construction protocols required by the Los Angeles Green Building Code (LAMC Chapter IX, Article 9), the California Green Building Standards Code (California Code of Regulations, Title 24, Part 11; referred to as the CALGreen Code), and the California Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6; California Energy Code). In compliance with code requirements, a number of specific sustainable design components would be incorporated into the Project, potentially including, but not limited to: Energy Star appliances; plumbing fixtures and fittings that comply with the performance requirements specified in the Los Angeles Green Building Code; weather-based irrigation systems; water-efficient plantings with drought-tolerant species; vegetated roofs or cool roof systems to help reduce energy use; short- and long-term bicycle parking; use of daylighting where feasible; and energy-efficient

lighting. Such measures would address energy conservation, water conservation, and waste reduction and will be further defined in the EIR.

3.3.8 Anticipated Construction Schedule

Project construction would begin with the demolition of the existing on-site structures and parking lot. The next phase would include grading and excavation for the subterranean parking level, which would extend to a depth of up to approximately 21.5 feet below ground surface. The foundation would then be laid, followed by building construction, and then finally paving and landscaping installation. Project construction is anticipated to commence in 2026 and be completed in 2028. It is estimated that approximately 60,000 cubic yards of export would be hauled off the Project Site.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- A General Plan Amendment to change the land use for a portion of the Project Site from Public Facilities to Limited Manufacturing;
- A Vesting Zone and Height District Change from the PF-1XL and MR1-1 Zones to the (T)(Q)M1-2 Zone for the entire Project Site;
- A Determination to authorize relief from the transitional height requirements of LAMC Section 12.21.1 A.10;
- A Site Plan Review for a development that results in an increase of 50,000 gross sf or more of non-residential floor area; and
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

3.5 Responsible Public Agencies

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

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) Section 21099(d)] sets forth new guidelines for evaluating project transportation impacts under 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 City’s 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.”⁴

As discussed above in the existing regulatory setting, the Project Site is zoned MR1-1 (Heavy Industrial, Height District 1) and PF-1XL (Public Facilities, Height District 1 Extra Limited). The MR1-1 zone permits commercial uses, but while the PF-1XL zone does allow joint public private partnerships, the PF-1XL zone does not expressly allow commercial uses for private development projects. Therefore, in an abundance of caution, this Initial Study analyzes the potential aesthetic impacts of the Project. Please also note that the Project Site is located on an infill site, as that term is defined in PRC Section 21099(a)(4), because the Project Site is located in a highly urbanized area of the City of Los Angeles (City) and includes lots located within this urban area that has been previously developed. In addition, the Project Site is also located within a TPA because it is located within 0.5 miles of an existing “major transit stop.” In particular, the Project Site is located within 0.5 miles of The City’s Zone Information and Map Access System (ZIMAS) also confirms the Project Site’s location within a TPA, as defined in ZI No. 2452.

⁴ 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 January 2, 2024.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> |

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

No Less Than Significant Impact.

The term “scenic vista” generally refers to visual access to, or the visibility of, a particular sight from a given vantage point or corridor. The City recognizes the value of preserving sightlines (view access) to designated scenic resources or subjects of visual interest from public vantage points. The subjects of valued or recognized views may be focal (meaning of specific individual resources), or panoramic (meaning broad geographic area). The nature of a view may be unique, such as a view from an elevated vantage point or particular angle. Existing views may be focused on a single feature, such as a building or garden, or panoramic encompassing a broad field of view, such as ocean/coastal views, distant mountain range, or hilltop ridgelines.

As discussed in Section 3, Project Description, of this Initial Study, the Project Site is located in the highly urbanized Hollywood Community Plan area of the City. Land uses surrounding the Project Site specifically include the upper portion of the Sunset Las Palmas Studios to the north across Romaine Street; residential uses to the south across Barton Avenue; a City maintenance yard and two- to four-story creative office buildings to the east; and Bancroft Middle School to the west. Due to the highly urbanized and built out surroundings, publicly available scenic vistas of any valued visual resources that may exist in the vicinity of the Project Site are not available. Therefore, development of the Project would not have a substantial adverse effect on a scenic vista since none currently exist. No impact would occur and no further evaluation of this topic in an EIR is required.

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

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

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

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

As noted previously, the Project Site is located within the Hollywood Community Plan area and currently has two general plan land use and zoning designations. Specifically, the majority of the Project Site, including all along Romaine Street and most of the Project Site east and west boundaries, has a general plan land use designation of Public Facilities and is zoned as PF-1XL (Public Facilities, Height District 1 Extra Limited). Pursuant to the LAMC, the PF zone permits a wide variety of land uses including, but not limited to, fire and police stations, public libraries, post offices, public health facilities, and public elementary and secondary schools. Height District 1 Extra Limited, in conjunction with the PF zone, permits a height building limitation of 45 feet, a maximum of three stories, and a maximum FAR of 3:1. The southern portion of the Project Site, along Barton Avenue, that contains the two-story parking garage has a general plan land use designation of Limited Manufacturing and is zoned as MR1-1. Pursuant to the LAMC, the MR1 zone permits any uses permitted in the CM Commercial Manufacturing zone and the C2 Commercial zone, clinics, media products, limited machine shops, and animal hospitals and kennels. Height District 1 within the MR1 Zone has no height limit with a maximum FAR of 1.5:1.

As described in Section 3, Project Description, of this Initial Study, the Project would demolish the existing uses on the Project Site and construct new studio-related production support uses and four sound stages comprising a total of 129,783 square feet of floor area. The proposed production support uses would be provided within one new four-story building totaling 69,883 square feet of floor area. This new building would be located along Romaine Street and Las Palmas Avenue and would measure approximately 63 feet in height. Four sound stages, comprised of a total of approximately 59,900 square feet of floor area would be situated in the center and along the south portion of the Project Site. Each of the sound stages would be approximately 55 feet in height. The Project is requesting a General Plan Amendment to

⁵ Caltrans, List of Designated and Eligible State Scenic Highways, August 2019.

redesignate the underlying land use for the Project Site from Public Facilities and Limited Manufacturing to Limited Industrial; a Vesting Zone Change for the Project Site from PF and MR1 to a uniform M1 Zone for the entire Project Site; and a Height District Change for the Site from Height District 1 and 1XL to Height District 2, as well as Conditional Use Permits related to the amount of development and height. Upon approval of the requested entitlements, the Project will be consistent with the zoning and land use designations on the Project Site.

With regard to the City's regulations governing scenic quality, local land use plans applicable to the Project Site also include policies governing scenic quality, including the Citywide General Plan Framework Element, Citywide Design Guidelines, and Hollywood Community Plan.⁶ The Project's consistency with the general intent of these plans is briefly discussed below.

Citywide General Plan Framework

The City General Plan Framework Element provides direction regarding the City's vision for future development in the City and includes an Urban Form and Neighborhood Design chapter to guide the design of future development. One of the key objectives of the Urban Form and Neighborhood Design Chapter is to enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm (Objective 5.5). The Project would upgrade the quality of development by replacing the existing buildings and surface parking lot and integrating new landscaping on the majority of the roof of the building and along the public right-of-way surrounding the proposed soundstages. The new landscaping would be an improvement over existing conditions and would improve the pedestrian realm surrounding the Project Site.

Citywide Design Guidelines

The Citywide Design Guidelines establish guidelines to carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions. With respect to scenic quality, as discussed above, the Project would enhance the pedestrian experience with new landscaping along the public right-of-way.

Hollywood Community Plan

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

⁶ The Hollywood Community Plan does not include policies governing scenic quality.

Conclusion

Based on the above, the Project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts would be less than significant and 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?

Less Than Significant Impact. The Project Site currently generates moderate levels of light from interior light spillage from buildings, security lighting, pole lights within surface parking areas, and vehicle headlights in the 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- and mid-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 residential, office, and commercial buildings, including architectural, interior, security, and wayfinding light sources. 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.

Construction

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

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

As such, construction of the Project would not create a new source of substantial glare which would adversely affect day or nighttime views in the area.

Operation

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

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

With regard to glare, daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. Sun reflection can also occur with reflected light from parked vehicles. In general, building materials would include rainscreen panels, concrete walls with planters, and fixed single windows. The proposed sound stages would feature plaster walls and mechanical screens. In addition, all parking would be provided within two subterranean parking levels. As such, there would be limited potential from glare associated with parked vehicles. Glass used in building façades would also be low-reflective or treated with an anti-reflective coating to minimize glare.

Conclusion

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

II. AGRICULTURE AND FOREST RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 a parking structure, three single-story buildings and one two-story building. No agricultural uses or operations involving farmland occur on-site or in the vicinity of the Project Site. Furthermore, 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.^{7,8} As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is zoned MR1-1 (Heavy Industrial, Height District 1) and PF-1XL (Public Facilities, Height District 1 Extra Limited). The Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area. Additionally, the Project Site and surrounding area are not enrolled under the California Land Conservation Act and are not subject to a Williamson Act Contract.⁹ Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and 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 a parking structure, three single-story buildings and one two-story building for office space and production support uses. The Project Site does not include any forest land or timberland. In addition, as discussed above, the Project Site is not zoned for forest land and is not used as forest land.¹⁰ Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the PRC. No impacts would occur, and no 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 further evaluation of this topic in an EIR is required.

⁷ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APN 5532-014-039, <http://zimas.lacity.org/>, accessed January 2, 2024.

⁸ California Department of Conservation, California Important Farmland Finder, <https://maps.conservation.ca.gov/DLRP/CIFF/App/index.html?marker=-118.29152006048791%2C34.02551004278704%2C%2C%2C%2C&markertemplate=%7B%22title%22%3A%22%22%2C%22longitude%22%3A-118.29152006048791%2C%22latitude%22%3A34.02551004278704%2C%22isIncludeShareUrl%22%3Atrue%7D&level=14>, accessed January 2, 2024.

⁹ California Department of Conservation, The Williamson Act Status Report 2020–21, May 2022.

¹⁰ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5532-014-039 <http://zimas.lacity.org/>, accessed January 2, 2024.

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

No Impact. As discussed above, the Project Site is located in an urbanized area of the City and does not include farmland or forest land. Furthermore, 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.¹¹ 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 further evaluation of this topic in an EIR is required.

III. AIR QUALITY

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<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 (Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [PM_{2.5}], and lead¹²). SCAQMD’s 2016 and 2022 Air Quality Management Plans (AQMPs) contain a comprehensive list of

¹¹ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5532-014-039, <http://zimas.lacity.org/>, accessed January 2, 2024.

¹² Partial Nonattainment designation for lead for the Los Angeles County portion of the South Coast Air Basin only.

pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.¹³ With regard to future growth, SCAG has prepared their Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), 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 may result in an increase in stationary and mobile source air emissions. As a result, development of the Project could have a potential adverse effect on SCAQMD's implementation of the AQMP. Therefore, further evaluation of the Project's potential conflicts with the AQMP will be included in the EIR.

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

Potentially Significant Impact. As discussed above, construction and operation of the Project could result in the emission of air pollutants in the Basin, which is currently in non-attainment of federal air quality standards for ozone (extreme), PM_{2.5} (serious) and lead (partial), and state air quality standards for ozone, particulate matter less than 10 microns in size (PM₁₀), and PM_{2.5}.¹⁴ As a result, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Basin. Therefore, further evaluation of the Project's potential cumulative air pollutant emissions will be included in the EIR.

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

Potentially Significant Impact. As discussed above, the Project could result in increased short- and long-term air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Sensitive receptors located in the vicinity of the Project Site include residential and educational uses. Therefore, further evaluation of the Project's potential to result in substantial adverse impacts to sensitive receptors will be included in the EIR.

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

¹³ SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.

¹⁴ SCAQMD, National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin, 2023.

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 operation of these types of uses. In addition, on-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

Construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.¹⁵ 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.¹⁶

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 further evaluation of this topic in an EIR is required.

IV. BIOLOGICAL RESOURCES

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

¹⁵ SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/rules-compliance/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed September 26, 2023.

¹⁶ SCAQMD, Rule 402, Nuisance, adopted May 7, 1976.

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

Less Than Significant Impact. The Project Site is located in an urbanized area and is currently developed with a parking structure, three single-story buildings and one two-story building used for office space and production support uses. As described in Section 3, Project Description, of this Initial Study, the Project Site is relatively flat with limited ornamental landscaping. 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.^{17,18} In addition, there are no other sensitive natural communities identified by the California Department of Fish and Wildlife (CDFW) or the U.S. Fish and Wildlife Service (USFWS) located in or adjacent to the Project Site. Rather, the Project Site and surrounding areas contain urbanized and disturbed land. Due to the urbanized and disturbed nature of the Project Site, species likely to occur on-site or in surrounding areas are limited to small terrestrial and avian species typically found in urbanized developed settings. Based on the lack of species habitat on the Project Site and in the surrounding areas, it is unlikely that any special status species listed by the CDFW¹⁹ or by the USFWS²⁰ would be present on-site.

¹⁷ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1B—Biological Resources Areas (Metro Geographical Area), January 19, 1995, p. 2-18-4.

¹⁸ County of Los Angeles, Department of Regional Planning, Los Angeles County General Plan Update, Final Environmental Impact Report, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

¹⁹ California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, November 2023.

²⁰ 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/ecp/report/species-listings-by-state?stateAbbrev=CA&stateName=California&statusCategory=Listed>, November 15, 2023.

According to the Tree Inventory Report prepared for the Project included in Appendix IS-1 of this Initial Study, there are 55 non-protected trees within, adjacent to, or in the vicinity of the Project Site. Although unlikely, these trees could potentially provide nesting sites for migratory birds. However, the Project would comply with California Fish and Game Code Section 3503, which 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.” While the Project would require the removal of 14 existing street trees, which could potentially provide nesting sites for migratory birds, compliance with California Fish and Game Code Section 3503 and standard construction processes during nesting season would ensure that construction activities would not adversely affect nesting sites. In accordance with California Fish and Game Code Section 3503, with implementation of BIO-PDF-1, tree removal activities associated with the Project would take place outside of the nesting season (February 1–August 31), to the extent feasible. Should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found during removal activities, a buffer would be established until the fledglings have left the nest. The size of the required buffer area would vary with the species and local circumstances (e.g., presence of busy roads) and would be based on the professional judgment of the monitoring biologist, in coordination with the CDFW.

Therefore, with implementation of BIO-PDF-1 which includes compliance with California Fish and Game Code Section 3503, Migratory Bird Treaty Act (MBTA), and standard construction processes, including best management practices during nesting season, 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. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

Project Design Feature BIO-PDF-1: The Applicant shall include on the Project plans an acknowledgement of the requirements to comply with the Migratory Bird Treaty Act and California Fish and Game Code Section 3503 and best management practices recommended by a Qualified Biologist to avoid impacts to active nests, including checking for nests prior to construction activities during nesting season (February 1 to August 31) and what to do if an active nest is found, including inadvertently during grading or construction activities. To the extent feasible tree removal would occur outside of nest season. Such best management practices shall include giving an adequate construction and grading buffer to avoid the active nest during construction, such as the following:

- **Pre-Construction Survey:** For any Project requiring tree or vegetation removal during the bird nesting season (February 1 to August 31), a pre-construction nesting bird survey of all suitable habitat shall be conducted no more than 10 days prior to the initiation of demolition or tree or vegetation removal to determine if nesting birds are present. The pre-construction nesting bird survey shall be conducted on foot within the Project Site boundaries by a Qualified Biologist.
- **Buffer for Active Nests:** If any active bird nest is found during a pre-construction nesting bird survey or is discovered inadvertently during construction related activities, a Qualified Biologist shall recommend an avoidance buffer which shall be no less than is necessary to protect the nest, eggs and/or fledglings, from damage or disturbance in consideration of the following factors: the bird species, the availability of suitable habitat within the

immediate area, the proposed work activity, and existing disturbances associated with surrounding land uses. The buffer shall be demarcated using bright orange construction fencing, flagging, or other means to mark the boundary of the buffer. All construction personnel shall be notified of the buffer zone and shall avoid entering the protected area. No ground disturbing activities or vegetation removal shall occur within this buffer area until the Qualified Biologist has confirmed that breeding/nesting is complete and the young have fledged the nest and/or that the nest is no longer an active nest.

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 a parking structure, and three single-story buildings and one two-story building used for office and production support uses. No riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area.^{21,22} 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.^{23,24} There are no other sensitive natural communities identified by the CDFW or the USFWS on the Project Site or its surroundings.^{25,26} 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 further evaluation of this topic in an EIR is required.

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

No Impact. As discussed above, the Project Site is located in an urbanized area and is currently developed with a parking structure, three single-story buildings and one two-story building. In addition, the surrounding area has been fully developed. No water bodies or state and federally protected wetlands exist on the Project Site.²⁷ As such, the Project would not have a substantial adverse effect on state or

²¹ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5532-014-039, <http://zimas.lacity.org/>, accessed September 26, 2023.

²² United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed September 26, 2023.

²³ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1C—Biological Resources Areas (Central Geographical Area), January 19, 1995, p. 2-18-5.

²⁴ County of Los Angeles, Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

²⁵ California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), Hollywood Quad Species List, <https://apps.wildlife.ca.gov/bios6/>, accessed January 4, 2024.

²⁶ California Department of Fish and Wildlife, CDFW Lands, <https://apps.wildlife.ca.gov/lands/>, accessed September 26, 2023.

²⁷ United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed September 26, 2023.

federally protected wetlands. No impact would occur, and 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 a parking structure, three single-story buildings and one two-story building. In addition, the areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within or 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.^{28,29}

According to the Tree Inventory Report prepared for the Project included in Appendix IS-1 of this Initial Study, and as previously described, there are 55 non-protected trees located within, adjacent to, or in the vicinity of the Project Site, 14 of which would be removed as part of the Project. There are also four non-protected on-site trees that would be removed as part of the Project. Although unlikely, these trees could potentially provide nesting sites for migratory birds. However, the Project would comply with the Migratory Bird Treaty Act (MBTA), which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. The Project would further comply with the MBTA regulations by conducting tree or vegetation removal activities outside of the nesting season (February 1–August 31), to the extent feasible, and consistent with Project Design Feature BIO-PDF-1, if tree or vegetation removal activities occur during the nesting season, the Applicant would retain a biological monitor during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and is based on the professional judgement of the monitoring biologist, in coordination with the CDFW, as appropriate. Additionally, California Fish and Game Code Section 3503 states that “[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.” In addition, the Project would include replacement of the existing street trees to be removed at a 2:1 ratio in accordance with City requirements.

Overall, in compliance with the MBTA and California Fish and Game Code Section 3503 which are ensured through Project Design Feature BIO-PDF-1, and standard construction processes during nesting season, and replacement of street trees in accordance with the Bureau of Street Services, Urban Forestry Division’s requirements, 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

²⁸ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1C—Biological Resources Areas (Central Geographical Area), January 19, 1995, p. 2-18-5.

²⁹ County of Los Angeles, Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

corridors or impede the use of native wildlife nursery sites. Impacts would be less than significant, and 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 and Shrub Ordinance (Ordinance 186873, LAMC Chapter IV, Article 6) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, California Bay trees, Mexican Elderberry shrubs, and Toyon shrubs of at least 4 inches in diameter at breast height or 4.5 feet above the ground level at the base of the tree or shrub. These tree and shrub species are defined as “protected” by the City of Los Angeles. Trees or shrubs that have been planted as part of a tree planting program are exempt from the City’s Protected Tree and Shrub Ordinance and are not considered protected. The City’s Protected Tree and Shrub Ordinance prohibits, without a permit, the removal of any regulated protected tree, including “acts that inflict damage upon root system or other parts of the tree or shrub...” The protected tree or shrub must be replaced within the property by at least four specimens of a protected variety, except where the protected species is relocated pursuant to the LAMC. In addition, a protected tree shall only be replaced by other protected tree varieties and shall not be replaced by shrubs. A protected shrub shall only be replaced by other protected shrub varieties and shall not be replaced by trees, to the extent feasible as determined by the Advisory Agency, Board of Public Works, or a licensed or certified arborist.

According to the Tree Inventory Report prepared for the Project included in Appendix IS-1 of this Initial Study, there are 55 existing trees within, adjacent to, or in the vicinity of the Project Site. The inventoried trees include Crape Myrtle, Lemon Bottlebrush, Tulip Tree, Brisbane Box, Pepper Tree, Queen Palm, Bradford Pear, and Jacaranda, none of which are considered protected by the City of Los Angeles’ Tree Preservation Ordinance No. 186,873. As part of the Project, three trees are proposed for removal based on the location of the proposed driveways and 11 trees are proposed for removal based on the current condition of the trees, development plans for the site that remove and replace trees, and the anticipated sidewalk and roadway dedication and improvement requirements. However, in accordance with City requirements, these trees would be replaced at a 2:1 ratio. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and 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 developed with a parking structure, three single-story buildings and one two-story building. No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.³⁰ Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural

³⁰ California Department of Fish and Wildlife, California Natural Community Conservation Plans, April 2019.

community conservation plan, or other related plans. No impact would occur, and 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?

The following analysis is based on the Historic Resources Technical Report (Historic Report) prepared by Historic Resources Group in March 2024 and included as Appendix IS-2 of this Initial Study.

Less Than Significant Impact. Section 15064.5 of the CEQA Guidelines 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 an historical resources survey (meeting the criteria in PRC Section 5024.1(g)). In addition, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be 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 operates SurveyLA, a comprehensive program to identify significant historical resources throughout the City.

As previously discussed, the Project Site is currently developed with a parking structure, three single-story buildings, and one two-story building. The two-story office building with one-story rear addition was constructed in 1954, the one-story warehouse building was constructed in 1955, the canopy/shed structure was constructed in 1950, and the storage and repair building was constructed between 1948 and 1975. A detailed evaluation of the Project Site’s eligibility as a historic resource is included in the Historic Report. As discussed therein, none of the buildings within the Project Site are individually listed in

or formally determined to be eligible for listing in the National Register, the California Register, or identified in SurveyLA. Furthermore, the Project Site does not contain any extant buildings, structures, objects, sites, or districts with any historical associations or significance necessary for California Register eligibility. As such, the Project would not result in direct impacts to historic resources.

The site traditionally known as the Hollywood Center Studios located north of the Project Site, across Romaine Street, at 1040 N. Las Palmas Avenue was identified as a potential historic district by SurveyLA in 2015. Alteration of the immediate surroundings of the property would not affect the integrity of location, design, materials, or workmanship of the property. All of the contributing buildings, sites and their spatial relationships to each other would remain intact in their current locations. Therefore, integrity of feeling would also remain unaffected because all the existing physical elements that characterize the property would continue to convey the property's historic significance. Because the property would retain integrity of location, design, materials, workmanship, and feeling, it would continue to reflect its significance as an "excellent example of an independent studio facility in Hollywood;" therefore integrity of association would also remain unaffected by the Project.

The only aspect of integrity that could potentially be affected by the Project is setting. However, because it has been developed as a private, internally focused compound, the area surrounding the property has little meaning to the historic significance of the property. The larger setting (located outside the property) would not be considered character-defining or important to the integrity of the property, therefore, the Project's introduction of new construction development south of the property would not diminish its integrity. The immediate setting inside the property would remain unchanged.

Moreover, the Project proposes to construct four new stage buildings and a new mill/production support building to serve media production purposes. These buildings will be similar in size and scale to the buildings located on the property and consistent in use to the uses found within the property and in the larger surrounding area.

Therefore, the property would not be materially impaired by the Project because it would continue to retain all of its contributing elements and, character-defining features, convey its significance, and remain eligible for listing as a historic district. For these reasons, the significance and integrity of the historic property will not be materially impaired by nearby new development associated with the Project, and indirect impacts to historic resources would be less than significant.

Based on the above, the Project would not create any new significant impacts related to historical resources nor result in a substantial increase in a previously identified significant impact. No further analysis of this topic in an EIR is required.

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

The analysis below is based on the Archaeological Resources Assessment for the Sunset Las Palmas Project, Los Angeles, California (Archaeological Resources Assessment) prepared by SWCA in February 2024 and included as Appendix IS-3 of this Initial Study.

Less Than Significant Impact. CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. In addition, PRC Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions, and that there is a demonstrable public interest in that information.
2. Has a special and particular quality, such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

As discussed in detail in the Archaeological Resources Assessment, an archaeological site may be considered significant if it displays one or more of the following attributes (Office of Historic Resources [OHR] 1991): chronologically diagnostic, functionally diagnostic, or exotic artifacts; datable materials; definable activity areas; multiple components; faunal or floral remains; archaeological or architectural features; notable complexity, size, integrity, time span, or depth; or stratified deposits.

The Project Site is located within an urbanized area of the City and has been subject to grading, excavation and fill activities, and development in the past. Based on the California Historical Resources Information System (CHRIS) records search, no previous archaeological studies have been conducted within the Project Site and no archaeological resources have been previously documented within the Project Site or a 0.5-mile radius. As described in the Archaeological Resources Assessment, the closest Native American archaeological sites to the Project Site are LAN-1096 (Fern Dell) and the La Brea Tar Pits (LAN-159/H), and both of which are located more than one mile from the Project Site. Aside from these two sites, very few Native American archaeological sites have been recorded in the Hollywood area or adjacent neighborhoods in this part of the Los Angeles Basin. In addition, the historical archaeological sites recorded closest to the Project Site include three sites recorded between 0.9 and 1.8 miles from the Project Site to the north and northeast. All three sites were composed of historical refuse dating between the late eighteenth and middle twentieth centuries that were identified below ground during construction monitoring. As discussed in the Archaeological Resources Assessment, the results of the Sacred Lands File Search by the California Native American Heritage Commission (NAHC) were also negative. Thus, while the Project requires the excavation and removal of fill and underlying alluvial sediments up to approximately 21.5 feet below the current grade, the potential for unidentified archaeological resources in the form of a buried site is low.

However, the City has established a standard condition of approval to address inadvertent discovery of archaeological resources. Should archeological resources be inadvertently encountered, this condition of approval provides for temporary halting of construction activities near the encounter so the find can be evaluated. An archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating

archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements.

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

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

The analysis below is based on the Archaeological Resources Assessment included as Appendix IS-3 of this Initial Study.

Less Than Significant Impact. As discussed above, the Project Site is located within an urbanized area and has been subject to previous ground disturbance. Therefore, the potential for uncovering human remains on the Project Site is low. Nevertheless, the Project would require grading, excavation up to 21.5 feet below ground surface, trenching within the public right-of-way for utility connections, and other construction activities that could have the potential to disturb existing but undiscovered human remains. If human remains are discovered during construction of the Project, work in the immediate vicinity of the construction area would be halted, the County Coroner, construction manager, and other applicable entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5I, which require that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determines the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the person or persons it believes to be most likely descended from the deceased Native American. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. Therefore, due to the low potential that any human remains are located on the Project Site, and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, the Project's impact related to human remains would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<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. The Project may generate an increased demand for electricity and natural gas services provided by LADWP and the Southern California Gas Company, respectively, compared to existing conditions. While development of the Project would not be anticipated to cause wasteful, inefficient, and unnecessary consumption of energy resources due to compliance with existing regulations, further evaluation of the Project’s demand on existing energy resources will be provided in the EIR.

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

Potentially Significant Impact. First established in 2002 under SB 1078, California’s Renewables Portfolio Standard (RPS) is one of the most ambitious renewable energy standards in the country. The RPS program requires all electric load serving entities to procure 60 percent of its electricity portfolio from eligible renewable energy resources by 2030.³¹ LADWP provides electrical service throughout the City. LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources.

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 2022 Title 24 standards, which became effective on January 1, 2023.³² The 2022 Title

³¹ CPUC, California Renewables Portfolio Standard (RPS) Program, www.cpuc.ca.gov/RPS_Overview/, accessed September 26, 2023.

³² CEC, 2019 Building Energy Efficiency Standards, www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency, accessed September 26, 2023.

24 standards include efficiency improvements to the residential standards for attics, walls, water heating, and lighting and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1 2013 national standards.³³

As previously described, the Project Site is currently developed with a parking structure, three single-story buildings, and one two-story building. 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, further evaluation of 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 provided 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"/>
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"/>

³³ 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
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 regarding geology and soils is based on the Preliminary Geotechnical Engineering Investigation (Geotechnical Investigation) prepared by Geotechnologies Inc., dated December 2023 and revised in March 2024 (Geotechnical Investigation). The Geotechnical Investigation is included as Appendix IS-4 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. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement within the last 1.6 million years. In addition, buried thrust faults, which are faults with no surface exposure, may exist in the vicinity of the Project Site; however, due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

CGS establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (also called Special Study Zones). These zones, which extend from 200 feet to 500 feet on each side of a known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone must perform a geologic fault rupture investigation that demonstrates that the proposed building site is not threatened by surface displacement from the fault before development permits may be issued. In addition, the City designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

The Project Site is not within a currently established Alquist-Priolo Earthquake Fault Zone for surface rupture faults. The nearest Earthquake Fault Zone is located approximately 0.9 miles north of the Project Site for the Hollywood Fault.

Nevertheless, based on a review of maps published by CGS, the Southern Santa Monica Fault or North Salt Lake fault may be located in the vicinity of the northwest corner of the Project Site. In a 2014 fault evaluation report for the Hollywood Quadrangle, CGS concluded that there is no clear evidence that the North Salt Lake fault is a surface fault and found no indication in literature, or their observations, of Holocene surface rupture along this fault projection. Furthermore, the United States Geologic Survey database indicates that the rupture top for this fault is expected to be located approximately one half mile below the ground surface. No Special Studies Zones have been delineated by the State or City along any part of the North Salt Lake fault. Furthermore, the Project does not include uses such as fracking or mining that have the potential to affect the underlying seismic conditions. Based on these considerations, the potential for surface ground rupture at the Project Site is considered low. Therefore, the Project Site is no susceptible to surface fault rupture hazards, and impacts would be less than significant. No further evaluation of this topic in an EIR is required.

ii. Strong seismic ground?

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. As previously stated, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Although the North Salt Lake fault has been mapped in the vicinity of the Project Site, as noted above CGS found no indication of Holocene surface rupture along this fault projection. Therefore, the closest known active fault to the Project Site is the Hollywood Fault, mapped approximately 1.2 miles north of the Project Site. State and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. Specifically, the state and City mandate compliance with numerous rules related to seismic safety, including the Seismic Safety Act, Seismic Hazards Mapping Act, the California Building Code, 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 of these safety requirements 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, including the specific geotechnical design recommendations set forth for the Project in the Geotechnical Report.

Specifically, the Project would comply with the Los Angeles Building Code, which incorporates current seismic design provisions of the California Building Code, with City amendments, to minimize seismic impacts. The California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of LADBS, including the recommendations provided in a final, site-specific geotechnical investigation subject to review and approval by LADBS. The final geotechnical investigation would include the

recommendations of the Geotechnical Investigation and its final recommendations would be enforced by the LADBS for the construction of the Project. Furthermore, the Project does not include uses such as fracking or mining that have the potential to affect the underlying seismic conditions. Through compliance with regulatory requirements, site-specific geotechnical recommendations contained in a final design-level geotechnical engineering report, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death related to strong seismic ground shaking. Thus, impacts related to strong seismic ground shaking would be less than significant, and no further evaluation of this topic in an EIR is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a phenomenon in which saturated silty to cohesionless soils below the groundwater table are subject to a temporary loss of strength due to the buildup of excess pore pressure during cyclic loading conditions such as those induced by an earthquake. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures.

According to the City and the CGS map of Earthquake Zones of Required Investigation for the Hollywood Quadrangle, the Project Site is not located within an area identified as having a potential for liquefaction.^{34,35} Nevertheless, a site-specific liquefaction analysis was performed as part of the Geotechnical Investigation. The results of liquefaction analysis indicate the Project Site soils would not be prone to liquefaction during the design basis earthquake (i.e., magnitude 6.7). As such, impacts regarding liquefaction would be less than significant, and no further evaluation of this topic in an EIR is required.

iv. Landslides?

No Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and the Project Site is generally characterized by relatively level topography. Large areas of exposed soil and/or rocks that could fall onto the Project Site would not typically exist, since the majority of the Project Site is developed and landscaping is limited. In addition, the Project Site is not located in a landslide area as mapped by the State,³⁶ nor is the Project Site mapped as a landslide area by the City of Los Angeles.³⁷ Therefore, the Project would not directly or indirectly cause potential substantial adverse effects involving landslides. As such, no impact would occur, and no further evaluation of this topic in an EIR is required.

³⁴ State of California, California Geological Survey, Earthquake Zones of Required Investigation, Hollywood Quadrangle, Earthquake Fault Zones, November 6, 2014.

³⁵ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APN 5532-014-039, <http://zimas.lacity.org/>, accessed January 2, 2024.

³⁶ State of California, California Geological Survey, Earthquake Zones of Required Investigation, Hollywood Quadrangle, Seismic Hazard Zones, March 25, 1999.

³⁷ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 6250 W Romaine Street, February 9, 2024.

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

Less Than Significant Impact. As discussed further below in Section X, Hydrology and Water Quality of this Initial Study, the Project Site is almost entirely impervious in the existing condition. Nevertheless, development of the Project would require grading, excavation, and other construction activities that have the potential to disturb the underlying existing soils within the Project Site and expose these soils to rainfall and wind during construction, thereby potentially resulting in soil erosion. This potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities during Project construction. Specifically, all grading activities would require grading permits from LADBS, which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of LAMC Chapter IX, Article 1, which addresses grading, excavations, and fills. Furthermore, the Project would be required to comply with the City's LID ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Regarding soil erosion during Project operations, the potential for erosion is low since the Project Site would be fully developed and no soils would be left exposed. Therefore, with compliance with applicable regulatory requirements, the Project's potential impacts due to soil erosion or the loss of topsoil would be less than significant, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed above, the Project Site is not located in a landslide area as mapped by the state, nor is the Project Site mapped as a landslide area by the City. In addition, the Project would not alter exposed soils on a hill, nor inject water into the soil upslope that could cause a landslide downhill. Therefore, no impact related to landslides would occur.

Liquefaction-related effects include lateral spreading. Since the Project Site is not susceptible to liquefaction, the potential for lateral spreading would also be considered low. As such, the Project would not be located on a geologic unit or soil that is unstable, which could potentially result in lateral spreading. Impacts related to lateral spreading would be less than significant, and no further evaluation of this topic in an EIR is required.

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the rapid and intensive withdrawal of subterranean fluids such as groundwater or oil. As discussed in the Geotechnical Investigation, the Project Site is not located within a zone of known subsidence due to oil or other fluid withdrawal. As discussed in Section 3.3, Project Description, of this Initial Study, below grade parking would extend to a maximum depth of approximately 21.5 feet. As discussed in the Water Resources Report on-site borings encountered groundwater at a depth of 22.2 feet below grade. Therefore, due to the presence of groundwater near the finish floor elevation, the structure foundation would be designed to resist potential hydrostatic forces, and a permanent dewatering system would be required permanently. Temporarily, during construction, groundwater could be encountered at the limits of excavation. As stated in the Water Resources Report, temporary dewatering, if required at all, would have minimal effect on local groundwater hydrology and would protect existing building structures. In addition, as stated in the Water Resources Report, any temporary dewatering activities, if required, would comply with all applicable permit and regulatory requirements. Moreover, no large-scale extraction of

groundwater, gas, oil, or geothermal energy is occurring, or is planned at the Project Site. Therefore, ground subsidence due to withdrawal of fluid or gas at the Project Site is not anticipated. As such, the Project would not be located on a geologic unit or soil that is unstable, which could potentially result in subsidence. Impacts related to subsidence would be less than significant, and no further evaluation of this topic in an EIR is required.

As discussed above, the Project Site is not located within an area susceptible to liquefaction. As such, the Project would not be located on a geologic unit or soil that is unstable, which could potentially result in liquefaction. Impacts associated with liquefaction would be less than significant, and no further evaluation of this topic in an EIR is required.

Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading.³⁸ According to the Geotechnical Investigation, the soils underlying the Project Site are not considered prone to hydroconsolidation. As such, the Project would not be located on and or exacerbate a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in collapse. Impacts associated with collapsible soils would be less than significant, and 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. According to the Geotechnical Investigation, the on-site geological materials are in the moderate expansive potential range. The Geotechnical Report includes specific recommendations that would be implemented to address these soils. Furthermore, construction of the Project would be required to comply with the current CBC and supplemental requirements of the LAMC, as enforced by the City through the building permit process. These requirements would include building foundation and other requirements appropriate to site-specific conditions that would be provided in a design-level geotechnical evaluation for the Project as required by the City. Therefore, with implementation of the recommendations set forth in the Geotechnical Investigation as well as the design-level geotechnical evaluation for the Project, as required by the City, the Project would not exacerbate existing environmental conditions that could create substantial risk to life or property due to expansive soils. Thus, through as compliance with regulatory requirements, potential impacts associated with expansive soils would be less than significant. 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 have no impact related to the ability of soils to support septic tanks or

³⁸ ScienceDirect, Expansive Soils, www.sciencedirect.com/topics/engineering/expansive-soil, accessed September 26, 2023.

alternative wastewater disposal systems. No impact would occur, and 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 subject to previous ground disturbance, the Project would require grading, excavation, and other construction activities that could have the potential to disturb existing but undiscovered paleontological resources. 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 (GHGs) 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 GHG emissions, and to establish targets and emission reduction strategies for greenhouse gas emissions in California. Activities associated with the Project, including construction and operational activities, could result in GHG emissions that may have a significant impact on the environment. Therefore, further evaluation of the Project’s GHG emissions will be provided in the EIR.

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. The Project would have the potential to emit GHGs. Therefore, further evaluation of Project-related emissions and associated emission reduction strategies to determine whether the Project conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs will be included in an EIR.

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

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

Potentially Significant Impact. While the Project is not expected to involve hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste, further evaluation of this topic will be included in the EIR due to the proximity of the school.

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

Potentially Significant Impact. While operation of the Project is not expected to involve hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste, construction would require demolition of the existing parking lot and excavation activities. The Project is also located within a City-designated methane hazard zone.

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

Potentially Significant Impact. The nearest schools located in the vicinity of the Project Site include Para Hubert Howe Bancroft Middle School (0.1 mile west of the Project Site); Vine Street Elementary School (0.5 mile east of the Project Site); and Fairfax Senior High School (1.5 mile east of the Project Site). While the Project is not expected to involve hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste, further evaluation of this topic will be included in the EIR due to the proximity of the school.

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

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

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

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

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

Less Than Significant Impact. The nearest emergency/disaster route to the Project Site is Santa Monica Boulevard 0.12 miles north of the Project Site.³⁹ While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, both directions of travel would continue to be maintained in accordance with standard construction traffic management plans that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. Therefore, the Project would not impede emergency access within the Project Site or vicinity that could cause an impediment along City designated disaster routes such that the Project would impair the implementation of the City's emergency response plan. As such, the Project's impact related to the implementation of the City's emergency response plan would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less than Significant Impact. The Project Site is located in an urbanized, generally flat area, and there are no wildlands or steep slopes located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or Fire District No. 1, which consists of areas identified by the City that are required to meet additional development regulations to reduce fire hazard-related risks.⁴⁰ Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. In particular, LAMC Section 57.106.5.2 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; LAMC Section 57.118 establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects; and LAMC Section 57.507.3.1 establishes fire water flow standards. In addition, the Project's proposed studio uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, the Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death as a result of exposure to wildland fires. As such, impacts would be less than significant, and no further evaluation of this topic in the EIR is required.

³⁹ City of Los Angeles, Geohub, Disaster Routes, https://geohub.lacity.org/datasets/6223f108d67d49958d05092e0b488740_4/explore?location=34.089303%2C-118.335129%2C17.00, accessed February 9, 2024.

⁴⁰ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 6250 W Romaine Street, February 9, 2024.

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"/>
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 on the Hydrology and Water Resources Technical Report (Water Resources Report) prepared for the KPFF Consulting Engineers and dated April 1, 2024. All specific information on hydrology and water quality in the discussion below is from this report unless otherwise noted. The Water Resources Technical Report is included as Appendix IS-5 of this Initial Study.

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

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

Surface Water Quality

Construction

As discussed in the Water Resources Technical Report, construction activities such as earth moving, maintenance of construction equipment, handling of construction materials, and dewatering, can contribute to pollutant loading in stormwater runoff. However, the Project would prepare an Erosion Control Plan which would specify BMPs to be used during construction. BMPs would include but not be limited to: erosion control, sediment control, non-stormwater management, and materials management BMPs. Refer to Exhibit 1 of the Water Resources Report for typical Erosion Control BMPs to be implemented during construction of the Project.

Based on the proposed excavation depth and observed groundwater, it is anticipated that dewatering will be required during construction. The temporary dewatering system would comply with all relevant National Pollutant Discharge Elimination System (NPDES) requirements related to construction and discharges from dewatering operations.

With implementation of the Erosion Control Plan, site-specific BMPs would reduce or eliminate the discharge of potential pollutants from stormwater runoff. In addition, the Applicant would be required to comply with City grading permit regulations and inspections to reduce sedimentation and erosion. Construction of the Project would not result in discharge that would cause: (1) pollution which would alter the quality of the water of the State (i.e., Ballona Creek) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the water of the State by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes. Furthermore, construction of the Project would not result in discharges that would cause regulatory standards to be violated in the Ballona Creek Watershed. Therefore, temporary construction-related impacts on surface water quality would be less than significant.

Operation

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, and oil and grease.

In accordance with the LID Manual, 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. As discussed in the Water Resources Report, stormwater capture and use will likely be required. A storage volume of 68,832 gallons is required for capturing the runoff water from the roof and surface drains. Approximately 13,645 square feet of landscaping would be required to accept this design volume. The stormwater will be pumped to the landscape planters from the storage tank for irrigation. Any excess rainfall volume will be conveyed to the

adjacent streets by means of curb drain outlets. The Project will implement either Capture and Use System or Biofiltration Planters for managing stormwater runoff in accordance with current LID requirements.

Furthermore, operation of the Project would not result in discharges that would cause regulatory standards to be violated. A portion of the Project Site will be allocated to stormwater mitigation, in compliance with LID BMP requirements, to control and treat stormwater runoff to mitigate the 85th percentile storm event. The installed BMP systems will be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. Implementation of LID BMPs will mitigate operational impacts on surface water quality. As such, the pollutants listed above would be mitigated through the implementation of approved LID BMPs and will not increase concentrations of the items listed as constituents of concern for the Ballona Creek Watershed.

Operation of the Project would not result in discharges that would cause: (1) pollution which would alter the quality of the waters of the State (i.e., Los Angeles River) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the waters of the State by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes. Impacts to surface water quality during operation of the Project would be less than significant, and no further evaluation of this topic in an EIR is required.

Groundwater Quality

Construction

As discussed above, the Project would include excavations to a maximum depth of approximately 21.5 feet below ground surface and a net export of existing soil material. Although not anticipated at the Project Site, any contaminated soils found would be captured within that volume of excavated material, removed from the Project Site, and remediated at an approved disposal facility in accordance with regulatory requirements.

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste, would reduce the potential for the construction of the Project to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well.

There is one existing groundwater monitoring well located within a one mile radius of the Project Site at intersection of Willoughby Ave and N El Centro Ave but due to compliance with measures as listed above and the implementation of BMPs, construction activities would not be anticipated to affect existing wells. Therefore, the Project would not result in any substantial increase in groundwater contamination through hazardous materials releases and impacts on groundwater quality would be less than significant, and no further evaluation of this topic is required in the EIR.

Operation

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

Due to compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste, the Project is not anticipated to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination. Operational activities which could affect groundwater quality include hazardous material spills and leaking underground storage tanks. No underground storage tanks are currently operated or will be operated by the Project. The Project would not expand any potential areas of contamination, increasing the level of contamination, or cause regulatory water quality standard violations, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act.

The Project is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation because the Project does not involve drilling to or through a clean or contaminated aquifer. Therefore, the Project's potential impact on groundwater quality is less than significant, and no further evaluation of this topic in an EIR is required.

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

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

Construction

As described in the Geotechnical Investigation included as Appendix IS-4 of this Initial Study, the mapped historic-high groundwater level beneath the Project Site is approximately between 17 and 18 feet below ground surface and groundwater was encountered in a boring at a depth of 22.2 feet below ground surface. In addition, on-site borings encountered groundwater at a depth of 22.2 feet below grade. As such, temporary dewatering may be required during construction. If required, the temporary dewatering system would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations. In order to be authorized to discharge, the developer must submit a notice of intent to discharge groundwater generated from dewatering operations during construction. Due to the operation of dewatering systems being temporary, local groundwater hydrology in the immediate vicinity of the Site is minimally affected. The purpose of dewatering operations is for the protection of both existing and proposed building structures. Due to the limited and temporary nature of construction dewatering operations, regional impacts to groundwater flow and level are not considered to be significant. Therefore, the Project's temporary construction activities would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts on groundwater supplies during construction of the Project would be less than significant, and no further evaluation of this topic in the EIR is required.

Operation

As discussed in the Water Resources Technical Report, the Project Site is almost entirely impervious in the existing condition, and there is minimal groundwater recharge potential. The Project will develop hardscape and structures that cover approximately 100% of the Project Site with impervious surfaces and is not anticipated to have any impact on the groundwater recharge potential. As stated above, any stormwater that bypasses the BMP systems would discharge to an approved discharge point in the public right-of-way and not result in infiltration of a large amount of rainfall that would affect groundwater hydrology, including the direction of groundwater flow. Therefore, the Project's potential impact on groundwater recharge is less than significant.

The Preliminary Geotechnical Investigation, prepared by Geotechnologies for the Project Site, states that the historic groundwater level in the vicinity of the Project site was approximately 17 to 18 feet below grade. In addition, on-site borings encountered groundwater at a depth of 22.2 feet below grade. Based on the subterranean nature of the proposed structure and the anticipated groundwater levels on the site, the finished floor elevation of the proposed lowest subterranean level could extend below the historically highest groundwater level. As set forth in the Preliminary Geotechnical Investigation, the proposed structure can and will be designed to resist potential hydrostatic forces. Accordingly, a permanent dewatering system would not be required. Therefore, operation of the project would result in a less than significant impact on groundwater hydrology, including groundwater levels. No further evaluation of this topic in the 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

The Project Site is not crossed by any water courses or rivers. Construction of the Project would involve the demolition of the existing buildings and surface parking areas followed by grading and excavation activities. These activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could also contribute to erosion. However, as discussed above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows from both stormwater and non-stormwater discharges. These BMPs would be designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. In addition, Project construction activities would occur in accordance with City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, through compliance with all NPDES General Construction Permit requirements, 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's drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. As such,

construction-related impacts to erosion and siltation would be less than significant, and no further evaluation of this topic in the EIR is required.

Operation

As previously discussed, the Project would not alter the percentage of impervious surfaces on the Project Site and would provide the required 13,645 square feet of landscaping for treating the runoff water. Therefore, operation of the Project would not substantially alter the Project Site's drainage patterns in a manner that would result in substantial erosion or siltation on- or off- site. Operational impacts related to erosion and siltation would be less than significant, and no further evaluation of this topic in the 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

As indicated above, there are no streams or rivers within or immediately surrounding the Project Site. Construction activities for the Project would involve removal of the existing buildings and surface parking areas followed by grading and excavation. These activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. However, as the construction site would be greater than one acre, the Project would be required to obtain coverage under the NPDES permit. In accordance with the requirements of this permit, the Project would implement an Erosion Control Plan that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. BMPs would be designed to reduce runoff and pollutant levels in runoff during construction. Refer to Exhibit 1 of the Water Resources Report for typical Erosion Control BMPs to be implemented during construction of the Project. The Erosion Control Plan measures are designed to (and would in fact) contain and treat, as necessary, stormwater or construction watering on the Project Site so runoff does not impact off-site drainage facilities or receiving waters. Construction activities are temporary and flow directions and runoff volumes during construction will be controlled.

In addition, the Project will comply with all applicable City grading permit regulations, plans, and inspections to reduce sedimentation and erosion. Thus, through compliance with NPDES permit requirements, implementation of BMPs, and compliance with applicable City grading regulations, the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion or siltation. The Project would not result in a permanent adverse change to the movement of surface water. Therefore, construction-related impacts to surface water hydrology would be less than significant, and no further evaluation of this topic in the EIR is required.

Operation

As previously discussed, the Project Site is almost entirely impervious under existing conditions and would remain so with the Project. Accordingly, there is no incremental increase in the imperviousness of the project site. Therefore, peak flow rates would not increase and the runoff volumes into the existing

storm drain system would slightly decrease. In addition, the Project would comply with the City's LID Ordinance, which requires that post-construction stormwater runoff from new projects must be infiltrated, evapotranspired, captured and used, and/or treated through high efficiency BMPs on site for the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). 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 infiltration BMPs as established by the LID Manual. Therefore, with implementation of BMPs, the Project would not increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Operational impacts associated with flooding from surface runoff would be less than significant, and 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 detailed in the Water Resources Technical Report, a comparison of the pre- and post-Project peak flow rates indicates a decrease in stormwater runoff from the Project Site from 9.86 cubic feet per second under existing conditions to 9.28 cubic feet per second with implementation of the Project. In addition, the Project Site currently does not have BMPs for the management of pollutants or runoff. The BMPs implemented as part of the Project would control stormwater runoff and ultimately reduce or eliminate the discharge of potential pollutants from stormwater runoff. Furthermore, the Project would not cause flooding during a 50-year storm event or result in a permanent adverse change to the movement of surface water on the Project Site. 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 further evaluation of this topic in the EIR is required.

iv. Impede or redirect flood flows?

No Impact. The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City.^{41,42} 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. In addition, the Project Site is located approximately 11 miles northeast of the Pacific Ocean. Therefore, no tsunami or tsunami events would be expected to impact the Project Site. Furthermore, there are no standing bodies of water near the Project Site that may experience a seiche.

⁴¹ Federal Emergency Management Agency, Flood Insurance Rate Map 06037C1605F, September 26, 2008.

⁴² City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 6250 W Romaine Street, February 9, 2024.

Earthquake-induced flooding can also result from the failure of dams or other water-retaining structures resulting from earthquakes. According to the California Department of Water Resources (DWR), the Project Site is not located within the potential inundation area associated with Mulholland Dam located in the Hollywood Hills approximately two miles northeast of the Project Site.⁴³ Therefore, the risk of flooding from inundation by dam failure is considered low.

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

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

Less Than Significant Impact. 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 LARWQCB prepares a list of impaired waterbodies in that 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 and Water Resources Technical Report, the Project Site is located within the Los Angeles River Watershed. According to the State Water Resources Control Board (SWRCB), constituents of concern listed for the Los Angeles River Watershed under California's Clean Water Act Section 303(d) List include pH, ammonia, a number of metals, coliform, trash, scum, algae, oil, chlorpyrifos as well as other pesticides, and volatile organics.

The County of Los Angeles, the City of Los Angeles, and all other cities in the Los Angeles Watershed are responsible for the implementation of watershed improvement plans or Enhanced Watershed Management Programs (EWMP) to improve water quality and assist in meeting the TMDL milestones. The objective of the EWMP Plan for the Los Angeles River 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 commercial uses and may include sediment, nutrients, pesticides, trash and debris, oil and grease, and metals. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Since the existing Project Site does not have any structural or LID BMPs to treat or infiltrate stormwater, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. As such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans for the Los Angeles River Watershed. With compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct

⁴³ California Department of Water Resources, Dam Breach Inundation Map Web Publisher, https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2, accessed February 9, 2024.

implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant, and 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 currently developed with three single story buildings, one two-story building, and parking. The Project would replace the existing uses and parking on the Project Site with new studio uses, including production support and stages. These uses would be consistent with existing uses in the Hollywood area. In addition, access to the adjacent streets and properties would be maintained throughout construction and operation. Furthermore, 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 2, 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 potential to conflict 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. The Project Site is located within an urbanized area and no mineral extraction operations currently occur on the Project Site. In addition, the Project Site is not located within a mineral producing area as classified by CGS.⁴⁴ The Project Site is also not located within a City-designated oil field or oil drilling area.⁴⁵ As such, the potential for mineral resources to occur on-site is low. 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 CGS. 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.

⁴⁴ California Geological Survey, Aggregate Sustainability in California, Fifty-Year Aggregate Demand Compared to Permitted Aggregate Reserves, 2018.

⁴⁵ City of Los Angeles Department of Public Works, Bureau of Engineering, NavigateLA, Parcel Profile Report, www.ladbsservices2.lacity.org/OnlineServices/PermitReport/ParcelProfileDetail2?pin=144B185-971, accessed February 8, 2024.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<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 type="checkbox"/>	<input checked="" 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. Due to the proposed land uses and vibration characteristics (rapid attenuation based on distance from source), operation of the Project would not be anticipated to result in operational vibration impacts. 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?

No Impact. The Project Site is not located within the vicinity of a private airstrip or airport land use plan. The closest private airstrip or airport is the Hollywood Burbank Airport, which is located approximately seven miles north of the Project Site. Given the distance between the Project Site and the nearest airport, the Project would not expose people residing or working in the Project area to excessive noise levels. Therefore, no impact would occur, and no further evaluation of this topic 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 type="checkbox"/>	<input checked="" 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 studio uses. Since the Project does not propose a housing component, it would not directly induce a new residential population which would contribute to population growth in the vicinity of the Project Site or the Hollywood Community Plan area.

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

As previously discussed, the Project would include the development of 129,783 square feet of studio uses comprised of 69,883 square feet of production support and 59,900 square feet of sound stages. As part of the Project, the existing buildings totaling 25,367 square feet, would be demolished to accommodate the Project. Based on employee generation factors from LADOT, the Project is estimated to generate a

net increase of 418 new employees on the Project Site.^{46,47} Using employment data from the 2020–2045 RTP/SCS, an estimated 1,957,390 employees are projected within the City of Los Angeles in 2027, the Project’s buildout year, with 29,752 new employees between 2024 and 2027. The Project’s net increase in employees would represent 0.02 percent of the total number of employees in 2027 and 1.4 percent of the growth between 2024 and 2027. As noted above, the Project would not introduce new homes at the Project Site and would therefore not result in a direct population growth in the area, and the number of jobs would be consistent with SCAG’s 2020–2045 RTP/SCS. While some of the new employment positions could be filled by persons who would relocate to the vicinity of the Project Site, this potential increase in population would not be substantial since not all employees would move close to the Project Site. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project Site and other persons would commute to the Project Site from other communities in and outside of the City. Therefore, given that the Project would not directly contribute to substantial population growth in the Project area through the development of residential uses and as some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site or who would commute to the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Further, as the Project would be located in a highly developed area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth. Based on the above, the Project would not induce substantial population or housing growth. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is currently occupied by studio 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:

⁴⁶ Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.

⁴⁷ The LADOT VMT Calculator does not include an employee generation rate for studio uses. Therefore, the General Office employee generation rate of 4 employees/1,000 square feet was applied to both the existing and proposed uses.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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?

Less Than Significant Impact. The Project Site and the surrounding area are currently served by LAFD Fire Station 27, located at 1327 North Cole Avenue (approximately 0.5 miles north of the Project Site). Additional stations within two miles of the Project Site include Fire Station 82 located at 5769 Hollywood Boulevard (approximately 1.1 miles northeast of the Project Site), Fire Station 52 located at 4957 Melrose Avenue (approximately 1.2 miles southeast of the Project Site), Fire Station 41 located at 1349 North Gardner Street (approximately 1.5 miles northwest of the Project Site), and Fire Station 61 located at 5821 West 3rd Street (approximately 1.7 miles southwest of the Project Site).⁴⁸

Project construction could potentially impact the provision of LAFD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. While construction activities would primarily be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures, roadway/access improvements, and the construction of utility line connections. Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, Project construction activities could temporarily increase response times along adjacent streets due to travel time delays caused by traffic during the Project’s construction phase. However, construction-related traffic, including hauling activities and construction worker trips, would occur outside the typical weekday commuter morning and afternoon peak periods, thereby reducing the potential for traffic-related conflicts. In addition, a construction traffic management plan would be implemented during Project construction to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Project would also employ temporary traffic controls, such as flag persons, to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate

⁴⁸ LAFD, Find Your Station, www.lafd.org/fire-stations/station-results, accessed February 9, 2024.

construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Since emergency access to the Project Site would remain unobstructed during construction of the Project, impacts related to LAFD emergency access would be less than significant.

As previously discussed, the Project would include the development of 129,783 square feet of studio uses comprised of 69,883 square feet of production support and 59,900 square feet of sound stages. As part of the Project, five buildings totaling 25,367 square feet, would be demolished to accommodate the Project. Based on employee generation factors from LADOT, the Project is estimated to generate a net increase of 418 new employees on the Project Site.^{49,50} As the Project would increase the building area and daytime population of the Project Site compared to existing conditions, the Project would increase the demand for LAFD fire protection services. However, the proposed uses would be similar to existing uses within the Project Site and would be expected to generate a range of fire service calls similar to what occurs under existing conditions. The Project would not include any unique or especially hazardous uses, such as industrial facilities, that use or generate large quantities of hazardous and/or toxic materials that could pose an extreme risk of serious accident or fire at the Project Site. The types of fires that could potentially occur within the Project Site would be adequately suppressed with the fire equipment found at the fire stations nearest the Project Site. Additionally, the Project would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc., including as required by LAFD. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit.

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

Vehicular ingress/egress to the Project Site would be provided along Las Palmas Avenue and Romaine Street. Both driveways would provide access to a ramp down to the Project's subterranean parking garage. The Project would also provide a driveway along Barton Avenue. Project-related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by traffic. However, the area surrounding the Project Site includes an established street system, consisting of freeways, primary and secondary arterials, and

⁴⁹ Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.

⁵⁰ The LADOT VMT Calculator does not include an employee generation rate for studio uses. Therefore, the General Office employee generation rate of 4 employees/1,000 square feet was applied to both the existing and proposed uses.

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

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

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

Less Than Significant Impact.

The Project Site and the surrounding area are currently served by the Los Angeles Police Department's (LAPD) West Bureau and the Hollywood Community Police Station, located at 1358 North Wilcox Avenue (approximately 0.5 miles northwest of the Project Site).⁵¹ As previously noted, the Project does not include the development of residential uses. Therefore, the Project would not directly affect the existing officer-to-resident ratio within LAPD's West Bureau. However, the Project would introduce an increased employee and visitor population to the Project Site, which could result in an indirect demand for police services. These employment opportunities would include a range of full-time and part-time positions, which may be filled, in part, by employees already residing in the vicinity of the Project Site or relocated from the existing catering kitchen and who are already included in the residential population of the LAPD's

⁵¹ LAPD, Your LAPD By Division, Hollywood Community Police Station, www.lapdonline.org/lapd-contact/west-bureau/hollywood-community-police-station/?zip=952%20Vine%20Street%20Los%20Angeles%20, accessed November 3, 2023.

West Bureau. Other positions may be filled by persons who would commute and who would not relocate their place of residence as a result of working at the Project Site. Overall, given the LAPD's metrics for evaluating service capacity based on residential population, the Project's increase in the police service population would not affect the officer-to-resident ratio for LAPD's West Bureau and the officer-to-resident ratio would remain at its current level.

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

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

Less Than Significant Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). 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 Government Code Section 65995, the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Therefore, impacts to schools would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

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

Less Than Significant Impact. Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. Nearby public parks and recreational facilities within an approximate 1-mile radius include Carlton Way Park, Hollywood Recreation Center, Selma Park, Seily Rodriguez Park, De Longpre Park, and the Hollywood Pool.⁵²

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create a demand for parks. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks. In addition, Project employees would be more likely to use parks near their homes during non-work hours. Furthermore, the Project proposes on-site amenities such as a fitness center for employees and outdoor terraces, reducing the likelihood employees would use local parks. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks or the need for new or physically altered parks. Impacts would be less than significant, and no mitigation measures are required. No further analysis of the issue in an EIR is required.

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

Less Than Significant Impact. Other public facilities available include libraries. The Los Angeles Public Library (LAPL) provides library services to the City through its Central Library, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through web-based resources.⁵³ The Project area is served by existing libraries within the Hollywood Community Plan area, including the John C. Fremont Branch Library, located 0.5 miles southwest of the Project Site.

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of residents within the service population of the John C. Fremont Branch Library. In addition, Project employees would have internet access to LAPL and other web-based resources, decreasing the demand on library facilities. Furthermore, Project employees would be more likely to use library facilities near their homes during non-work hours. 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

⁵² Los Angeles Department of Recreation and Parks, Facility Map, Locator, February 9, 2024. Note: As of June 2024, the Department of Recreation and Parks website no longer offers a facility locator tool. The results of the search conducted in February 2024 are on file at the Department of City Planning.

⁵³ Los Angeles Public Library, Los Angeles Public Library Strategic Plan 2015–2020.

library services. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities or the need for new or physically altered library facilities. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

XVI. RECREATION

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

Less Than Significant Impact. As discussed above in Response to Checklist Question XV.d., the Project would not generate a new residential population that would regularly utilize nearby parks and recreational facilities, and any use of local parks and recreational facilities is anticipated to be limited. The new employment opportunities generated by the Project may be filled, at least in part, by employees presently residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of new Project employees would be expected to create new demand for local parks and recreational facilities, and such use is anticipated to be limited due to work obligations and the travel time necessary to access off-site parks and recreational facilities. In addition, Project employees are often more likely to use parks and facilities near their homes during non-work hours. Therefore, impacts related to parks and recreational facilities would be less than significant, and no further analysis of this topic in the EIR is required.

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

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

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

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

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

The Project would develop new 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 an EIR.

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

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

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. As discussed above, the nearest emergency/disaster route to the Project Site is Santa Monica Boulevard 0.12 miles north of the Project Site.⁵⁴ While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, both directions of travel would continue to be maintained in accordance with standard construction traffic management plans that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. Therefore, the Project would not result in inadequate emergency access. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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:

⁵⁴ City of Los Angeles, Geohub, Disaster Routes, https://geohub.lacity.org/datasets/6223f108d67d49958d05092e0b488740_4/explore?location=34.089303%2C-118.335129%2C17.00, accessed February 9, 2024.

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

As previously discussed, the Project would require excavations that extend approximately 21.5 feet below ground surface. As such, construction activities could potentially disturb any existing but undiscovered tribal cultural resources. Therefore, the potential exists for the Project to impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. Further analysis of this topic will be provided in an 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>

The following analysis is based, in part, on the Utility Infrastructure Technical Report: Water and Wastewater prepared by KPFF in March 2024 and included as Appendix IS-6 of this Initial Study.

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 (energy infrastructure)/Less Than Significant Impact (water, wastewater, stormwater, and telecommunications facilities). Electric power and natural gas systems consist of two components, the source of the supply and the conveyance systems (i.e., distribution lines), which link the location of these facilities to an individual development site. Given the Project's increase in floor area within the Project Site and the potential corresponding increase in electricity and natural gas demand, further analysis of this topic will be provided in the EIR.

Water

With respect to water supply, the projected demands for both fire suppression and domestic water are considered. Although domestic water demand is the Project's main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure, and therefore are the primary means for analyzing infrastructure capacity. A conservative analysis for fire suppression water flows was approved by LADWP. Refer to Exhibit 2 of the Utility Report included as Appendix IS-7 of this Initial Study for the Information of Fire Flow Availability Request (IFFAR).

The Project must comply with the fire flow requirements set forth in Section 57.507.3 of LAMC, and as determined by the LAFD. Based on the fire flow standards set forth in LAMC Section 57.507.3, the required fire flow for the Project ranges between 6,000 to 9,000 gallons per minute (gpm) from four to six hydrants running simultaneously with a residual pressure of 20 pounds per square inch (psi). The IFFAR included as Exhibit 2 of the Utility Report shows four nearby hydrants flowing simultaneously for a combined 6,000 gpm with a residual pressure of 97-99 psi. Thus, as shown by the IFFAR, the Project Site has adequate fire flow available to demonstrate compliance with LAMC Section 57.507.3 under the Project

In addition, pursuant to LAMC Section 57.513 related to supplemental fire protection, the Project would include a fire sprinkler suppression system in the new building to reduce the public fire hydrant demands, which would be subject to LAFD review and approval during the design and permitting phase of the Project. Based on Section 94.2020.0 of the LAMC that adopts by reference the National Fire Protection Association (NFPA) 14-2013, including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building would be 1,250 gpm.

With respect to domestic water use, as shown in Table 2 on page 73, the Project would result in a net increase in average daily water demand of 3,629 gallons per day (gpd). The Project would connect to the existing 6-inch main in Barton Avenue and 8-inch main in Las Palmas Avenue. The approved IFFAR indicates that 1,500 gpm (i.e., 2,594,051 gpd) is available from the existing mains, which is sufficient to serve the Project.

Therefore, based on the above, impacts related to water infrastructure would be less than significant. No further evaluation of this topic in an EIR is required.

Wastewater

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Water Reclamation Plant (HWRP). The HWRP has a capacity of 450 million gallons per day (mgd),⁵⁵ and current average wastewater flows are at approximately

⁵⁵ LASAN, Water Reclamation Plants, Hyperion Water Reclamation Plant, Treatment Process, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=bl2otw98_5&_afLoop=10327367539722560#!, accessed August 31, 2023.

Table 2
Estimated Project Water Demand/Wastewater Generation

Land Use	Floor Area	Water Demand/ Wastewater Generation Rate (gpd/unit)^a	Water Demand/ Wastewater Generation (gpd)
EXISTING TO BE REMOVED			
Office	28,833 sf	0.12 gpd/1,000 sf	2,860
<i>Existing to be Removed Subtotal</i>			2,860
PROPOSED			
Studio Production	69,883 sf	0.05 gpd/1,000 sf	3,494
Studio: Film/TV	59,900 sf	0.05 gpd/1,000 sf	2,995
Proposed Water Demand/Wastewater Generation			6,489
<i>Less Existing to Be Removed</i>			<i>(2,660)</i>
Net Increase			3,629
<hr/> <i>sf = square feet</i> <i>gpd = gallons per day</i> ^a <i>Water demand and wastewater generation rates are based on 2012 LASAN Sewer Generation Rates.</i> <i>Source: KPFF, 2024.</i>			

275 mgd.⁵⁶ Accordingly, the remaining available capacity at the HWRP is approximately 175 mgd. As shown in Table 2, the Project would generate a net increase in wastewater flow of approximately 3,629 gpd, or approximately 0.004 mgd. The Project’s increase in average daily wastewater flow of 0.004 mgd would represent approximately 0.002 percent of the current estimated 175 mgd of remaining available capacity at the HWRP. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the HWRP. Furthermore, wastewater flows would be typical of office and commercial developments which are currently treated by HWRP and no industrial discharge into the wastewater system would occur. Furthermore, discharge of effluent from the HWRP into Santa Monica Bay is also regulated by permits issued under the NPDES and is required to meet Los Angeles Regional Water Quality Control Board (LARWQCB) requirements. As LA Sanitation (LASAN) monitors the treated wastewater, and because the wastewater generated by the Project would be similar to wastewater currently treated at HWRP, wastewater generated from the Project Site would not exceed wastewater treatment requirements of LARWQCB.

The Project is anticipated to utilize existing sewer infrastructure. In the vicinity of the Project Site, there is an 8-inch vitrified clay pipe (VCP) in Barton Avenue Street and a 12-inch VCP in Romaine Street. Based on the Request for Wastewater Service Information (WWSI) included as Exhibit 1 of the Utility Report,

⁵⁶ LASAN, Water Reclamation Plants, Hyperion Water Reclamation Plant, Treatment Process, www.lacitysan.org/san/faces/wcnav_externalld/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=bl2otw98_5&_afzLoop=10327367539722560#!, accessed August 31, 2023.

LASAN stated in its WWSI that the sewer system might be able to accommodate the flow from the Project. As required by LAMC Section 64.15, the Project would submit a Sewer Capacity Availability Request to LASAN to evaluate the capability of the existing wastewater system and obtain approval to discharge the Project's wastewater to the existing sewer lines surrounding the Project Site. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for the Project during the Project's permitting process. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Therefore, the Project would not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained.

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

Stormwater

As discussed above in Response to Checklist Question X.c.ii, the Project would not alter stormwater flow rates. As such, the Project would not require or result in the relocation or construction of new or expanded stormwater drainage. Based on the above, the Project would not require or result in the construction of new stormwater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Therefore, impacts would be less than significant, and mitigation measures are not required. No further analysis of this topic in an EIR is required.

Telecommunications Facilities

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

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

Less Than Significant Impact. Water is provided to the Project Site by the Los Angeles Department of Water and Power. Water is supplied to the City from the Los Angeles Aqueduct, local groundwater, through purchase from the Metropolitan Water District, and recycled water. LADWP’s 2020 Urban Water Management Plan (UWMP) anticipates adequate water supplies would be available to serve its service area under normal, single-dry, and multi-dry year conditions through 2045.⁵⁷ Development of the Project would result in an increase in long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. Consistent with LADWP’s methodology, the analysis of the Project’s impacts relative to water supply is based on a calculation of the Project’s water demand by applying the sewage generation factors established by LASAN, which also serve to estimate water demand to the proposed uses. As shown in Table 2 on page 73, the Project would generate a net increase in water demand from the Project Site of approximately 3,629 gpd or 4.1 acre-feet per year.

As outlined in its 2020 UWMP, LADWP is committed to providing a reliable water supply for the City.⁵⁸ The 2020 LADWP UWMP takes into account the realities of climate change and the concerns of drought and dry weather and notes that the City of Los Angeles will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling.⁵⁹ The 2020 LADWP UWMP also furthers the goals of the City’s ED 5 and Sustainable City pLAn, addresses the current and future State Water Project (SWP) supply shortages, and concludes that Metropolitan Water District of Southern California’s (MWD) actions in response to the threats to the SWP will ensure continued reliability of its water deliveries.⁶⁰ By focusing on demand reduction and alternative sources of water supplies, LADWP will further ensure that long-term dependence on MWD supplies will not be exacerbated by potential future shortages.⁶¹ Additionally, as reaffirmed by L.A.’s Green New Deal, the City is committed to conserving and recycling water to help meet future water demands in the City.⁶²

Based on the above, LADWP would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, the Project’s operation-related water supply impacts would be less than significant. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As shown in Table 2, the Project would generate a net increase in wastewater flow from the Project Site of approximately 3,629 gpd, or approximately 0.004 mgd. The Project’s increase in average daily wastewater flow would represent approximately 0.002 percent of the

⁵⁷ Los Angeles Department of Water and Power, 2020 Urban Water Management Plan, May 2021.

⁵⁸ LADWP, 2020 Urban Water Management Plan, May 2021.

⁵⁹ LADWP, 2020 Urban Water Management Plan, May 2021.

⁶⁰ LADWP, 2020 Urban Water Management Plan, May 2021.

⁶¹ LADWP, 2020 Urban Water Management Plan, May 2021.

⁶² City of Los Angeles, L.A.’s Green New Deal, Sustainable City pLAn, 2019.

current 175 mgd of remaining available capacity of the HWRP.⁶³ Therefore, wastewater generated by the Project would be accommodated by the existing capacity of the HWRP.

Various factors, including future development of new treatment plants, upgrades and improvements to existing treatment capacity, development of new technologies, etc., will ultimately determine the available capacity of the Hyperion Service Area in 2027, the operational year of the Project. Planned upgrades would provide for improvements beyond 2040 to serve future population needs. However, it is conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to 2027. Thus, based on this conservative assumption, the capacity of the HWRP in 2027 would continue to be 450 mgd.

Based on LASAN's average flow projections for the HWRP, it is anticipated that average flows in 2027, the Project build-out year, would be approximately 269.3 mgd.⁶⁴ Accordingly, the future remaining available capacity in 2027 would be approximately 180.7 mgd.⁶⁵ The Project's net increase in average daily wastewater flow of 0.004 mgd would represent approximately 0.002 percent of the estimated future remaining available capacity of 180.7 mgd at the HWRP.⁶⁶ Therefore, wastewater generated under the Project would be accommodated by the future capacity of the HWRP.

Additionally, the Project's net increase in average daily wastewater generation of 0.0008 mgd plus the current average flows of approximately 275 mgd to the HWRP would represent approximately 61.1 percent⁶⁷ of the HWRP's capacity of 450 mgd. With regard to future flows, the Project's net increase of 0.004 mgd plus the projected flows of approximately 269.3 mgd to the HWRP would also represent approximately 59.8 percent⁶⁸ of the HWRP's assumed future capacity of 450 mgd.

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

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

⁶³ $(0.004 \text{ mgd} / 175 \text{ mgd}) \times 100 = 0.002\%$

⁶⁴ Los Angeles Department of Water and Power, One Water LA 2040 Plan—Volume 2, Table ES.1, Projected Wastewater Flows. Based on a straight-line interpolation of the projected flows for the Hyperion Water Reclamation Plant for 2020 (approximately 256 mgd) and 2030 (approximately 275 mgd). The 2027 value is extrapolated from 2020 and 2030 values: $[(275 \text{ mgd} - 256 \text{ mgd}) \div 10] \times 7 + 256 = \sim 269.3 \text{ mgd}$.

⁶⁵ $450 \text{ mgd} - 269.3 \text{ mgd} = 180.7 \text{ mgd}$

⁶⁶ $(0.004 \text{ mgd} \div 180.7 \text{ mgd}) \times 100 = 0.002\%$

⁶⁷ $[(0.004 \text{ mgd} + 275 \text{ mgd}) \div 450 \text{ mgd}] \times 100 = 61.1$

⁶⁸ $[(0.004 \text{ mgd} + 269.3 \text{ mgd}) \div 450 \text{ mgd}] \times 100 = \sim 59.8$

Less Than Significant Impact. While the Bureau of Sanitation generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County of Los Angeles (County) are categorized as either Class III or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in inert waste landfills.⁶⁹ Nine Class III landfills and one inert waste landfill with solid waste facility permits are currently serving the County.⁷⁰ In addition, there is one solid waste transformation facility within the County that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery.

Based on 2021 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the total remaining Class III landfill capacity in the County is estimated at 137.09 million tons. In 2021, approximately 6.24 million tons of solid waste were disposed of at the County's Class III landfills and approximately 0.375 million tons of solid waste were disposed of at County transformation facilities.⁷¹ The estimated remaining capacity for the Class III landfills open to the City is approximately 127.44 million tons.⁷² In addition, the permitted inert waste landfill serving the County is Azusa Land Reclamation. This facility currently has 50.77 million tons of remaining capacity.⁷³ The County continually evaluates landfill disposal needs and capacity through preparation of the CoIWMP Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.⁷⁴

Additionally, the City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan sets a goal of becoming a "zero waste" city by 2030. To this end, the City implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling.⁷⁵ The City is

⁶⁹ Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

⁷⁰ County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2021 Annual Report, December 2022. The 10 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, San Clemente Landfill, the Scholl Canyon Landfill, the Sunshine Canyon City and County Landfill, and the Whittier/Savage Canyon Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

⁷¹ County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022, Figure 6.

⁷² County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022

⁷³ County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022.

⁷⁴ County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022.

⁷⁵ LA Sanitation, Solid Waste Integrated Resource Plan; www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zsws-wirp?_adf.ctrl-state=bl2otw98_231&_afLoop=10329059837292084#!, accessed August 31, 2023.

currently diverting 76 percent of its waste from landfills.⁷⁶ 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 demolish 25,367 square feet of studio uses and construct 129,783 square feet of new studio uses within the Project Site. Pursuant to the requirements of SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within the County and within the Class III landfills open to the City. Furthermore, pursuant to LAMC Sections 66.32 through 66.32.5 (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.

After accounting for mandatory recycling, as shown in Table 3 on page 79, the Project would result in approximately 555 tons of construction and demolition 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 capacity at the Azusa Land Reclamation facility, which is approximately 50.77 million tons, as well as the remaining 127.44 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 80, upon full buildout, the Project would result in a net increase in solid waste generation of approximately 805 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 4 cubic yards or more per week of waste 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

⁷⁶ 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#!, accessed August 31, 2023.

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

Land Use	Size	Generation Rate (lbs/sf) ^a	Total (tons) ^b
Construction Waste (Proposed Uses)			
Soundstages	59,900 sf	3.89	117
Production Support	69,883 sf	3.89	136
Demolition Waste (Existing Uses to be Removed)			
Studio Uses	25,367 sf	155	1,966
Total Construction and Demolition Waste			2,219
Total Disposal (After 75% Diversion)			555
<hr/> <i>lbs = pounds</i> <i>sf = square feet</i> ^a USEPA, 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 various non-residential building types.</i> ^b Numbers may not sum due to rounding. Source: Eyestone Environmental, 2024.			

of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.⁷⁷

The estimated net increase in solid waste that would be generated by the Project represents approximately 0.001 percent of the remaining capacity (127.44 million tons) for the Class III landfills serving the County.⁷⁸

The County will continue to address landfill capacity through the preparation of CoIWMP annual reports. The preparation of each annual report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Solid waste disposal is an essential public service that must be provided without interruption in order to protect public health and safety, as well as the environment. Jurisdictions in the County continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning directives. These efforts, together with countywide and regional programs implemented by the County and the cities, acting in concert or independently, have achieved significant, measurable results, as documented in the 2021 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 2021 Annual Report to adequately meet countywide disposal needs through 2036 without capacity shortages.

⁷⁷ LA Sanitation, Solid Waste Integrated Resource Plan, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s-lsh-wwd-s-zwswirp?_adf.ctrl-state=bl2otw98_231&_afLoop=10329059837292084#!, accessed February 9, 2024.

⁷⁸ (805 tons per year/127.44 million tons) x 100 ≈ 0.001%

**Table 4
Estimated Project Operational Solid Waste Generation and Disposal**

Building	Size	Employee Generation Rate per sf^a	Estimated No. of Employees	Solid Waste Generation Rate^b	Total Generation (tons/year)^c
Existing Uses					
Studio Uses	25,367 sf	0.004	101 emp	10.53 lbs/emp/day	194
<i>Total Existing</i>					194
Proposed Uses (Buildout)					
Sound Stages	59,900 sf	0.004	240 emp	10.53 lbs/emp/day	461
Production Support	69,883 sf	0.004	280 emp	10.53 lbs/emp/day	538
<i>Total Project</i>	<i>129,783 sf</i>				999
Total Net Increase					805
<p><i>sf = square feet</i> <i>emp = employee</i> <i>lbs/emp/yr = tons per employee per year</i></p> <p>^a Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.</p> <p>^b Solid waste generation rates are from the City's L.A. City CEQA Thresholds Guide. The L.A. CEQA Thresholds Guide does not include a generation factor for office uses, so the commercial rate was used.</p> <p>^c Numbers may not sum due to rounding</p> <p>Source: Eyestone Environmental, 2024.</p>					

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 is required.

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

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste 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 4 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 waste⁷⁹ on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate 8 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 4 cubic yards of organic waste per week were required to arrange for organic waste recycling services. California subsequently passed SB 1383 which requires jurisdictions conduct education and outreach on organics recycling to all residents, businesses, haulers, solid waste facilities, and local food banks and other food recovery organizations.

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.⁸⁰ The Project would also comply with AB 939, AB 341, AB 1826, SB 1383, 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 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"/>

⁷⁹ 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.

⁸⁰ 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
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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"/>
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a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

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

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

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

No Impact (a-d). As discussed above, the Project Site is located in an urbanized area, and there are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or Fire District No. 1, which consists of areas identified by the City that are required to meet additional development regulations to reduce fire hazard-related risks.⁸¹ 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.

⁸¹ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 6250 W Romaine Street, February 9, 2024.

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

As discussed above, the Project’s potential environmental impacts for the following subject areas will be further analyzed in the EIR: air quality; energy; geology and soils (paleontological resources); greenhouse gas emissions; hazards and hazardous materials; land use and planning; noise; tribal cultural resources; and utilities and infrastructure (energy infrastructure).

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; energy; geology and soils (paleontological resources); greenhouse gas emissions; hazards and hazardous materials; land use and planning; noise; tribal cultural resources; and utilities and infrastructure (energy infrastructure).

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.

With respect to historic resources, the Project would not result in a cumulative impact to any historical resources. CEQA Section 15355 defines a cumulative impact as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” As analyzed above, the Project would not result in direct or indirect impacts on historical resources. Therefore, Project impacts to historic resources would not be cumulatively considerable, and cumulative impacts would be less than significant.

As analyzed above, with the exception of paleontological resources which will be analyzed in the EIR, 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.

Related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, as with the Project, related projects would be subject to the City’s LID requirements and, for applicable projects, NPDES permit requirements, including development of SWPPPs for construction projects greater than one acre, compliance with SUSMP requirements during operation, and compliance with other local requirements pertaining to hydrology and surface water quality. It is anticipated that related projects would also be evaluated on an individual basis by the 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 and therefore would not contribute to population growth. 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 since no residential units are proposed, and cumulative impacts related to population and housing would be less than significant.

With regard to fire protection, the increase in development and residential service populations from the Project, related projects, and other future development in the service areas of the above-mentioned fire stations would result in a cumulative increase in the demand for LAFD services. However, similar to the Project, the related projects and other future development projects in the Community Plan area would be reviewed by the LAFD to ensure that sufficient fire safety and hazards measures are implemented. Furthermore, each related project and other future development projects would be required to comply with regulatory requirements related to fire protection services. In addition, the Project, related projects, and other future development projects would be subject to the City's standard construction permitting process, which includes a review by LAFD for compliance with building and site design standards related to fire/life safety, as well as coordinating with LADWP to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved. Furthermore, given that the Project Site is located within an urban area, each of the related projects, as well as other future developments, would likewise be developed within urbanized locations that fall within an acceptable distance from one or more existing fire stations. In addition, as with the Project, the related projects and other future development projects in the vicinity, would also generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate. Cumulative increases in demand for fire protection services due to related projects and other future development projects would be identified and addressed through the City's annual programming and budgeting processes. LAFD resource needs would be identified and monies allocated according to the priorities at the time. Any requirement for a new fire station, or the expansion, consolidation, or relocation of an existing fire station, would also be identified through this process, the impacts of which would be addressed accordingly. Furthermore, over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to police protection, it is anticipated that the Project in combination with the related projects would increase the demand for police protection services. This cumulative increase in demand for police protection services would increase demand for additional LAPD staffing, equipment, and facilities over time. Similar to the Project, other projects served by LAPD would implement safety and security features according to LAPD recommendations. LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to

achieve the desired level of service. Through the City's regular budgeting efforts, LAPD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded police station would be funded via existing mechanisms (e.g., property and sales taxes, government funding, and developer fees) to which the Project and cumulative growth would contribute. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

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

As analyzed above, the Project would not result in inadequate emergency access. As with the Project, any driveway and/or circulation modifications proposed within or adjacent to the related project sites would be required to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. Additionally, the additional traffic generated by the related projects would be dispersed throughout the area and would not be concentrated to a specific location. Furthermore, since modifications to access and circulation plans are largely confined to a project site and the immediately surrounding area, a combination of project-specific impacts with those associated with other related projects that could lead to cumulative impacts is not expected. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to water infrastructure, as with the Project, related projects would be subject to LADWP review (e.g., preparation of an IFFAR and SAR) to ensure that the existing water infrastructure is adequate to meet the domestic and fire demands. In addition, LADWP will continue to implement and update its water system capital improvement plan that includes funding for needed water system

infrastructure improvements and maintenance. Furthermore, in accordance with City requirements, prior to ground disturbance, related projects would be required to coordinate with LADWP to identify the locations and depths of all lines, and LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service associated with the related projects. LADWP would also review and approve all appropriate connection requirements, pipe depths, and connection location(s) associated with the related projects. Additionally, as with the Project, related Projects would be required to ensure that adequate and safe access remains available within and near the related project sites during construction activities. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

With respect to water supply, LADWP's 2020 UWMP accounts for existing development within the City, as well as projected growth through the year 2045. Implementation of the Project in combination with related projects along with other projects within the service area of LADWP, would generate demand for additional water supplies. In terms of the City's overall water supply condition, the water demand for any project that is consistent with the City's General Plan has been taken into account in LADWP's 2020 UWMP. The 2020 UWMP anticipates that the future water supplies would be sufficient to meet existing and planned growth in the City to the year 2045 (the planning horizon required of 2020 UWMPs) under wet and dry year scenarios. In addition, projects meeting certain criteria would have to prepare a WSA pursuant to SB 610 to be reviewed and certified by LADWP to demonstrate adequate water supply. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

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

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

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

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

The Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction periods. However, given the 127.44 million tons of capacity at the Class III landfills serving the County and urbanized and built-out nature of most of the City, the related projects would similarly represent a minor percentage of the remaining capacity of the County's Class III landfills serving the County. Additionally, the demand for landfill capacity is continually evaluated by the County through preparation of the CoIWMP annual reports. Each annual CoIWMP report assesses future landfill disposal needs over a 15 year planning horizon. Based on the 2021 CoIWMP Annual Report, the County anticipates that future disposal needs can be adequately met for the next 15 years (i.e., 2036) with implementation of strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transformation and processing infrastructure, and use out of county disposal, including waste by rail. The preparation of each annual CoIWMP provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Furthermore, in future years, it is anticipated that the rate of declining landfill capacity would slow considering the City's goal to achieve zero waste by 2030. Therefore, cumulative impacts with respect to solid waste would be less than significant.

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

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

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