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

INITIAL STUDY

CMNTY Culture Campus Project

Case Number: ENV-2022-2377-EIR

Project Location: 6749–6767 W. Sunset Boulevard, 1518–1538 N. Highland Avenue, and 1505–1511 and 1533–1539 N. McCadden Place, Los Angeles, California 90028

Community Plan Area: Hollywood Community Plan

Council District: 13—O'Farrell

Project Description: The CMNTY Culture Campus Project (Project) is a new mixed-used commercial campus geared toward the entertainment and creative industries. The Project would be located within an 82,011-square-foot (1.88-acre) site at the northeast corner of the intersection of Sunset Boulevard and Highland Avenue at 6767 West Sunset Boulevard (Project Site) in the Hollywood Community Plan area of the City of Los Angeles (City). The Project would include the development of a new 503,520-square-foot building comprised of approximately 443,170 square feet of creative office space; 5,330 square feet of retail/restaurant space; and 55,020 square feet of commercial space anticipated to be occupied by recording and production studio and ancillary uses, including an auditorium and live performance venue. The proposed uses would be allocated throughout the new building, which would consist of two interconnected towers—a 12-story tower and a 14-story tower constructed with four shared floors. The maximum height of the taller of the two interconnected towers would be 285 feet. In accordance with the Los Angeles Municipal Code (LAMC), the Project would provide 1,000 vehicular parking spaces within six subterranean parking levels. The Project would remove seven of the 12 non-protected street trees and all six non-protected on-site trees and replace them with 31 new street trees and eight new palms along the streets. It is estimated that approximately 367,000 cubic yards of export would be hauled from the Project Site. The existing buildings totaling approximately 67,891 square feet would be demolished to accommodate the Project. Additionally, the Project proposes to merge the existing alley that runs through the south end of the Project Site into the Project Site, increasing the lot area from 82,011 square feet to 83,920 square feet. Upon completion, the Project would result in a total floor area of up to 503,520 square feet with a floor area ratio (FAR) of 6:1.

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

PREPARED BY:
Eyestone Environmental, LLC

APPLICANT:
CMNTY Culture Campus

November 2022

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1 INTRODUCTION

An application for the proposed CMNTY Culture Campus 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 (IS) 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 §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §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]

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

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1 INTRODUCTION

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

2 EXECUTIVE SUMMARY

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

3 PROJECT DESCRIPTION

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

4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

1.3 CEQA PROCESS

Below is a general overview of the CEQA process. The CEQA process is guided by the CEQA statutes and guidelines, which can be found on the State of California's website (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	**CMNTY CULTURE CAMPUS PROJECT**
ENVIRONMENTAL CASE NO.	ENV-2022-2377-EIR
RELATED CASES	CPC-2022-2376-VZC-HD-MCUP-CUX-SPR VTT-83488
PROJECT LOCATION	6749–6767 W. Sunset Boulevard, 1518–1538 N. Highland Avenue, and 1505–1511 N. McCadden Place, Los Angeles, California 90028
COMMUNITY PLAN AREA	Hollywood Community Plan
GENERAL PLAN DESIGNATION	Regional Center Commercial
ZONING	C4-2D-SN (Commercial zone, Height District 2 with Development Limitation, Hollywood Signage Supplemental Use District) and C4-2D (Commercial zone, Height District 2 with Development Limitation)
COUNCIL DISTRICT	13—O'Farrell
LEAD AGENCY	**City of Los Angeles**
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	Rey Fukuda
ADDRESS	221 North Figueroa Street, Suite 1350 Los Angeles, CA 90012
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APPLICANT	**CMNTY CULTURE CAMPUS**
ADDRESS	10877 Wilshire Boulevard, Suite 1550 Los Angeles, CA 90024
PHONE NUMBER	(917) 603-2636

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

Rey Fukuda	November 16, 2022
PRINTED NAME, TITLE	**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 that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

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

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

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

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

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

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

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

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

9) The explanation of each issue should identify:

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

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

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The CMNTY Culture Campus Project (Project) is a new mixed-used commercial campus geared toward the entertainment and creative industries. The Project would be located within an 82,011-square-foot (1.88-acre) site at the northeast corner of the intersection of Sunset Boulevard and Highland Avenue at 6767 West Sunset Boulevard (Project Site) in the Hollywood Community Plan area of the City of Los Angeles (City). The Project would include the development of a new 503,520-square-foot building comprised of approximately 443,170 square feet of creative office space; 5,330 square feet of retail/restaurant space; and 55,020 square feet of commercial space anticipated to be occupied by recording and production studio and ancillary uses, including an auditorium and live performance venue. The proposed uses would be allocated throughout the new building, which would consist of two interconnected towers—a 12-story tower and a 14-story tower constructed with four shared floors. The maximum height of the taller of the two interconnected towers would be 285 feet. In accordance with the Los Angeles Municipal Code (LAMC), the Project would provide 1,000 vehicular parking spaces within six subterranean parking levels. The Project would remove 10 of the 12 non-protected street trees and all six non-protected on-site trees and replace them with 31 new street trees and eight new palms along the streets. It is estimated that approximately 367,000 cubic yards of export would be hauled from the Project Site. The existing buildings totaling approximately 67,891 square feet would be demolished to accommodate the Project. Additionally, the Project proposes to merge the existing alley that runs through the south end of the Project Site into the Project Site, increasing the lot area from 82,011 square feet to 83,920 feet. Upon completion, the Project would result in a total floor area of up to 503,520 square feet with a floor area ratio (FAR) of 6:1.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located at 6749-6767 West Sunset Boulevard, 1518-1538 North Highland Avenue, and 1505-1511 and 1533-1539 North McCadden Place within the Hollywood Community Plan Area of the City. As shown in Figure 1 and Figure 2 on pages 8 and 9, the Project Site is bounded by Selma Avenue to the north, North McCadden Place to the east, Sunset Boulevard to the south, and North Highland Avenue to the west. Regional access to the Project Site is provided by the SR-2 and US-101, which are accessible within 1.5 miles of the Project Site. Local access to the Project Site is provided by several local streets and avenues, including Selma Avenue, North McCadden Place, West Sunset Boulevard, and North Highland Avenue.

3.2.2 Existing Conditions

The Project Site is currently occupied with a two-story, 24,114-square-foot shopping center with one subterranean parking level; a single-story, 16,370-square-foot commercial nursery; a single-story, 21,795-square-foot private school; a single-story, 5,612-square-foot private school building, and associated surface parking areas. Vehicular access to the Project Site is currently available via driveways

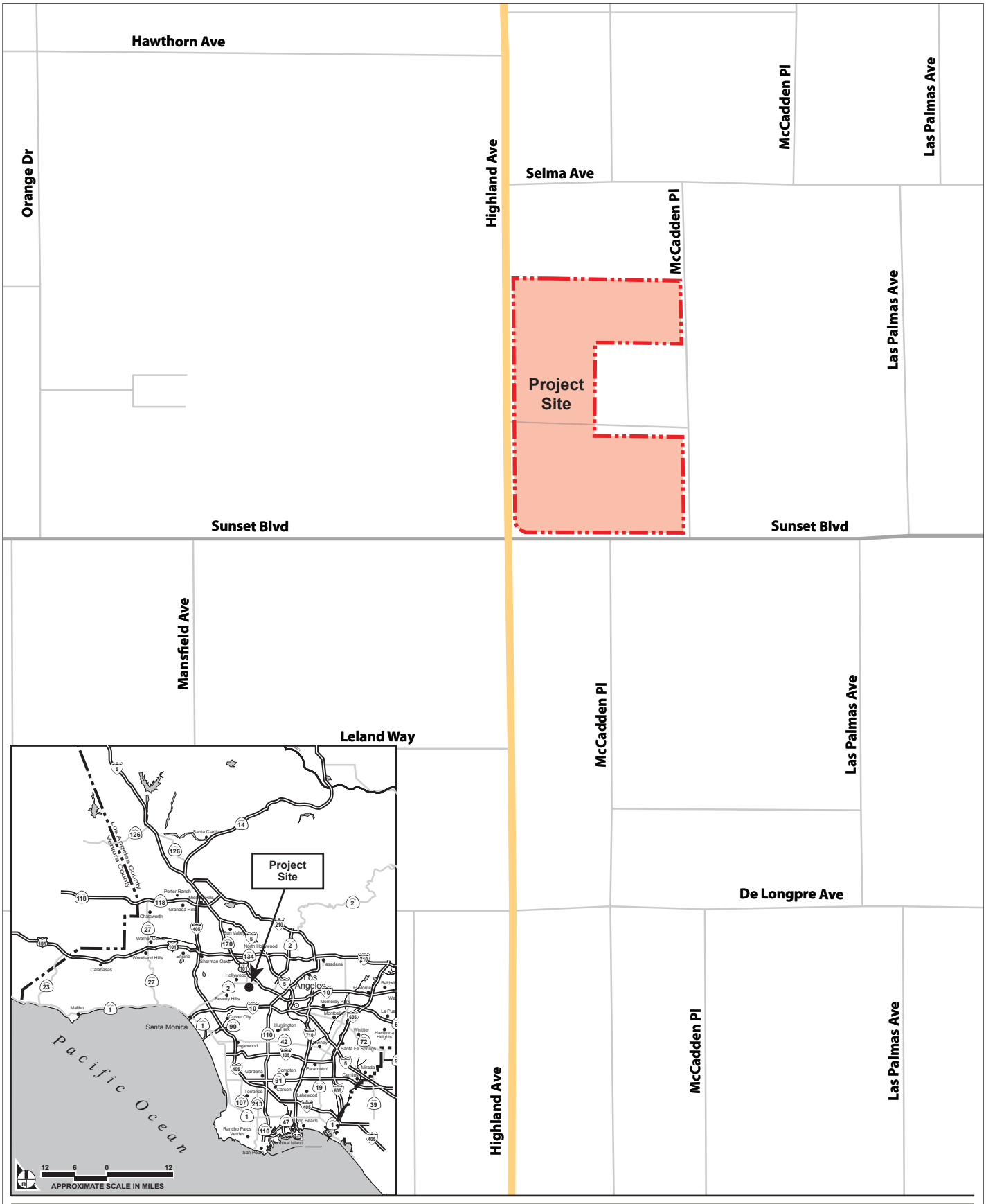

Figure 1
Project Location Map

Source: ArcGIS, 2022; Eyestone Environmental, 2022.

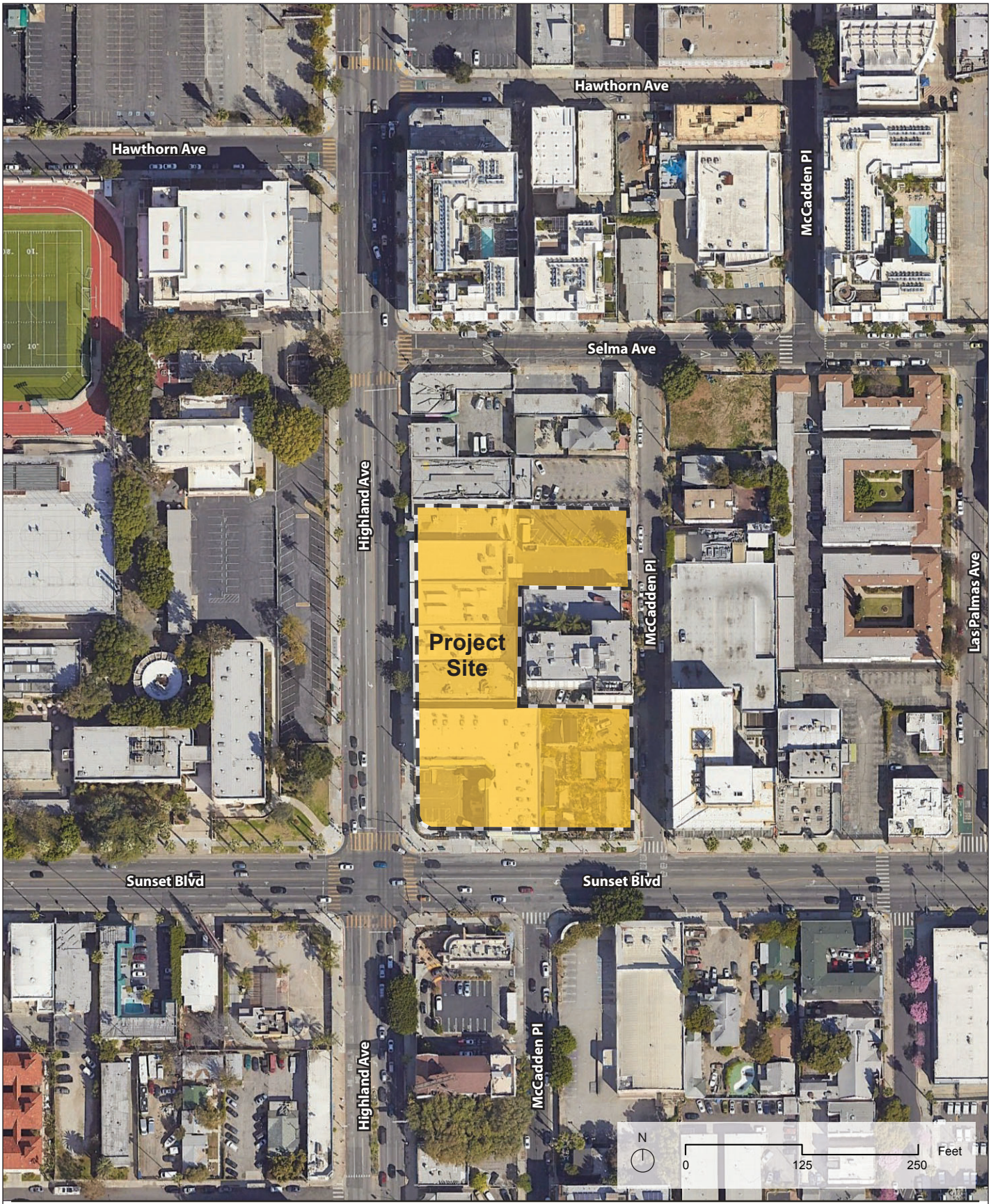

Figure 2
Aerial Photograph of Project Site and Vicinity

Source: Google Earth Pro, 2022; Eyestone Environmental, 2022.

along North Highland Avenue and Sunset Boulevard. Pedestrian access to the Project Site is currently provided along Sunset Boulevard, North Highland Avenue, North McCadden Place, and Selma Avenue.

Landscaping within the Project Site includes ornamental trees and landscaping. A total of 18 trees were inventoried, including six on-site trees and 12 street trees. Street trees and trees within the Project Site consist of various non-native species, including one *Phoenix dactylifera*, five *Washingtonia robusta*, two *Alnus rhombifolia*, four *Magnolia grandiflora*, two *Handroanthus impet*, two *Jacaranda mimosifolia*, one *Olea eurpaea*, and one *Metrosideros excelsa*. In order to describe tree size, the Urban Forestry considers any tree "significant" if it has a trunk diameter of eight inches or greater. As such, all of the six on-site trees are considered to be "significant" as defined by the City's Planning Division based on their trunk diameter size of eight inches or greater. None of the six on-site trees are considered to be protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.[2,3]

The Project Site is located within the Hollywood Community Plan area and has a Regional Center Commercial General Plan Land Use designation with the corresponding zones of C4-2D-SN (Commercial zone, Height District 2 with Development Limitation, Hollywood Signage Supplemental Use District) and C4-2D (Commercial zone, Height District 2 with Development Limitation). Pursuant to the LAMC, the C4 Zone permits a wide array of land uses including commercial, office, residential, retail, and hotel uses. Height District 2, in conjunction with the C4 Zone, typically does not impose a maximum building height limitation and permits a maximum 6:1 FAR; however, pursuant to the "D" Limitation (per Ordinance No. 165,660 SA220, adopted in 1990) the total floor area permitted is a maximum FAR of 2:1 with a maximum height of 45 feet; however, a project could exceed the 2:1 FAR subject to certain conditions as set forth in the existing "D" Limitation.[4] The Project Site is also located within the boundaries of the Hollywood Redevelopment Plan, which establishes a base FAR limit of 4.5:1 for all development with a land use designation of Regional Center. The Redevelopment Plan permits FAR in excess of 4.5:1 not to exceed 6:1 FAR, provided that the proposed development furthers the goals and intent of the Hollywood Redevelopment Plan and the Hollywood Community Plan, and that permitting the proposed development serves a public purpose or objective. The SN designation indicates that these parcels are located within the Hollywood Signage Supplemental Use District (HSSUD), where signage is subject to unique characteristics of which can be enhanced by the imposition of special sign regulations designed to

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2 Paul Lewis Landscape Architect, Tree Report for 1534 Highland Ave. Los Angeles, CA 90028, November 3, 2020. See Appendix IS-1 of this IS.

3 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.

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

enhance the theme or unique qualities of that district, or which eliminate blight through a sign reduction program.

The Project Site is also identified as being located in a Transit Priority Area (TPA), as defined by Senate Bill (SB) 743 and City Zoning Information File (ZI) 2452.[5] The Project Site is well served by a variety of public transit options along North Highland Avenue and Sunset Boulevard provided by the Los Angeles County Metropolitan Transit Authority (Metro) and the Los Angeles Department of Transportation (LADOT). Specifically, transit options in the vicinity of the Project Site include the Hollywood/Highland station of the Metro B (Red) Line; Metro bus lines 2, 237, and 656; and DASH Hollywood Clockwise and Counterclockwise.

3.2.3 Surrounding Land Uses

The area surrounding the Project Site is highly urbanized and includes a mix of low- to mid-rise buildings containing a variety of uses, including institutional, office, commercial, and residential uses. Land uses immediately surrounding the Project Site include commercial uses to the north; a restaurant and vacant building to the south; Hollywood High School to the west; and restaurant, residential, and office uses to the east. Additionally, as shown in Figure 2 on page 9, a 2-story apartment building and a five-story apartment building are also located directly east of the Project Site, along McCadden Place.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

As summarized below and in Table 1 on page 12, the Project would include the development of a new 503,520-square-foot building comprised of 443,170 square feet of creative office space; 5,330 square feet of retail/restaurant space; and 55,020 square feet of commercial space anticipated to be occupied by recording and production studio and ancillary uses, including an auditorium and live performance venue.

As shown in Figure 3 through Figure 6 on pages 13 through 16, the proposed uses would be allocated throughout the new building, which would consist of two interconnected towers—a 12-story tower and a 14-story tower constructed with four shared floors. The figures show the floors that consist of multiple uses. The ground floor would include recording and production studio, creative office, retail/restaurant, and studio accessory uses. The second floor would also consist primarily of recording uses as well as creative office and studio accessory uses. The fifth floor would contain creative office uses and the event terrace as well as a kitchen and a lobby that each connect to the event terrace. The third through 13th floors would include creative office uses and the 14th floor would include recording and production studio as well as studio accessory uses. The maximum height of the two interconnected towers would be 285 feet.

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

Table 1
Summary of Existing and Proposed Floor Area[a]

Land Use	Floor Area
Existing (All to Be Removed)	
Shopping Center	24,114 sf
Nursery	16,370 sf
Private School	27,407 sf
Total Existing Floor Area to Be Removed	*67,891 sf*
New Construction	
Creative Office Space	443,170 sf
Retail/Restaurant	5,330 sf
Recording and Production Studio	55,020 sf
Total New Construction	*503,520 sf*
Total Floor Area Upon Completion	**503,520 sf**

sf = square feet

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

Source: HKS Architects Inc., 2022.

In accordance with the LAMC, the Project would provide 1,000 vehicular parking spaces within six subterranean parking levels. Additionally, the Project proposes to merge the existing alley that runs through the south end of the Project Site into the Project Site, increasing the lot area from 82,011 square feet to 83,920 square feet. As part of the Project, the existing on-site buildings totaling approximately 67,891 square feet would be removed. The Project would remove 10 of the 12 non-protected street trees and all six non-protected on-site trees and replace them with 31 new street trees and eight new palms along the streets. It is estimated that approximately 367,000 cubic yards of export would be hauled from the Project Site. Upon completion, the Project would result in a total floor area of up to 503,520 square feet with a floor area ratio (FAR) of 6:1.

3.3.2 Design and Architecture

As shown in the conceptual renderings provided in Figure 7 and Figure 8 on pages 17 and 18, respectively, the Project is designed in a contemporary architectural style with two interconnected towers—a 12-story tower and a 14-story tower with four shared floors and an event terrace at the 5th floor. The ground floor would include recording and production studio, creative office, retail/restaurant, and studio accessory uses. The second floor would also consist primarily of recording uses as well as creative office and studio accessory uses. The third through 13th floors would include creative office uses and the 14th floor would include recording and production studio as well as studio accessory uses. The 14-story tower would be up to 285 feet in height, the 12-story tower would be up to 240 feet in height, and

Figure 3
Ground Level Floor Plan

Source: HKS, 2021.

Figure 4
Level 2 Floor Plan

Source: HKS, 2021.

Figure 5
Level 5 Floor Plan

Source: HKS, 2021.

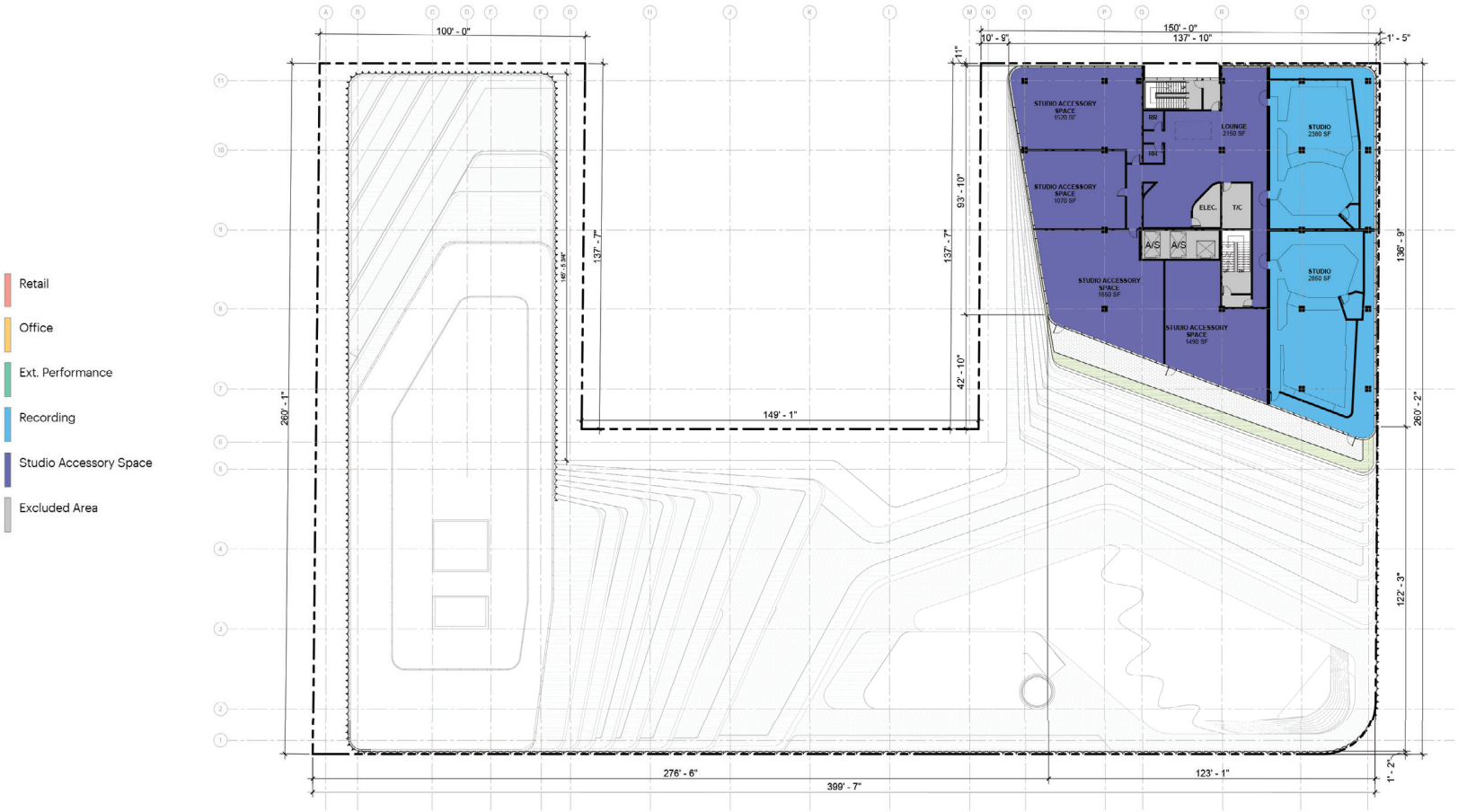

Figure 6
Level 14 Floor Plan

Source: HKS, 2021.

Figure 7
Conceptual Rendering

Source: HKS, 2021.

Figure 8
Conceptual Rendering

Source: HKS, 2021.

the event terrace on the fifth floor between the two towers would be located at a height of approximately 70 feet and include a 10-foot extension of the exterior facade. The exterior aesthetic of the building would appear highly permeable and open through the use of outdoor terraces and transparent architectural materials. The proposed building would be oriented toward Highland Avenue and Sunset Boulevard and would feature gradual stepbacks of its massing through the proposed outdoor cascading landscaped terraces provided from the second floor through the roof level. The irregular shaped terraces would each be differently shaped and differently sized on every level. These terraces would accent the building and provide its unique shape and design. Because the outdoor landscape terraces would be designed along the center of the building and along the northeast corner of the building on McCadden Place, the building would appear as two towers above the fifth floor and its massing would be significantly reduced. As shown in the conceptual rendering provided in Figure 9 on page 20, the fifth floor of the building would incorporate an event terrace and outdoor landscaped terrace on the southside near the corner of Sunset Boulevard and Highland Avenue.

To create a pedestrian oriented area, the Project proposes two publicly accessible plazas along Sunset Boulevard and Highland Avenue. The Project also proposes retail/restaurant space on the ground floor, and provides pedestrian entrances to all creative office lobbies on the ground floor. A staircase and elevator further provide direct public access from the ground level to the fifth floor terrace. The architectural design uses a material palette including perforated metal screen, low-e vision glass, brise-soleil, louvers, metal fascia, decorative paneling, and stone veneer, to create a modern, simple, and visually appealing façade.

Additionally, while the Project proposes to merge the existing alley and construct over the alley on the third through 14th floor, a pedestrian crosswalk, widened pedestrian walkways, and a second-floor pedestrian bridge would be provided to facilitate pedestrian traffic and crossing.

3.3.3 Open Space and Landscaping

Although there are no open space requirements for commercial uses, the Project would include approximately 28,593 square feet of landscaped open space, including 12,810 square feet of open space at the ground level and 15,783 square feet of open space on the fifth level. Specifically, on the ground level, the Project would include a publicly accessible plaza on the corner of Highland Avenue and Sunset Boulevard. Level five would include a 15,783-square-foot event terrace with seating areas located between the interconnected towers and would also include a stage. Level six would include terraces, located between and alongside the interconnected towers. The Project would also include terraces that overlook the event terrace on levels seven through 12 of the 12-story tower, and on levels seven through 14 of the 14-story tower.

The Project would remove 10 of the 12 non-protected street trees and all six non-protected on-site trees and replace them with 31 new street trees and eight new palms along the streets. These would include California bay trees, which would serve as shade canopy trees, along entry areas and tall California fan palms on the corner of North Highland Avenue and Sunset Boulevard to continue existing palm alleys on both streets. Furthermore, the Project would include 343 linear feet of vines and green wall planters along the walls which face the apartment buildings adjacent to the Project Site to the east. Lastly, the Project would plant native grasses and shrubs on sidewalk medians as well as install a total of 12 public benches, including three on Sunset Boulevard and nine on Highland Avenue. All street tree removals

Figure 9
Conceptual Rendering

Source: HKS, 2021.

are subject to Urban Forestry Division standards and approvals, and the approval of the Board of Public Works.

3.3.4 Access, Circulation, and Parking

Vehicular access to the Project Site would be provided from the existing alley that bisects the site as well as from the Project's North McCadden Place frontage. This alley will be vacated and reconstructed. A drop-off area would be provided alongside the public alley, and ingress and egress would be provided via a two-way driveway ramp along North McCadden Place located in the southeast portion of the Project Site, which would provide access to the six-level subterranean parking garage, where all vehicular parking spaces would be located.

Pedestrian access to the Project Site would be provided at several access points around the perimeter of the Project Site. In particular, creative office lobbies would be located on Highland Avenue and Sunset Boulevard. Access for trash pickup and other freight vehicles would be provided via a loading dock entry alongside the public alley that bisects the Project Site.

The Project would be required to and would provide 1,000 vehicle parking spaces as required by the LAMC. Additionally, the Project would include 288 short-term and 100 long-term bicycle parking spaces in accordance with LAMC Section 12.21-A.16(a)(2). Short-term bicycle parking spaces would be provided on the ground level adjacent to the alley and long-term bicycle parking spaces would be provided on Level 2 along the Project's McCadden Place frontage, with a stairway provided for access. Locker rooms would also be provided beside the long-term bicycle parking area and bike racks would be provided on all frontages of the Project Site. Further, pursuant to Ordinance No. 186,485, 30 percent of the Project's parking spaces will be designated as Electric Vehicle (EV) spaces capable of supporting future electric vehicle supply equipment (EVSE) and 10 percent of the spaces will be further equipped with EV charging stations (EVCS).

3.3.5 Lighting and Signage

Proposed signage would include mounted Project identity signage, general ground-level and wayfinding pedestrian and vehicular signage, and security markings in compliance with code requirements. Project identity signage would be visible from off-site vehicular and pedestrian traffic and serve as identifiers for the Project. Wayfinding signs would be located at the parking garage entrances and exits, at building lobbies, and on the ground level throughout the Project Site, and would be integrated into the overall design of the campus. No digital or off-site signage would be provided. All proposed signage would be designed to be aesthetically compatible with the existing and proposed architecture of the Project Site and would comply with all LAMC and the Hollywood Signage Supplemental Use District.

All Project lighting would comply with current energy standards and codes while providing efficient and effective on-site lighting for the operation of an office campus. The exterior shaped bris-sole façade will have LED lighting incorporated into the design which will project surface light and imagery; it would not project advertisements. Low-level exterior lights would be provided to accent signage, architectural features, and landscaping elements. In addition, low-level exterior lights would be located adjacent to the proposed buildings, along pathways and the Project Site perimeter for aesthetic, security, and wayfinding purposes. Light sources would be shielded and/or directed toward the Project Site to minimize light spill

to neighboring buildings and surrounding areas, and to reduce sky-glow and glare in order to improve nighttime visibility. The Project would comply with City conditions for new or relocated streetlights.

3.3.6 Sustainability Features

The Project would be designed and constructed to incorporate environmentally sustainable building features equivalent to a Gold certification under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) Rating System for new construction, and environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen Code. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The Project would incorporate sustainability features for alternative, low-carbon modes of transportation, such as a protected bicycle storage facility and electric vehicle charging infrastructure. The Project would also incorporate water conservation features through low-water use plant selections and ultra-low flow indoor water fixtures. Additionally, the Project would include exterior and interior lighting that would meet the requirements of the California Energy Commission Building Energy Efficiency Standards—Title 24, version 2022 and the National Electrical Code.

In accordance with CALGreen requirements, the Project would also ensure that at least 10 percent of the total roof area of the new building would be solar-ready. Furthermore, as noted above the Project would provide parking spaces prewired to support future EVCS as well as parking spaces equipped with EVCS. Pursuant to City of Los Angeles Ordinance 186,485 and Ordinance 186,488, 30 percent of the parking spaces in the Project would be capable of supporting future EVSE. Additionally, 10 percent of spaces are required to be further improved with EVCS.

3.3.7 Anticipated Construction Schedule

Construction of the Project would commence with demolition of the existing buildings and surface parking areas. This phase would be followed by grading and excavation for the subterranean parking, which would extend to a depth of 87 feet below ground surface. The building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to commence in 2025 and be completed in 2028. It is estimated that approximately 367,000 cubic yards of export would be hauled from the Project Site. Additionally, the proposed haul route for the Project would be located along North Highland Avenue north to SR-101 south.

3.4 REQUESTED PERMITS AND APPROVALS

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

- Pursuant to LAMC Section 12.32-Q, a Vesting Zone/Height District Change from C4-2D-SN and C4-2D to C2-2-SN for portions of the Project Site with addresses of 6749 to 6767 W. Sunset Boulevard, 1518 to 1538 N. Highland Avenue, and 1505 to 1511 N. McCadden Place,

and from C4-2D to C2-2 for portions of the Project Site with addresses of 1533 to 1539 N. McCadden Place.

- Pursuant to LAMC Section 12.24-W1, a Main Conditional Use Permit for Alcohol (MCUP) to allow to permit the sale and dispensing of a full line of alcoholic beverages for on-site consumption at up to three establishments.

- Pursuant to LAMC Section 12.24-W18, a Conditional Use Permit for Live Entertainment (CUX) for live entertainment and dancing in connection with a 15,783-square-foot outdoor event space located on the shared fifth floor.

- Pursuant to LAMC Section 16.05, a Site Plan Review to allow the construction of 503,520 square feet of mixed-use development containing creative office, recording and production studio and ancillary uses, a live performance venue, and accessory related uses with on-site associated parking.

- Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map for the (1) division of land to create five or more legal parcels/lots; (2) vacation and merger of an existing public alley that runs through the Project Site; (3) waiver of dedication and improvement requirements on McCadden Place and Sunset Boulevard; and (4) haul route approval.

- Any findings that may be required under the Hollywood Redevelopment Plan and the LAMC, including the proposed development in excess of 4.5:1 FAR up to but not to exceed 6:1 FAR within the Regional Center Commercial designation.

- 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 public agencies have been identified for the Project.

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill (SB) 743 (Public Resources Code [PRC] Section 21099(d)) sets forth guidelines for evaluating project transportation impacts for transit-oriented infill projects 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 "infill site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

The related City of Los Angeles (City) Department of City Planning Zoning Information File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA."[6]

PRC Section 21099 applies to the Project. Specifically, pursuant to PRC Section 21099, the Project is an employment center project located on an infill site.[7] *The Project Site is also located within a TPA because it is located within 0.5 mile of an existing major transit stop. Transit options in the vicinity of the Project Site include the Hollywood/Highland station for the Metro B (Red) Line; Metro bus lines 2, 237, and 656; and DASH Hollywood Clockwise and Counterclockwise. 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. Therefore, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment and do not require evaluation under CEQA. The analysis regarding aesthetics in this Initial Study is for informational purposes only and not for determining whether the Project will result in significant aesthetic impacts on the environment. As such, nothing in the*

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

7 PRC Section 21099(a) 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."

aesthetic impact discussion in this Initial Study shall trigger the need for any CEQA Findings of Fact, CEQA analysis, or CEQA mitigation measures.

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

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

Less Than Significant Impact. A scenic vista is a panoramic view of a valued visual resource.[8] Panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are typically associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies. Focal views are also relevant when considering this question from Appendix G of the CEQA Guidelines. Examples of focal views include natural landforms, public art/signs, historic buildings, and important trees.

With regard to panoramic views, valued visual resources in the vicinity of the Project Site include the Hollywood Hills and the Hollywood Sign, City-designated Historic-Cultural Monument No. 111, to the distant north. With regard to focal views, valued visual resources in the vicinity of the Project Site include

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

historical resources such as the Hollywood High School Historic District to the west of the Project Site, across North Highland Avenue.[9]

As shown in Figure 10 through Figure 12 on pages 27 through 29, respectively, within the immediate vicinity of the Project Site, public views of the Hollywood Hills are limited to the south side of West Sunset Boulevard, west of the Project Site, and are not available from North McCadden Place or North Highland Avenue due to distance and intervening development blocking such views. Public views of the Hollywood Sign are not available due to distance and intervening development blocking such views. Views would continue to be available on an intermittent basis along nearby roadway segments following development of the Project. In particular, given the Project's Site's location at the corner of West Sunset Boulevard and North Highland Avenue, the Project would not block existing views of the Hollywood Hills which are presently available from the south side of West Sunset Boulevard, west of the Project Site. Therefore, the Project would not have a substantial adverse effect on existing views of the Hollywood Hills and Hollywood Sign.

With regard to focal views of nearby historical resources, the Project would be separated from the Hollywood High School Historic District by North Highland Avenue. Therefore, views of this historic district would remain, and the Project would not have a substantial adverse effect on existing focal views of nearby historical resources. Potential impacts to historical resources are discussed below in Checklist Question No. V.b of this Initial Study and will be addressed in the EIR.

Overall, as the area is fully developed and highly urbanized, the Project would not have a substantial adverse effect on a publicly available scenic vista. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impact would not be considered a significant impact on the environment. Therefore, impacts related to a publicly available scenic vista would be less than significant, and no further evaluation of this topic in the 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?

No Impact. The Project Site is not located along a state scenic highway. The nearest officially eligible state scenic highway is along the Foothill Freeway (I-210), approximately 11.2 miles northeast of the Project Site.[10] Therefore, the Project would not substantially damage scenic resources within a state scenic highway as no scenic highways are located adjacent to the Project Site. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impact would not be considered a significant impact on the environment. Therefore, no impacts to scenic resources would occur, and no further analysis of this topic in the EIR is required.

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9 City of Los Angeles, HistoricPlacesLA, http://historicplacesla.org/search, accessed April 22, 2022.

10 California Department of Transportation, Scenic Highways, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed April 22, 2022.

Figure 10
View From North McCadden Place Looking North

Source: Google Earth, 2022.

Figure 11
View From West Sunset Boulevard Looking North

Source: Google Earth, 2022.

Figure 12
View From North Highland Avenue Looking North

Source: Google Earth, 2022.

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. The Project is located in an urbanized area. As such, this analysis focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

With regard to zoning, as discussed in Section 3, Project Description, of this Initial Study, the Project Site is located within the Hollywood Community Plan area and has a Regional Center Commercial General Plan land use designation with the corresponding zones of C4-2D-SN (Commercial zone, Height District 2 with Development Limitation, Hollywood Signage Supplemental Use District) and C4-2D (Commercial zone, Height District 2 with Development Limitation). Pursuant to the Los Angeles Municipal Code (LAMC), the C4 Zone permits a wide array of land uses including commercial, office, residential, retail, and hotel uses. Height District 2, in conjunction with the C4 Zone, typically does not impose a maximum building height limitation and permits a maximum 6:1 FAR; however, pursuant to the "D" Limitation (per Ordinance No. 165,660 SA220, adopted in 1990) the total floor area permitted is a maximum FAR of 2:1 with a maximum height of 45 feet; however, a project could exceed the 2:1 FAR subject to certain conditions as set forth in the existing "D" Limitation.[11] . The Project Site is also located within the boundaries of the Hollywood Redevelopment Plan, which establishes a base FAR limit of 4.5:1 for all development with a land use designation of Regional Center. The Hollywood Redevelopment Plan permits FAR in excess of 4.5:1 not to exceed 6:1 FAR provided that the proposed development furthers the goals and intent of the Hollywood Redevelopment Plan and the Hollywood Community Plan, and that permitting the proposed development serves a public purpose or objective. The Project Site is also identified as being located in a TPA, as defined by SB 743 and ZI No 2452.[12] The SN designation indicates that these parcels are located within the Hollywood Signage Supplemental Use District (HSSUD), where signage is subject to unique characteristics of which can be enhanced by the imposition of special sign regulations designed to enhance the theme or unique qualities of that district, or which eliminate blight through a sign reduction program.

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

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

As discussed in detail in Section 3, Project Description, of this Initial Study, the Project would result in up to 503,520 square feet of commercial floor area with a maximum floor area ratio (FAR) of up to 6.0:1, and several discretionary approvals are sought as part of the Project. These include a Vesting Zone/Height District Change from C4-2D-SN to C2-2-SN and from C4-2D to C2-2; a Redevelopment Plan Project Administrative Review; and land use approvals that may be required under the Hollywood Redevelopment Plan and the LAMC, including approval to exceed the Plan's 4.5 to 1 FAR limit for all properties in the Regional Center Commercial designation. With approval of these discretionary actions, the Project would be consistent with applicable zoning regulations regarding scenic quality including those related to height and FAR.

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

Citywide General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element) provides direction regarding the City's vision for future development 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).[13] The Project Site is currently occupied with a two-story, 24,114-square-foot shopping center; a single-story, 16,370-square-foot commercial nursery; a single-story, 21,795-square-foot private school; a single-story, 5,612-square-foot private school building, and associated surface parking areas in a highly urbanized area that is generally developed with a mix of institutional, commercial and residential uses.

The Project would upgrade the quality of development by constructing a new mixed-used commercial campus designed in a contemporary architectural style with two interconnected towers—a 12-story tower and a 14-story tower with four shared floors and an event terrace at the 5th floor. The exterior aesthetic of the building would appear highly permeable and open through the use of outdoor terraces and transparent architectural materials. The proposed building would be oriented toward Highland Avenue and Sunset Boulevard and would feature gradual stepbacks of its massing through the proposed outdoor cascading landscaped terraces provided from the second floor through the roof level. The irregular shaped terraces would each be differently shaped and differently sized on every level. These terraces would accent the building and provide its unique shape and design. Because the outdoor landscape terraces would be designed along the center of the building and along the northeast corner of the building on McCadden Place, the building would appear as two towers above the fifth floor and its massing would be significantly reduced. The fifth floor of the building would incorporate an event terrace and outdoor landscaped terrace on the southside near the corner of Sunset Boulevard and Highland Avenue. The architectural design uses a material palette including perforated metal screen, low-e vision glass, brise-soleil, louvers, metal

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

fascia, decorative paneling, and stone veneer, to create a modern, simple, and visually appealing façade. These design elements would support Policy 5.5.6 in particular, which directs projects to identify building and site design elements for commercial or mixed-use streets in centers, that may include: the height above which buildings must step back; the location of the building base horizontal articulation; and other design elements.

In further support of Objective 5.5 to improve the quality of the public realm, the Project proposes two publicly accessible plazas along Sunset Boulevard and Highland Avenue, respectively, which would create a pedestrian oriented area and enhance pedestrian amenities surrounding the Project Site. The Project also proposes a retail space on the ground floor and provides pedestrian entrances to all office lobbies on the ground floor. A staircase and elevator further provide direct public access from the ground level to the fifth floor terrace.

Additionally, while the Project proposes to merge the existing alley and construct over the alley on the third through 14th floor, a pedestrian crosswalk, widened pedestrian walkways, and a second-floor pedestrian bridge would be provided to facilitate pedestrian traffic and crossing. The Project would also improve the pedestrian experience along Sunset Boulevard and North Highland Avenue by providing new street trees and installing public benches. The existing six on-site trees and 10 of the 12 street trees, none of which are protected trees under the City's Protected Tree and Shrubs Ordinance No. 186,873, would be replaced with 31 new street trees and eight new palms along the street for a total of 39 new trees and palms. These would include California bay trees, which would serve as shade canopy trees, along entry areas and tall California fan palms on the corner of North Highland Avenue and Sunset Boulevard to continue existing palm alleys on both streets. Two of the 12 street trees would be preserved. Lastly, the Project would plant native grasses and shrubs on sidewalk medians. As such, the Project would improve the quality of the public realm, and would support Policy 5.5.4 in particular, which directs projects to determine the appropriate urban design elements at the neighborhood level, such as sidewalk width and materials, streetlights and trees, bus shelters and benches, and other street furniture. In addition, proposed signage would comply with LAMC and HSSUD signage regulations and would be designed to be aesthetically compatible with the proposed architecture of the Project and its surroundings.

Overall, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Urban Form and Neighborhood Design Chapter and, therefore, would not conflict with the Framework Element policies regarding scenic quality.

Hollywood Community Plan

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

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

As part of the Project, new power lines would be placed underground consistent with the public improvements section of the Hollywood Community Plan and, therefore, would not conflict with the Hollywood Community Plan objective and policy related to scenic quality.

Hollywood Redevelopment Plan

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

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

As previously discussed, the Project would enhance the built environment in the surrounding neighborhood and upgrade the quality of development. Specifically, the Project would upgrade the quality of development by replacing the existing two-story shopping center; single-story commercial nursery; single-story private school; single-story, private school building, and associated surface parking areas with a new mixed-used commercial campus designed in a contemporary architectural style with two interconnected towers—a 12-story tower and a 14-story tower with four shared floors and an event terrace at the 5th floor. The exterior aesthetic of the building would appear highly permeable and open. Additionally, the proposed building would feature gradual stepbacks of its massing, the irregular shaped terraces would accent the building and provide its unique shape and design, and the building would appear as two towers above the fifth floor. The fifth floor of the building would incorporate an event terrace and outdoor landscaped terrace. Lastly, the architectural design uses a material palette including perforated metal screen, low-e vision glass, brise-soleil, louvers, metal fascia, decorative paneling, and stone veneer, to create a modern, simple, and visually appealing façade.

To create a pedestrian oriented area and enhance pedestrian amenities surrounding the Project Site, the Project proposes two publicly accessible plazas along Sunset Boulevard and Highland Avenue. The Project also proposes a retail space on the ground floor, and provides pedestrian entrances to all office lobbies on the ground floor. A staircase and elevator further provide direct public access from the ground level to the fifth floor terrace.

Additionally, while the Project proposes to merge the existing alley and construct over the alley on the third through 14th floor, a pedestrian crosswalk, widened pedestrian walkways, and a second-floor pedestrian bridge would be provided to facilitate pedestrian traffic and crossing. Parking areas would also be lit to maximize visibility and reduce areas of concealments. Further, proposed signage would comply with LAMC and HSSUD signage regulations and would be designed to be aesthetically compatible with the proposed architecture of the Project and its surroundings.

The Project would also enhance the built environment in the surrounding neighborhood by improving the pedestrian experience along Sunset Boulevard and North Highland Avenue by providing new street trees and installing public benches. The existing six non-protected on-site trees and 10 of the 12 non-protected

street trees would be replaced at a 1:1 ratio with 31 new street trees and eight new palms along the street for a total of 39 new trees and palms, which would exceed the Bureau of Street Services, Urban Forestry Division's requirements to replace street trees on a 2:1 basis. These would include California bay trees, which would serve as shade canopy trees, along entry areas and tall California fan palms on the corner of North Highland Avenue and Sunset Boulevard to continue existing palm alleys on both streets. Two of the 12 street trees would be preserved. All street tree removals are subject to Urban Forestry Division standards and approvals, and the approval of the Board of Public Works. Lastly, the Project would plant native grasses and shrubs on sidewalk medians.

Overall, the Project would support and not conflict with the Hollywood Redevelopment Plan's goal to improve the quality of the environment and provide a safe environment.

Citywide Urban Design Guidelines

The Citywide Design Guidelines, adopted October 24, 2019, establish ten guidelines to carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case. A full evaluation of the Project's consistency with the Citywide Design Guidelines will be included in the land use section of the EIR.

In summary, for all the reasons stated above, the Project would not conflict with applicable zoning and other regulations governing scenic quality. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impact would not be considered significant. Therefore, no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Nighttime illumination of varying intensities is characteristic of most urban land uses, including those in the Project area. New light sources introduced by a project may increase ambient nighttime illumination levels. Additionally, nighttime spillover of light onto adjacent properties has the potential to interfere with certain functions, including vision, sleep, privacy, and general enjoyment of the natural nighttime condition. The significance of the impact depends on the type of use(s) affected, proximity to the affected use(s), the intensity of the light source, and the existing ambient light environment. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and institutional uses, and natural areas.

Glare occurs during both daytime and nighttime hours. Daytime glare is caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials, and, to a lesser degree, from broad expanses of light-colored surfaces. Daytime glare generation is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials from which the sun can reflect, particularly following sunrise and prior to sunset. Daytime glare generation is typically related to sun angles, although glare resulting from reflected sunlight can occur regularly at certain times of the year. Glare can also be produced during evening and nighttime hours by artificial light directed toward a light-sensitive land use.

Construction

While the majority of Project construction would occur during daylight hours, there is a potential that construction could occur in the evening hours and require the use of artificial lighting, particularly during the winter season when daylight is no longer sufficient earlier in the day. Outdoor lighting sources, such as floodlights, spot lights, and/or headlights associated with construction equipment and hauling trucks, typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of Project construction. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements.[14] Additionally, as part of the Project, construction lighting would be shielded to minimize the potential for light spillover to adjacent properties. Project construction lighting, while potentially bright, would be focused on the particular area undergoing work.

Daytime glare could potentially occur during construction activities if reflective construction materials are positioned in highly visible locations where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area, and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Furthermore, temporary construction fencing would be placed along the periphery of construction activity to screen public views at the street level from off-site locations. Therefore, any daytime or nighttime glare associated with Project construction activities would be minimal and temporary in nature.

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

Operation

The exterior shaped bris-sole façade will have LED lighting incorporated into the design which will project surface light and imagery. Low-level exterior lights would be provided to accent signage, architectural features, and landscaping elements. The Project would also include low-level exterior lights along pathways for aesthetic, security, and wayfinding purposes. In addition, low-level lighting to accent signage would be incorporated. All lighting would comply with current energy standards and regulations, as well as design requirements. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light spill-over from the Project Site in the direction of the adjacent residential uses, reducing sky-glow, and improving nighttime visibility through glare reduction. All exterior and interior lighting would meet high energy efficiency requirements utilizing light-emitting diode (LED) or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way

[14] LAMC Chapter 9, Article 3, Section 93.0117(b) provides that no exterior light source may cause more than 2 foot-candles (21.5 lx) of light intensity or generate direct glare onto exterior glazed windows or glass doors; elevated porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any property containing a residential unit or units.

would comply with applicable City regulations. In addition, all lighting would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

he Project would not include signage with flashing or mechanical properties. Project signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

Daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. In general, sun reflection that has the greatest potential to interfere with driving occurs from the lower stories of a structure. Sun reflection from the Project would occur during periods in which the sun is low on the horizon and when the point of reflection within the Project Site is in front of the driver, in the direction of travel. The Project would feature a variety of surface materials, including perforated metal screen, low-e vision glass, brise-soleil, louvers, metal fascia, decorative paneling, and stone veneer, to create a modern, simple, and visually appealing façade. As part of the Project, glass used in building façades would include high-performance coatings and the building shape would be designed to minimize glare from reflected sunlight.

Nighttime glare could result primarily from on-site illumination and vehicle headlights. As described above, the Project's illuminated signs would not exceed the prescribed LAMC lighting requirements. Furthermore, while headlights from vehicles entering and exiting the Project Site would be visible during the evening and nighttime hours, such lighting sources would be typical for the area. Thus, nighttime glare would not result in a substantial adverse impact.

Based on the above, with adherence to regulatory requirements, lighting associated with Project operation would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetic impacts would not be considered significant. 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?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

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

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with a two-story shopping center; a single-story commercial nursery; a single-story private school; a single-story private school building; and associated surface parking areas. 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.[15,16] 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.

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[15] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5547-020-019, -041, -046, and -047 http://zimas.lacity.org/, accessed April 22, 2022.

[16] 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%22

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

No Impact. The Project Site is zoned as C4-2D-SN (Commercial zone, Height District 2 with Development Limitation, Hollywood Signage Supplemental Use District) and C4-2D (Commercial zone, Height District 2 with Development Limitation). Pursuant to the LAMC, the C4 Zone permits a wide array of land uses including commercial, office, residential, retail, and hotel uses. The Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area. 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.[17] 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 two-story shopping center; a single-story commercial nursery; a single-story private school; a single-story private school building; and associated surface parking areas. 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.[18] 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.

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

(Footnote continued from previous page)

title%22%3A%22%22%2C%22longitude%22%3A-118.29152006048791%2C%22latitude%22%3A34.02551004278704%2C%22isIncludeShareUrl%22%3Atrue%7D&level=14, accessed April 22, 2022.

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

18 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5547-020-019, -041, -046, and -047 http://zimas.lacity.org/, accessed April 22, 2022.

farmland or forest land, are not zoned for farmland/agricultural use or forest land, and do not contain any agricultural or forest uses.[19] 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?	☒	☐	☐	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☒	☐	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

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 (Air Basin). Within the Air Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [$PM_{2.5}$], and lead[20]). SCAQMD's 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional

[19] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5547-020-019, -041, -046, and -047 http://zimas.lacity.org/, accessed April 22, 2022.

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

issues relating to transportation, the economy, community development and the environment.[21] 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 Air Basin, which is currently in non-attainment of federal air quality standards for ozone, $PM_{2.5}$ and lead, and state air quality standards for ozone, particulate matter less than 10 microns in size (PM_{10}), and $PM_{2.5}$. As a result, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Air 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 *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 also be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

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

Construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.[22] 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.[23]

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?	☐	☐	☐	☒
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐

[22] SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/rules-compliance/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed April 22, 2022.

[23] SCAQMD, Rule 402, Nuisance, adopted May 7, 1976.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

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

No Impact. The Project Site is located in an urbanized area and is currently developed with a two-story shopping center; a single-story commercial nursery; a single-story private school; a single-story private school building; and associated surface parking areas. Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings. Based on the lack of habitat on the Project Site, it is unlikely any special status species listed by the California Department of Fish and Wildlife (CDFW)[24] or by the U.S. Fish and Wildlife Service (USFWS)[25] would be present on-site. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City of Los Angeles.[26] Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW or USFWS. No impact would occur and no further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is located in an urbanized area and is currently developed with a two-story shopping center; a single-story commercial nursery; a single-story private school; a single-story private school building; and associated surface parking areas. No riparian or other sensitive natural community

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24 California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, April 2022.

25 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, accessed April 22, 2022.

26 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.

exists on the Project Site or in the surrounding area.[27,28] 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.[29,30] In addition, there are no other sensitive natural communities identified by the CDFW or the USFWS.[31,32] 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 two-story shopping center; a single-story commercial nursery; a single-story private school; a single-story private school building; and associated surface parking areas. No water bodies or state and federally protected wetlands exist on the Project Site.[33] As such, the Project would not have an adverse effect on state or 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 two-story shopping center; a single-story commercial nursery; a single-story private school; a single-story private school building; and associated surface parking areas. 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

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27 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5547-020-019, -041, -046, and -047 http://zimas.lacity.org/, accessed April 22, 2022.

28 United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed April 22, 2022.

29 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.

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

31 California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), Hollywood Quad Species List, https://apps.wildlife.ca.gov/bios/, accessed April 22, 2022.

32 California Department of Fish and Wildlife, CDFW Lands, https://apps.wildlife.ca.gov/lands/, accessed April 22, 2022.

33 United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed April 22, 2022.

Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.[34,35]

According to the Tree Inventory Report prepared for the Project dated November 3, 2020 and included in Appendix IS-1 of this Initial Study, there are six non-protected trees on the Project Site and 12 non-protected street trees adjacent to the Project Site.[36] The Project would involve removal of all six on-site trees and 10 of the 12 street trees. Although unlikely, these trees could potentially provide nesting sites for migratory birds. However, the Project would comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish and Game Code Section 3503 states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." No exceptions are provided in the code and CDFW has never promulgated any regulations interpreting these provisions.

In accordance and in order to comply with the Migratory Bird Treaty Act and California Fish and Game Code, tree removal activities associated with the Project would take place outside of the nesting season (February 1–August 31), to the extent feasible. Should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and is based on the professional judgement of the monitoring biologist, in coordination with the CDFW.

With compliance with the Migratory Bird Treaty Act, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Impacts would be less than 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 four inches in diameter at breast height or four and one-half 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

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34 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.

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

36 Paul Lewis Landscape Architect, Tree Report for 1534 Highland Ave. Los Angeles, CA 90028, November 3, 2020. See Appendix IS-1 of this IS.

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 dated November 3, 2020, and included in Appendix IS-1 of this Initial Study, existing landscaping within Project Site includes six trees, including one *Phoenix dactylifera*, three *Washingtonia robusta*, and two *Alnus rhombifolia*.[37] None of the six on-site trees are considered to be protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873. In addition, there are 12 street trees within the public rights-of-way surrounding the Project Site that are not species that are protected by the LAMC. These include two *Washingtonia robusta*, four *Magnolia grandiflora*, two *Handroanthus impet*, two *Jacaranda mimosifolia*, one *Olea eurpaea*, and one *Metrosideros excelsa*. The existing on-site trees and 10 of the 12 street trees would be removed as part of the Project. The remaining two trees would be avoided or preserved in place. All street tree removals would be subject to the requirements of the City's Urban Forestry Division and would be subject to the approval of the Board of Public Works. The Project would replace the six on-site trees to be removed at a 1:1 ratio and 10 street trees to be removed with 31 new street trees and eight new palms along the street for a total of 39 new trees, which would exceed the Bureau of Street Services, Urban Forestry Division's requirements to replace street trees on a 2:1 basis. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

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

No Impact. As described above, the Project Site is located in an urbanized area and is currently developed with a two-story shopping center; a single-story commercial nursery; a single-story private school; a single-story private school building; and associated surface parking areas. As discussed above, landscaping within the Project Site is limited to six on-site trees. In addition, there are 12 street trees within the public rights-of-way. The Project Site does not support any designated habitat or natural community. No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.[38] Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No impact would occur, and no further evaluation of this topic in an EIR is required.

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[37] Paul Lewis Landscape Architect, Tree Report for 1534 Highland Ave. Los Angeles, CA 90028, November 3, 2020. See Appendix IS-1 of this IS.

[38] California Department of Fish and Wildlife, California Natural Community Conservation Plans, April 2019.

V. CULTURAL RESOURCES

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

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

Potentially Significant Impact. Section 15064.5 of the CEQA Guidelines generally defines a 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 described, the Project Site is currently developed with a two-story shopping center; a single-story commercial nursery; a single-story private school; a single-story private school building; and associated surface parking areas. While no historical resources are anticipated within the Project Site, the Hollywood High School Historic District is located to the west of the Project Site across North Highland Avenue. In addition, two of the buildings appear to be constructed in the 1950s-1960s and will be evaluated in the Draft EIR. Therefore, further evaluation of the Project's potential impacts on historical resources will be included in the EIR.

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

Potentially Significant Impact. CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within an urbanized area of the City and has been subject to grading, excavation and fill activities, and development in the past. Therefore, surficial archaeological resources that may have existed at one time have likely been previously disturbed. Nevertheless, the Project would result in excavation depths of up to approximately 65 feet below ground surface (bgs) for the six subterranean levels, and a maximum of approximately 87 feet bgs in the approximate lowest proposed bottom of excavation surfaces from the approximate highest current ground surface. Therefore, further evaluation of the Project's potential to disturb previously undiscovered archaeological resources will be included in the EIR.

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

Less Than Significant Impact. The Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. Nevertheless, as the Project would require excavation at depths greater than those that have previously occurred on site, the potential exists to uncover existing but undiscovered human remains. If human remains are discovered during Project construction, work in the immediate vicinity of the construction area would be halted, and the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determines the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the most likely descendent. 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 further evaluation 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?	☒	☐	☐	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☒	☐	☐	☐

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

Potentially Significant Impact. The Project would generate an increased demand for electricity and natural gas services provided by the Los Angeles Department of Water and Power (LADWP) and the Southern California Gas Company, respectively, 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.[39] The 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 2019 Title 24 standards, which became effective on January 1, 2020.[40] The 2019 Title

[39] CPUC, California Renewables Portfolio Standard (RPS) Program, www.cpuc.ca.gov/RPS_Overview/, accessed April 24, 2022.

[40] CEC, 2019 Building Energy Efficiency Standards, www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency, accessed April 24, 2022.

24 standards include efficiency improvements to the residential standards for attics, walls, water heating, and lighting and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1 2013 national standards.[41]

As previously described, the Project Site is currently developed with a two-story shopping center; a single-story commercial nursery; a single-story private school; a single-story private school building; and associated surface parking areas. 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. In addition, as discussed above, the Project would be designed to meet the standards for LEED Certification. 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.	☒	☐	☐	☐
ii. Strong seismic ground shaking?	☒	☐	☐	☐
iii. Seismic-related ground failure, including liquefaction?	☒	☐	☐	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☒	☐	☐	☐

[41] 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?	☒	☐	☐	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐

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

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

Potentially Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (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 11,700 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 (previously 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 are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. 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.

Based on City data, the Project Site is not located within a City-designated Fault Rupture Study Area or an Alquist-Priolo Earthquake Fault Zone as mapped by CGS.[42] The closest fault zone is associated with the Hollywood Fault and is located approximately 0.51 mile north of the Project Site. Notwithstanding, due to the proximity of the nearest fault zone, further evaluation in regard to the potential for fault rupture will be provided in the EIR.

ii. Strong seismic ground?

Potentially 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, the closest fault zone is associated with the Hollywood Fault and is located approximately 0.51 mile north of the Project Site. The Project would increase the amount of development on-site, thereby increasing the number of people on-site exposed to potential adverse effects from ground shaking. Although Project construction must comply with the most current Los Angeles Building Code regulations, which specify structural requirements for different types of buildings in a seismically active area, further evaluation of the potential for strong seismic ground shaking will be provided in the EIR.

iii. Seismic-related ground failure, including liquefaction?

Potentially Significant Impact. Liquefaction potential is greatest where the groundwater level is shallow, and submerged loose, fine sands occur within a depth of about 50 feet or less. Liquefaction potential decreases as grain size and clay and gravel content increase. As ground acceleration and shaking duration increase during an earthquake, liquefaction potential increases. The Project Site is not located within an area identified by the City of Los Angeles, County of Los Angeles, or California Geological Survey as having a potential for liquefaction.[43,44] Notwithstanding, further evaluation regarding the potential for liquefaction will be included in the EIR.

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. Given the largely impervious (developed/paved) nature of the Project Site, large areas of exposed soil or rocks that could slide or become loose are not present. In addition, 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 of Los Angeles.[45,46,47] Therefore, the Project would not directly or

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42 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5547-020-019, -041, -046, and -047 http://zimas.lacity.org/, accessed April 22, 2022.

43 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5547-020-019, -041, -046, and -047 http://zimas.lacity.org/, accessed April 22, 2022.

44 California Geological Survey, Earthquake Zones of Required Investigation, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed April 24, 2022.

45 California Geological Survey, Earthquake Zones of Required Investigation, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed April 24, 2022.

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

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.

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

Less Than Significant Impact. Development of the Project would require grading, excavation, and other construction activities that have the potential to disturb 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 the City of Los Angeles Department of Building and Safety (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. 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?

Potentially Significant Impact. As discussed above, the Project Site is susceptible to ground shaking and thus the potential for lateral spreading may be present. As such, further evaluation of geologic stability will be provided in the EIR.

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?

Potentially 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. The Project Site may contain soils that are considered to have a moderate to high expansive potential. Therefore, further evaluation of expansive soils will be provided in the EIR.

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

(Footnote continued from previous page)

[47] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5547-020-019, -041, -046, and -047 http://zimas.lacity.org/, accessed April 22, 2022.

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. No unique geologic features are located on-site. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Although the Project Site has been previously graded and developed, the Project would require grading of the Project Site and excavations up to a depth of approximately 65 feet bgs for the six subterranean levels, and a maximum of approximately 87 feet bgs in the approximate lowest proposed bottom of excavation surfaces from the approximate highest current ground surface that could have the potential to disturb existing but undiscovered paleontological resources. Therefore, further evaluation of the Project's potential impacts to paleontological resources will be provided in the EIR.

VIII. GREENHOUSE GAS EMISSIONS

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

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

Potentially Significant Impact. Gases that trap heat in the atmosphere are called greenhouse gases (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?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	☐	☐	☒	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

The following analysis is based, in part, on the Phase I Environmental Site Assessment—Multiple Parcels Area Selma Avenue and Sunset Boulevard Hollywood, California (Phase I ESA) dated June 2021 and prepared for the Project by Group Delta. All specific information regarding historic and existing on-site conditions in the discussion below is from this report unless otherwise noted. This report is included as Appendix IS-2 of this Initial Study.

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

Less Than Significant Impact.

Construction

Typical of construction activities for development projects, during demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners would be routinely used on the Project Site. However, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials, including, but not limited to the Resource Conservation and Recovery Act, California Hazardous Waste Control Law, Federal and State Occupational Safety and Health Acts, SCAQMD rules, and permits and associated conditions issued by LADBS. These existing regulations are aimed at the amount of hazardous materials used, accident prevention, protection from exposure to specific chemicals, and the proper storage and disposal of hazardous materials. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. Accordingly, Project construction activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials during construction. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant and no further evaluation of this topic in the EIR is required.

Operation

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in commercial uses, including cleaning products, paints, and those used for maintenance of landscaping. The studio uses, in particular, could involve the use of hazardous materials such as paints, adhesives, aerosol spray paint, as well as other materials for production and set making. Such use would be consistent with that currently occurring at other commercial and studio developments. However, as with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with manufacturer's standards and all applicable federal, state, and local requirements, such as California Hazardous Waste Control Law, Federal and California Occupational Safety and Health Acts, the Emergency Planning and Community Right-to-Know Act (Superfund Amendments and Reauthorization Act, Title III), and Safe Drinking Water and Toxic Enforcement Act, and Uniform Fire Code. Therefore, with compliance with manufacturer's standards and all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the

routine transport, use, or disposal of hazardous materials during operation of the Project would be less than significant, and no further evaluation of this topic in the EIR is required.

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

Less Than Significant Impact with Mitigation Incorporated. The current and past land uses within the Project Site were identified as part of the Phase I ESA to assess their potential to present concerns relative to the presence of hazards within the Project Site. These concerns are classified as Recognized Environmental Conditions (RECs), which are defined in Section 1.1.1 of the American Society for Testing and Materials (ASTM) Standard Practice as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.

As detailed in the Phase I ESA, included in Appendix IS-2 of this Initial Study, the Project Site was developed with residential and commercial uses between approximately 1907 and 1964, after which the site consisted entirely of commercial uses and parking areas. Such commercial uses included retail stores, office buildings, a motel, and a gasoline service station in 1924 and from 1965 to 1989. In addition, adjoining and adjacent properties were historically occupied by commercial, retail, hotel, museum/theater, and residential uses. Some of these adjacent uses included gas stations and dry cleaners.

An analysis of the potential risk of upset conditions involving the release of hazardous materials associated with the historic, existing, and proposed use of the Project Site is provided below.

Underground and Aboveground Storage Tanks and Soil Gas Conditions

According to the Phase I ESA, the Project Site was occupied by a former gas station as well as drycleaner operations in the area of the existing two-story commercial office building. Specifically, a gasoline service station was located at the corner of North Highland Avenue and Sunset Boulevard at 6767 and 6775 Sunset Boulevard from 1965 to 1989. The Project Site was occupied by Gary's Texaco Service Station in 1976 to 1981, Murphy and Goodwin gasoline service station from 1969 to 1973, Aero Rent A Car in 1971, George's Texaco in 1986, and South Service from 1987 to 1988. One 550-gallon waste oil underground storage tank (UST) and two 10,000-gallon gasoline USTs were installed in 1965 and one 6,000-gallon gasoline UST was installed in 1970. The USTs were of single-walled steel construction. The former drycleaner operations that occupied the site included Wise Edward in 1937 at 1510 North Highland Avenue, Gordon Samuel in 1929 at 6769 Sunset Boulevard, and Kent Cleaners at 6767 Sunset Boulevard in 1991. Kent Cleaners was located within the existing two-story commercial office building. The gas station and other drycleaner operations were located at the site of the commercial office building before its construction.

A Soil Vapor Study was performed at the Texaco Service Station at 6767 Sunset Boulevard in 1986, which discovered an unauthorized release of gasoline that impacted soil. A Final Report at the Texaco Service Station at 6767 Sunset Boulevard was performed in 1987, which documented the removal of

four USTs under the supervision of the LAFD: two 10,000-gallon gasoline USTs, one 6,000-gallon gasoline UST, and one 550-gallon waste oil UST. After the tank removal, five soil samples were collected from within the tank pit: four from the base of the gasoline tanks pit, one from the north end of the gasoline tanks pit, two from the gasoline tanks pit spoil, several from the base of the waste oil tank pit, and several from the waste oil pit spoil. The samples from the gasoline tanks pit and spoil as well as the waste oil tank pit and spoil were analyzed for total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), and lead. High levels of TPH (331 milligrams per kilogram [mg/kg]), toluene (30 mg/kg), ethylbenzene (70 mg/kg), total xylenes (550 mg/kg), and lead (50 mg/kg) were detected in soil at the north end of the gasoline tanks pit. VOCs were not detected in the remaining soil samples, TPH was detected at a maximum concentration of 3 mg/kg in soil, and lead was detected at a maximum concentration of 2.5 mg/kg in soil. Additionally, impacted soils were identified in the tank pit spoils and disposed off-site, according to hazardous waste manifests dated April 21 through 23, 1987.

As discussed in the Phase I ESA, approximately 20 cubic yards of impacted soil was excavated and removed from the north end of the gasoline tanks pit, then disposed off-site. The gasoline tanks pit and waste oil tank pit were backfilled with decomposed granite import soil. Three confirmation soil samples were collected after the remedial excavation and analyzed for TPH and VOCs to verify that all contaminated soil had been removed. VOCs were not detected in the confirmation samples, and the maximum concentration of residual TPH detected was 1 mg/kg in one sample. The LAFD issued a Tank Removal Closure for the Former Texaco Service Station at 6767 Sunset Boulevard, dated May 15, 1996. The existing two-story commercial office building was constructed in the area of the former gas station in 1990. The entire footprint of the parcel was excavated to approximately 15 feet below ground surface to accommodate the existing one level of below-grade parking beneath the existing commercial office building. Based on regulatory status and subsequent redevelopment of the Project Site, the former release from the gasoline service station on the Project Site represents a Historical Recognized Environmental Condition (HREC) to the Project Site. Subsequent soil sampling did not detect any soil vapors above regulatory levels. However, in the event that contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, off-site disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166.[48] Therefore, compliance with existing regulations would ensure the Project would not create or exacerbate a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the handling and disposal of contaminated soil that may be encountered on-site.

As also described in the Phase I ESA, according to files provided by the SCAQMD, a permit to operate perchloroethylene (PCE)-containing dry cleaning equipment was issued to Kent Cleaners at 6767 Sunset Boulevard in 1991 in the existing two-story commercial office building. Additionally, several historical dry cleaners were identified in the same location as Kent Cleaners before the existing commercial office building was constructed: Gordon Samuel was listed as a clothes pressers, cleaners, and repairers in 1929 at 6769 Sunset Boulevard and Wise Edward was listed as a clothes pressers, cleaners, and repairers in 1937 at 1510 North Highland Avenue. These operations were located near the former gas

[48] South Coast Air Quality Management District. Rules and Compliance, Rule 1166, www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf?sfvrsn=4, accessed October 25, 2022.

station and within the area of the existing two-story commercial office building. As previously discussed, the entire footprint of the existing commercial office building was excavated to approximately 15 feet below ground surface to accommodate the existing one level of below-grade parking beneath the existing commercial office building. Any potential impacts from Gordon Samuel and Wise Edward were likely removed during redevelopment activities. Additionally, any incidental releases of PCE associated with on-site operations at the former Kent Cleaners in the existing commercial office building were unlikely to impact soils on-site because of the below-grade parking level underlying the former dry-cleaning suite which provided a buffer of space between Kent Cleaners and the soils beneath it. Based on this information, the former dry-cleaning operations (Gordon Samuel in 1929, Wise Edward in 1937, and Kent Cleaners in 1991) do not represent a REC to the Project Site.

Asbestos-Containing Materials

Asbestos is a naturally occurring mineral made up of microscopic fibers. Asbestos has unique qualities that include its strength, fire resistance, resistance to chemical corrosion, poor conduction of heat, noise, and electricity, and low cost. Asbestos was widely used in the building industry starting in the late 1800s and up until the late 1970s for a variety of uses, including acoustic and thermal insulation and fireproofing, and is often found in ceiling and floor tiles, linoleum, pipes, structural beams, and asphalt. Thus, a building, structure, surface asphalt driveway, or parking lot constructed prior to 1979 could contain asbestos or Asbestos Containing Materials (ACMs). Despite its useful qualities, asbestos becomes a hazard if the fibers separate and become airborne. Inhalation of airborne asbestos fibers could cause lung diseases.

As described in the Phase I ESA, based on the age of the existing structures, there is potential for ACM-containing materials to be present at the Project Site. In the event that ACMs are found on-site during construction, suspect materials would be removed in accordance with applicable regulations, under the guidance of a California Occupational Safety and Health Administration (Cal/OSHA)-Certified Asbestos Consultant. In addition, development of the Project would include the use of commercially sold construction materials without asbestos or ACMs. With compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment. Therefore, the Project would not exacerbate environmental hazards related to risk of upset or accident conditions associated with the exposure of ACMs to the public or environment.

Lead-Based Paint

Lead is a naturally occurring element and heavy metal that was widely used as a major ingredient in most interior and exterior oil-based paints prior to 1950. Lead compounds continued to be used as corrosion inhibitors, pigments, and drying agents from the early 1950s to 1972, when the Consumer Products Safety Commission specified limits on lead content in such products. The most common paths of lead exposure in humans and adverse health effects are through ingestion and inhalation.

As described in the Phase I ESA, based on the age of the existing structures, there is potential for lead-based paint (LBP)-containing materials to be present at the Project Site. In the event that LBP is found within areas proposed for demolition or renovation, suspect materials would be removed in accordance with procedural requirements and regulations for the proper removal and disposal of LBP

prior to construction activities, including standard handling and disposal practices pursuant to OSHA regulations, under the guidance of a Cal/OSHA-Certified Lead-Related Construction Inspector/Assessor. Example procedural requirements include the use of respiratory protection devices while handling lead-containing materials, containment of lead or materials containing lead on the Project Site or at locations where construction activities are performed, and certification of all consultants and contractors conducting activities involving LBP or lead hazards. Therefore, the Project would not exacerbate environmental hazards related to risk of upset or accident conditions associated with the exposure of LBP to the public or environment.

Polychlorinated Biphenyls

Typical sources of polychlorinated biphenyls (PCBs) include electrical transformer cooling oils, fluorescent light fixture ballasts, and hydraulic oil. In 1976, the U.S. Environmental Protection Agency (USEPA) banned the manufacture and sale of PCB-containing transformers. Prior to this date, transformers were frequently filled with a dielectric fluid containing PCB-laden oil. Due to their hazardous properties, all aspects of PCBs are strictly regulated by the USEPA under the Toxic Substances Control Act. These regulations ban the manufacture of PCBs although the continued use of existing PCB-containing equipment is allowed. Transformer oil containing PCBs at a concentration exceeding five parts per million is the California-regulated concentration for hazardous waste though PCBs in transformer oil at a concentration up to 50 parts per million are currently allowed in transformers in California. The Toxic Substances Control Act also contains provisions controlling the continued use and disposal of existing PCB-containing equipment. As described in the Phase I ESA, during the site reconnaissance in 2021, an electrical transformer room was observed on-site in the below-grade parking level at 6767 Sunset Boulevard which was inaccessible at the time of the site reconnaissance. However, no leaking or staining in the vicinity of the room was observed. In addition, electric above-ground wheelchair lifts were observed at 1518 North Highland Avenue which appeared to be in good condition. During demolition, suspect materials would be removed in accordance with all applicable federal, state, and local regulations, such as the Toxic Substances Control Act and California Hazardous Waste Control Law. As such, with compliance with applicable regulations and requirements, the Project would not exacerbate the risk of upset and accident conditions associated with PCBs. Therefore, impacts related to the removal of PCBs during demolition would be less than significant.

Oil Wells and Methane

The Phase I ESA included a review of oil field maps published by the State of California Geologic Energy Management Division (CalGEM) and online mapping systems (DOMS 2.0) in order to determine if oil production occurred on or near the Project Site. The CalGEM online mapping systems indicated that there is one core hole within 1,500 feet of the Project Site and it is listed as plugged and abandoned. In addition, based on the City's General Plan Safety Element, the Project Site is not located within an oil field or oil drilling area in the City.[49] Additionally, the Project Site is not located within a designated Methane

[49] Los Angeles General Plan Safety Element, November 1996, Exhibit E, Oil Field & Oil Drilling Areas, p. 55.

Zone or Methane Buffer Zone mapped by the City.[50] Therefore, the Project would not exacerbate environmental hazards relative to oil wells or methane.

Based on the above, the Project would not create a significant hazard to the public or the environment through the exacerbation of reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment and, impacts would be less than significant. No further evaluation of this topic in the EIR is required.

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

Less Than Significant Impact. The nearest school is Hollywood High School located across from the Project Site on North Highland Avenue. As discussed above, the types and amounts of hazardous materials that would be used in connection with construction of the Project would be typical of those used during construction of commercial developments and would include fuels, paints, solvents, and concrete additives. Similarly, the types and amounts of hazardous materials used during operation of the proposed uses would be typical of such developments and would include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations including, but not limited to, federal and state OSHA requirements, and would not create a significant hazard to nearby schools. As such, the Project's potential impacts associated with hazards within a one-quarter mile of an existing school would be less than significant, and no further evaluation of this topic in the EIR is required.

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

Less Than Significant Impact. Section 65962.5 of the California Government Code requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While Section 65962.5 refers to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of multiple agencies including the Department of Toxic Substances Control (DTSC), the State Water Resources Control Board (SWRCB), and CalEPA.

As part of the Phase I ESA, agency database lists were reviewed for known or suspected contaminated sites and for sites that store, generate, or use hazardous materials near the subject property. The Phase I ESA reports that the search revealed that the Project Site is listed on the standard environmental government sources, including the EDR DRYCLEANERS, EDR Hist Cleaner, EDR Hist Auto, USEPA Facility Index System/Facility Registry System (FINDS), USEPA Enforcement and Compliance History Online (ECHO), Underground Storage Tank (UST), Historical Underground Storage Tank (HIST UST),

[50] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5547-020-019, -041, -046, and -047 http://zimas.lacity.org/, accessed April 22, 2022.

Hazardous Waste Tracking System (HWTS), Los Angeles Fire Department Hazardous Materials Division (LAFD HMD), Resource Conservation and Recovery Act—Small Quantities Generators (RCRA-SQG), Statewide Environmental Evaluation and Planning System—Underground Storage Tank (SWEEPS UST), California Facility Inventory Database—Underground Storage Tank (CA FID UST), and HAZNET databases. While the Project Site appears on these lists, the Project Site is not listed as a contaminated site. In addition, as part of the Phase I ESA, DTSC Envirostor and State Water Resources Control Board (SWRCB) Geotracker online databases were reviewed. The Project Site was not identified on the Envirostor or Geotracker databases.

According to records provided by LAFD UST, LADBS, and SCAQMD and as previously discussed above, the Project Site was occupied by a gasoline service station at the corner of North Highland Avenue and Sunset Boulevard at 6767 and 6775 Sunset Boulevard from 1965 to 1989. As described above, the Project Site was occupied by Gary's Texaco Service Station in 1976 to 1981, Murphy and Goodwin gasoline service station from 1969 to 1973, Aero Rent A Car in 1971, George's Texaco in 1986, and South Service from 1987 to 1988. One 550-gallon waste oil UST and two 10,000-gallon gasoline USTs were installed in 1965 and one 6,000-gallon gasoline UST was installed in 1970, all of which were later removed in 1987 after an unauthorized release of gasoline that impacted soil was discovered. Approximately 20 cubic yards of impacted soil was excavated and removed from the north end of the gasoline tanks pit and the impacted soil was disposed off-site. Three confirmation soil samples were collected after the remedial excavation to verify that all contaminated soil had been removed. VOCs were not detected in the confirmation samples, and the maximum concentration of residual TPH detected was 1 mg/kg in one sample. The LAFD issued a Tank Removal Closure for the Former Texaco Service Station at 6767 Sunset Boulevard, dated May 15, 1996. As previously discussed, the existing two-story commercial office building was constructed in the area of the former gas station in 1990, during which the entire footprint of the parcel was excavated to approximately 15 feet below ground surface to accommodate the existing one level of below-grade parking beneath the existing commercial office building. Based on regulatory status and subsequent redevelopment of the Project Site, the former release from the gasoline service station on-site represents a HREC to the Project Site.

In addition, as previously discussed, according to files provided by the SCAQMD, a permit to operate PCE-containing dry cleaning equipment was issued to Kent Cleaners at 6767 Sunset Boulevard in 1991 in the existing two-story commercial office building. Several historical dry cleaners were identified in the same location as Kent Cleaners before the existing two-story commercial office building was constructed: Gordon Samuel was listed as a clothes pressers, cleaners, and repairers in 1929 at 6769 Sunset Boulevard and Wise Edward was listed as a clothes pressers, cleaners, and repairers in 1937 at 1510 North Highland Avenue. These operations were located near the former gas station and within the area of the existing two-story commercial office building. As previously discussed, the entire footprint of the existing commercial office building was excavated to approximately 15 feet below ground surface to accommodate the existing one level of below-grade parking beneath the existing commercial office building. Any potential impacts from Gordon Samuel and Wise Edward were likely removed during redevelopment activities. Additionally, any incidental releases of PCE associated with on-site operations at the former Kent Cleaners in the existing commercial office building were unlikely to impact soils on-site because of the below-grade parking level underlying the former dry-cleaning suite which provided a buffer of space between Kent Cleaners and the soils beneath it. Based on this information, the former dry-cleaning operations (Gordon Samuel in 1929, Wise Edward in 1937, and Kent Cleaners in 1991) do not represent a REC to the Project Site.

Beyond the Project Site, the nearest listed environmental concern sites are located adjacent to the south at 6738 Sunset Boulevard, 6730 Sunset Boulevard, 6748 Sunset Boulevard, 6786 Sunset Boulevard as well as adjacent to the east at 6725 Sunset Boulevard and adjacent to the west at 1521 North Highland Avenue. The adjacent property to the south at 6738 Sunset Boulevard is listed on the EDR Hist Cleaner database. According to the listing, Tissenbaum O B clothes pressers and cleaners occupied the property in 1933, and Lautaret Paul clothes pressers and cleaners occupied the property in 1937. Based on time elapsed since use as a dry cleaners and subsequent redevelopment of the property as a parking lot, these listings do not represent a REC to the Project Site.

The adjacent property to the south at 6730 Sunset Boulevard is listed on the UST database. The UST status is listed as "historical" and no further information is provided. Based on the lack of evidence of a release and the current use of the property as an office building, this listing does not represent a REC to the Project Site.

The adjacent property to the south at 6748 Sunset Boulevard is listed on the EDR Hist Cleaner database. According to the listing, Hollywood America Cleaners was a clothes pressers, cleaners, and repairers that occupied the property in 1929. Based on time elapsed since use as a dry cleaners and subsequent redevelopment of the property as a parking lot, these listings do not represent a REC to the Project Site.

The adjacent property to the south--the former site of the Sunset Union Service Station #6338, with no associated address--is listed on multiple regulatory databases. According to the listings, Sunset Union Service gasoline service station occupied the property from 1987 to 1992. An unauthorized release of gasoline was reported on March 4, 1993. The case was issued closure under California State Water Resources Control Board (SWRCB) oversight as of January 1, 2010. Based on regulatory status, this former release does not represent a REC to the Project Site.

The adjacent property to the south at 6786 Sunset Boulevard is listed on the EDR Hist Cleaner database. According to the listing, Auga Emile hand laundries occupied the property in 1937. Based on time elapsed since use as a dry cleaners and subsequent redevelopment of the property as a restaurant, this listing does not represent a REC to the Project Site.

The adjacent property to the east at 6725 Sunset Boulevard is listed on several regulatory databases. According to the listings, this facility was classified as a hazardous waste handler from 1993 to 2000 and in 2019. Based on the lack of evidence of violations, spills, or a documented release, these listings do not represent a REC to the Project Site.

Lastly, the adjacent property to the west at 1521 North Highland Avenue is listed on multiple regulatory databases. The facility was classified as a small-quantity hazardous waste generator in 1987 and as a large-quantity hazardous waste generator in 2003 and 2004. The type of hazardous waste generated includes lead. Based on the lack of evidence of a release and the current use of the property as a school, these listings do not represent a REC to the Project Site.

Based on the above, the Project would not be located on a contaminated site and would not create or exacerbate a significant hazard to the public or the environment. As such, the Project's potential impacts would be less than significant, and no further evaluation of this topic in the EIR is required.

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

Less Than Significant Impact. The Project Site is not located within 2 miles of an airport or within an airport planning area. The closest airport is the Bob Hope Airport, which is approximately 7 miles north of the Project Site. Given the distance between the Project Site and this airport, the Project would not have the potential to result in a safety hazard or excessive noise for people residing or working near an airport. Therefore, no impact would occur, and no further evaluation of this topic in the EIR is required.

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

Less Than Significant Impact. According to the Safety Element, the nearest disaster route in the vicinity of the Project Site is Santa Monica Boulevard, which is located approximately 0.5-mile south of the Project Site.[51] While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would remain open in accordance with standard construction management plans that are required to be prepared and would be implemented to ensure adequate circulation and emergency access. In addition, while operation of the Project would generate traffic in the Project Site vicinity and would result in some modifications to the Project Site's access, as discussed under Checklist Question No. XV.a of this Initial Study, the Project would comply with LAFD access requirements and would not impede emergency access in the Project Site vicinity. Therefore, the Project would not physically interfere with or impair the implementation of the City's designated disaster routes or the City's emergency response plan. The Project's potential impacts would be less than significant, and no further evaluation of this topic in the EIR is required.

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

No 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, nor is it located within a City-designated fire buffer zone.[52,53] 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

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51 Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.

52 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5547-020-019, -041, -046, and -047 http://zimas.lacity.org/, accessed April 22, 2022. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

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

57.507.3.1 establishes fire water flow standards. In addition, the Project's proposed commercial 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, no impact would occur, and no further evaluation of this topic in the EIR is required.

X. HYDROLOGY AND WATER QUALITY

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

The following analysis is based, in part, on the Water Resources Technical Report (Water Resources Report) prepared for the Project by KPFF, dated June 2022 and included as Appendix IS-3 of this Initial Study.

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

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

Surface Water Quality

Construction

During Project construction, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. However, as Project construction would disturb more than 1 acre of soil, the Project would be required to implement a Storm Water Pollution Prevention Plan (SWPPP) under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. In accordance with the requirements of the NPDES Construction General Permit, the Project would prepare and implement a site-specific SWPPP adhering to the California Stormwater Quality Association Best Management Practices (BMP) Handbook. The SWPPP would set forth BMPs for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction. The SWPPP would be carried out in compliance with the requirements of the SWRCB and the Regional Water Quality Control Board, Los Angeles Region (LARWQCB). In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), which include standard erosion control measures and mandate the preparation and implementation of an erosion control plan to reduce the effects of sedimentation and erosion in compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities and Part B, Planning Activities. For construction during the rainy season (October 1st to April 14th), the City's grading permit regulations require the implementation of a wet weather erosion control plan that would be prepared pursuant to the "Manual and Guideline for Temporary and Emergency Erosion Control," adopted by the Los Angeles Board of Public Works and incorporated into the City's Development Best Management Practices Handbook, Part A, Construction Activities. Such requirements would be incorporated into the Project construction SWPPP. Controls for non-stormwater runoff would also be incorporated into the Project's SWPPP.

Furthermore, as discussed in the Water Resources Report, the historical groundwater in the vicinity of the Project Site is 50 feet below ground surface, and construction activities for the Project would include excavations approximately 65 feet bgs for the six subterranean levels up to a maximum of approximately 87 feet bgs in the approximate lowest proposed bottom of excavation surfaces from the approximate highest current ground surface. Based on the historically highest groundwater level and depth of proposed excavation, Project construction activities may encounter groundwater and temporary dewatering may be required. In the event groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable NPDES requirements, including a Dewatering Permit. Possible dewatering systems to be used as listed in the California Stormwater Quality

Association (CASQA) BMP Handbook include dewatering tanks, sand media particulate filters, pressurized bag filters, and cartridge filters.

With the implementation of regulatory compliance requirements including site-specific BMPs included as part of the SWPPP required to comply with NPDES program requirements under federal and state law and City grading permit regulations, the Project would reduce or eliminate the discharge of potential pollutants from stormwater runoff during construction. Therefore, with compliance with NPDES requirements and City grading regulations, construction of the Project would not result in discharge that would violate any water quality standard or waste discharge requirements or otherwise substantially degrade surface water quality. Thus, temporary construction-related impacts on surface water quality would be less than significant, and no further evaluation of this topic in the EIR is required.

Operation

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 and the specific pollutant(s) in the region referred to as the 303(d) list. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL). As discussed in the Water Resources Report, the Project Site is located within and drains into the Ballona Creek Watershed. The Watershed encompasses an area of approximately 130 square miles extending from the Santa Monica Mountains and the Ventura-Los Angeles County line on the north, to the Harbor Freeway (110) on the east, and to the Baldwin Hills on the south. Ballona Creek is a 9-mile-long flood protection channel that drains the Watershed to the Pacific Ocean. The major tributaries to Ballona Creek include Centinela Creek, Sepulveda Canyon Channel, Benedict Canyon Channel, and numerous storm drains. Constituents of concern listed for Ballona Creek under California's Clean Water Act Section 303(d) List include cadmium (sediment), chlordane (tissue & sediment), coliform bacteria, copper (dissolved), cyanide, dichlorodiphenyltrichloroethane (DDT), lead, polycyclic aromatic hydrocarbons (PAHs), PCBs, selenium, sediment toxicity, Shellfish Harvesting Advisory, silver, toxicity, trash, viruses (Enteric), and zinc. Project operations are not anticipated to increase concentrations of these constituents of concern for the Ballona Creek Watershed but would introduce sources of potential water pollution that are typical of urban development (e.g., sediment, nutrients, pesticides, metals, pathogens, and oil and grease).

Stormwater runoff from precipitation events could also potentially carry urban pollutants into municipal storm drains. As discussed in the Water Resources Report, in general, urban stormwater runoff occurs following precipitation events, with the volume of runoff flowing into the drainage system depending on the intensity and duration of the rain event. Contaminants that may be found in stormwater from developed areas include sediments, trash, bacteria, metals, nutrients, organics, and pesticides. The source of contaminants includes surface areas where precipitation falls, as well as the air through which it falls. Contaminants on surfaces such as roads, maintenance areas, parking lots, and buildings, which are usually contained in dry weather conditions, may be carried by rainfall runoff into drainage systems. The City of Los Angeles typically installs catch basins with screens to capture debris before entering the storm drain system. In addition, the City conducts routine street cleaning operations, as well as periodic cleaning and maintenance of catch basins, to reduce stormwater pollution within the City. Under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on site for the volume of water produced by the greater of a 85th percentile storm event or the first 0.75-inch of stormwater

runoff from a storm event (i.e., “first flush”). As discussed in the Water Resources Report, infiltration is proposed as a BMP for the Project Site to address these pollutants.

Under existing conditions, the Project Site consists of four drainage areas. The drainage area is determined by the drainage patterns and flow paths of stormwater that are tributary to a common point or area. For the purposes of the pre-development analysis, the existing site was analyzed across four different tributary areas: Area A1, which is the northeastern portion of the existing site; Area A2, which is an existing alley along McCadden Place; Area A3, which is the southeastern portion of the existing site; and Area B which is the western portion of the site. Drainage from Area A1, A2, and A3 are directed via sheet flow into an existing side opening catch basin at the western corner of McCadden Place and Sunset Boulevard. Drainage from Area B is directed both via curb face discharge along Highland Avenue, as well as sheet flow across an existing parking lot to the south. Both drainage paths direct runoff to an existing side opening catch basin on the eastern corner of Highland Avenue and Sunset Boulevard. These catch basins drain into an 18-inch storm main in Sunset Boulevard and a 57-inch storm main in McCadden Place through 12-inch laterals. In the existing condition, storm water discharges from the Project Site without filtration. The percent impervious varies among each area, as each area contains a different type of development. Area A1 was calculated to be 96.9 percent impervious as it is an existing asphalt parking lot with landscape planters. Area A2 was assumed to be 100 percent impervious as it is an existing paved concrete alley. Area A3 was assumed to be 60 percent impervious as it is an existing plant nursery located on top of paved concrete. Area B was calculated to be 99.6 percent impervious as it consists of developed buildings, a parking lot, and landscaped area. Overall, the existing Project Site contains approximately 91.391.3 percent impervious surface coverage.

Per the LID requirements, as determined by the City of Los Angeles Department of Public Works, Bureau of Sanitation, the Project would include one or more of the following BMPs to treat a “first flush” volume of runoff equal to the greater of an 85th Percentile 24-hour or 0.75-inch rainfall event (in priority order to the maximum extent feasible):

- Infiltration basins or trenches;
- Rainwater harvesting cisterns for irrigation reuse;
- Biofiltration via planter boxes, basins, or proprietary treatment devices.[54]

The following LID BMPs are also proposed to further manage stormwater runoff during operation:

- Provide storm drain system stenciling and signage to discourage illegal dumping;
- Design material storage areas and loading docks within structures or enclosures to prevent leaks or spills of pollutants from entering the storm drain system and;
- Provide evidence of ongoing BMP maintenance as part of a legal agreement with the City of Los Angeles.

[54] LID Manual, p. 21.

Infiltration BMPs must be designed to retain the design storm standard, and must be located at suitable distances from buildings, slopes, property lines, and seasonal high groundwater levels. Infiltration BMPs must also be located in suitable soils with high permeability rates that are not subject to hazards such as liquefaction or expansion. As discussed in the Water Resources Report, infiltration is proposed for the Project Site but may ultimately not be considered feasible. Site specific percolation testing will be further performed during the design phase of the Project to definitively determine the feasibility of infiltration. Should infiltration not be feasible for the Project Site, other BMP measures would be implemented in accordance with LID requirements.

As described in the Water Resources Report, the Project Site's percentage of impervious area will slightly decrease compared to the existing conditions at the Project Site. Specifically, it is assumed that the Project Site would be approximately 90 percent impervious as a conservative assumption (compared to 91.3 under existing conditions) and consist of three drainage areas that would drain via surface flow to the proposed BMPs. Proposed Drainage Area A1 represents the northeastern portion of the Project Site, Proposed Drainage Area A2 represents the southeastern portion of the Project Site, and Proposed Drainage Area B represents the western portion of the Project Site. To meet the LID requirements, it is estimated that up to 5,725 cubic feet of stormwater would need to be treated within the Project Site. In accordance with the LID Ordinance, the analysis required at final engineering during the final design process during building permit plan check with the City of Los Angeles Department of Public Works and the Los Angeles Department of Building and Safety will determine the ultimate BMPs that are needed at the Project Site to meet the LID Ordinance standard. Therefore, with the implementation of the proposed LID BMPs in compliance with the City's LID Ordinance and LID Manual, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. Impacts to surface water quality during operation of the Project would be less than significant, and no further evaluation of this topic in the EIR is required.

Groundwater Quality

Construction

As discussed in the Water Resources Report, the historical groundwater in the vicinity of the Project Site is 50 feet below ground surface, and construction activities for the Project would include excavations approximately 65 feet bgs for the six subterranean levels up to a maximum of approximately 87 feet bgs in the approximate lowest proposed bottom of excavation surfaces from the approximate highest current ground surface. Based on the historically highest groundwater level and depth of proposed excavation, Project construction activities may encounter groundwater. As discussed in the Water Resources Report, the nearest active groundwater well is located approximately 1.71 miles southwest of the Project Site. Due to this distance from the Project Site, construction activities would not be anticipated to affect this existing well. No other groundwater production wells or supply wells exist within 1 mile of the Project Site.

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 disposal. Compliance with all applicable manufacturers' instruction and federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste, which would be addressed in the Project's construction SWPPP, would reduce the potential for the construction of the Project to release contaminants that could percolate into groundwater. In addition, as discussed above, there are no USTs

within the Project Site that could impact groundwater quality during removal. Furthermore, should impacted soils be encountered upon site redevelopment, impacted soils would be characterized, handled, and disposed according to applicable federal, state, and local regulations.

Based on the above, construction of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirement associated with groundwater protection. Therefore, construction-related impacts on groundwater quality would be less than significant, and no further evaluation of this topic in the EIR is required.

Operation

The most prominent type of operational activities from a development project that affect groundwater quality are typically spills of hazardous materials and leaking storage facilities and tanks, including USTs. Surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner in accordance with applicable regulatory requirements, thereby resulting in little threat to groundwater. Other types of risks such as leaking underground storage tanks have a greater potential to affect groundwater. As discussed above in Checklist Question No. IX, Hazards and Hazardous Materials, and in the Phase I ESA, the presence of petroleum impacted soil associated with the historical USTs removed from the site and the remedial excavation areas all received written regulatory closure from the applicable governmental agencies, and no further action or investigation is recommended regarding the HREC. Furthermore, as stated in Checklist Question No. IX.b of this Initial Study, should impacted soils be encountered upon site redevelopment, impacted soils would be characterized, handled, and disposed according to applicable federal, state, and local regulations and a Soil Management Plan reviewed and approved by the City Department of Building and Safety. In addition, the Project would not include any new USTs that would have the potential to expose groundwater to contaminants.

While the development of new building facilities would increase the use of on-site hazardous materials as described above (i.e., cleaning products, those used for maintenance of landscaping, paints, adhesives, aerosol spray paint, as well as other materials for production and set making), as detailed in Checklist Question No. IX.a, compliance with all applicable existing regulations at the Project Site regarding the handling and potentially required cleanup of hazardous materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. The Project also does not include the installation or operation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well, or spreading ground facility. Furthermore, 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.

Therefore, Project operations would not violate any water quality standards or waste discharge requirements with respect to groundwater or otherwise substantially degrade ground water quality. The Project's potential impact on groundwater quality during operation would be less than significant, and no further evaluation of this topic in the 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

Groundwater use for domestic water supply is a major beneficial use of groundwater basins in Los Angeles County. The City of Los Angeles overlies the Los Angeles Coastal Plain Groundwater Basin (Coastal Groundwater Basin). The Coastal Groundwater Basin comprises the Hollywood, Santa Monica, Central, and West Coast Subbasins. Groundwater flow in the Coastal Groundwater Basin is generally south-southwesterly and may be restricted by natural geological features. Replenishment of groundwater basins occurs mainly by percolation of precipitation throughout the region via permeable surfaces, spreading grounds, and groundwater migration from adjacent basins, as well as injection wells designed to pump freshwater along specific seawater barriers to prevent the intrusion of salt water.

As described above, the nearest active groundwater well is located approximately 1.71 miles southwest of the Project Site. No other groundwater production wells or supply wells exist within 1 mile of the Project Site. As described in Section 3, Project Description, of this Initial Study, the Project would involve excavations approximately 65 feet bgs for the six levels of basement, and a maximum of approximately 87 feet bgs in the approximate lowest proposed bottom of excavation surfaces from the approximate highest current ground surface. As provided in the Water Resources Report included in Appendix IS-3 of this Initial Study, historical groundwater levels are approximately 50 feet below ground surface. Therefore, dewatering may be required during construction activities for the Project. If dewatering is required, the Project would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations under the Dewatering Permit. Furthermore, the Project would utilize a hydrostatic design which would withstand hydrostatic forces and incorporate comprehensive waterproofing systems in accordance with current industry standards and construction methods. As such, permanent dewatering operations are not expected, and the groundwater level is expected to return to the existing level at the Project after construction is complete. Since operation of dewatering systems would only be temporary, as previously discussed, local groundwater hydrologic conditions, including groundwater production wells or public water supply wells within 1 mile of the Project Site, would not be affected by any unanticipated Project dewatering operations, and regional impacts to groundwater supplies and management of the basin would not be considered 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 previously discussed, the Project Site's impervious area would slightly decrease from approximately 91.3 percent to approximately 90 percent as a conservative assumption, upon buildout of the Project. As such, the potential for groundwater recharge during Project operations would remain minimal.

Furthermore, the Project's BMPs would control stormwater runoff with no increase in runoff resulting from the Project. The installed BMP systems would be designed with an internal bypass or overflow system to prevent upstream flooding due to large storm events. The 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, which would affect groundwater hydrology, including the direction of groundwater flow. Additionally, as previously discussed, the Project would utilize a hydrostatic design which would withstand hydrostatic forces and incorporate comprehensive waterproofing systems in accordance with current industry standards and construction methods. As such, permanent dewatering operations are not expected, and the groundwater level is expected to return to the existing level at the Project Site after construction is complete. Also, the Project would not include the installation of water supply wells. The Project would not impact the existing groundwater well located approximately 1.71 miles southwest of the Project Site. Therefore, Project operations would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant, and no 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 demolition of the existing buildings and surface parking areas, followed by grading and excavation for the subterranean parking. The building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Throughout the Project Site, the elevation difference is 11 feet with an overall gradient of approximately 2 percent, and it is anticipated that 367,000 net cubic yards of soil would be excavated and exported as part of the Project. 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, construction activities such as earth moving, maintenance/operation of construction equipment, and handling/storage/disposal of materials could contribute to pollutant loading in stormwater runoff. On-site watering activities to reduce airborne dust could also contribute to pollutant loading in runoff. However, as discussed above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows 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 to be incorporated into the Project SWPPP. Thus, through compliance with all NPDES General Construction Permit requirements and a SWPPP that includes implementation of BMPs required by the NPDES program as well as compliance with applicable City grading permit regulations, construction

activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. As such, construction-related impacts to 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 Site's impervious area would slightly decrease from approximately 91.3 percent to approximately 90 percent as a conservative assumption, upon buildout of the Project. The proposed development would also alter the on-site drainage pattern. Generally, the Project Site is relatively flat and slopes downward from north to south. The existing site was divided into four areas for the purposes of hydrology analysis and multiple flow paths were assessed to calculate the total volumetric flow rate. Each area has its own flow path and slope. Area A1 has a volumetric flow rate of 1.00 cubic feet per second (cfs), while the volumetric flow rates of Areas A2, A3, and B are 0.06 cfs, 1.21 cfs, and 3.51 cfs, respectively, for a total of 5.78 cfs. Upon buildout, the Project Site would consist of three drainage areas that would drain via surface flow to the proposed BMPs. Proposed Drainage Area A1 represents the northeastern portion of the Project Site, Proposed Drainage Area A2 represents the southeastern portion of the Project Site, and Proposed Drainage Area B represents the western portion of the Project Site. Each of these areas would be approximately 90 percent impervious as a conservative assumption. Areas A1, A2, and B would have a volumetric flow rate of 1.00, 1.28 and 3.25 cfs, respectively, for a total of 5.53 cfs resulting in an overall decrease in the volumetric flow rate for the Project Site upon buildout of the Project.

As part of the LID plan for the Project to manage post-construction stormwater runoff, the Project would likely install building roof drain downspouts, catch basins, and planter drains throughout the Project Site, which would collect roof and site runoff and direct stormwater away from buildings through a series of building storm drain pipes that would drain to the existing stormwater drainage system off-site. This on-site stormwater conveyance system would serve to prevent on-site flooding of the Project Site. Accordingly, similar to existing conditions, there would be a limited potential for erosion or siltation to occur from exposed soils or large expanses of pervious areas. In addition, as described above, the Project proposes to include infiltration BMPs that would address drainage flows and would ensure that soil erosion does not occur. Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion or siltation on-site or off-site would occur because the volumetric flow rate for the Project Site would decrease upon buildout of the Project compared to existing conditions. Operational impacts 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 of the Project would involve demolition of the existing buildings and surface parking areas, followed by grading and excavation for the subterranean parking. These activities have the potential to

temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable and thus reducing runoff as compared to impermeable surfaces. As noted above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. These BMPs and erosion control measures would contain and treat, as necessary, stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. Thus, through compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in increased runoff or flooding on- or off-site. As such, construction-related impacts associated with flooding from surface runoff would be less than significant, and no further evaluation of this topic in the EIR is required.

Operation

As previously discussed, the Project Site's percentage of impervious area would slightly decrease from approximately 91.3 percent to approximately 90 percent as a conservative assumption, upon buildout of the Project. As detailed in the Water Resources Report, a comparison of the pre- and post-Project peak flow rates indicates a decrease in stormwater runoff from the Project Site from 5.78 cfs under existing conditions to 5.53 cfs with completion of the Project. Under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on site for the volume of water produced by the 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 proposes to include infiltration as established by the LID Manual. As part of the LID plan for the Project to manage post-construction stormwater runoff, the Project would likely install building roof drain downspouts, catch basins, and planter drains throughout the Project Site, which would collect roof and site runoff and direct stormwater away from buildings through a series of building storm drain pipes that would drain to the existing stormwater drainage system off-site. This on-site stormwater conveyance system would serve to prevent on-site flooding of the Project Site. Therefore, the Project would not result in or otherwise increase the potential for 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 the 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 Report, a comparison of the pre- and post-Project peak flow rates indicates a decrease in stormwater runoff from the Project Site from 5.78 cfs under existing conditions to 5.53 cfs with implementation of the Project. Specifically, the Project proposes to implement BMPs that would infiltrate and treat the required LID volumes and would treat all stormwater. Consequently, the Project would reduce the amount of stormwater runoff discharging into the existing storm drainage infrastructure compared to existing conditions. In addition, 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. As part of the LID plan for the Project to manage post-construction stormwater runoff, the Project would install building roof drain downspouts, catch basins, and planter drains throughout the Project Site, which would collect roof and site runoff and direct stormwater away from buildings through a series of building storm drain pipes that would drain to the existing stormwater

drainage system off-site. This on-site stormwater conveyance system would serve to prevent on-site flooding of 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 development of the Project would result in a slightly reduced volumetric flow rate when compared to existing conditions as a result of the implementation of BMPs under the LID Ordinance, and would drain to the existing off-site stormwater conveyance systems. As part of the LID plan for the Project to manage post-construction stormwater runoff, the Project would install building roof drain downspouts, catch basins, and planter drains throughout the Project Site, which would collect roof and site runoff and direct stormwater away from buildings through a series of building storm drain pipes that would drain to the existing stormwater drainage system off-site. This on-site stormwater conveyance system would serve to prevent on-site flooding of the Project Site. As such, the Project would not substantially impede, alter or redirect flood flows. Furthermore, 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.[55,56] As discussed in the Water Resources Report, the Project Site is also not located in a Moderate Flood Hazard Area (500-year floodplain) identified by the Federal Emergency Management Agency (FEMA) and published in the Flood Insurance Rate Maps (FIRM). The areas of minimal flood hazard, which are the areas outside the Special Flood Hazard Area (SFHA) and higher than the elevation of the 500-year floodplain is labeled Zone C or Zone X (unshaded). As shown on Figure 8 of the Water Resources Report, the Project Site is located within Zone X (unshaded) and is therefore located outside of the 100- and 500-year floodplain.

In addition, as discussed above, 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. Thus, the Project would not substantially alter the existing drainage pattern of the site or area in a manner which would impede or redirect flood flows. No impacts would occur, and no further evaluation 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 Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a tsunami hazard area.[57] Therefore, no tsunami or tsunami events would be expected to impact the Project Site and cause any discharge of pollutants. Additionally, there are no standing bodies of water near the Project Site that may

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55 Federal Emergency Management Agency, Flood Insurance Rate Maps, Panel Numbers 06037C1605G, effective September 26, 2008.

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

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

experience a seiche, and therefore there is no significant risk that flows from a seiche could result in the discharge of any pollutants from the Project Site caused by the Project.

Earthquake-induced flooding can result from the failure of dams or other water-retaining structures resulting from earthquakes. According to the General Plan's Safety Element, the Project Site is not located within a flood impact zone.[58] However, the Project Site is mapped within an inundation area for the Hollywood Reservoir, which is held by the Mulholland Dam.[59] The Mulholland Dam is a LADWP dam located in the Hollywood Hills. The Mulholland Dam was built in 1924 and designed to hold 2.5 billion gallons of water. Dam safety regulations are the primary means of reducing damage or injury due to inundation occurring from dam failure. The California Division of Safety of Dams regulates the siting, design, construction, and periodic review of all dams in the State. In addition, LADWP operates the dams and mitigates the potential for overflow and seiche hazard through control of water levels and dam wall height. These measures include seismic retrofits and other related dam improvements completed under the requirements of the 1972 State Dam Safety Act. In addition, the City's Local Hazard Mitigation Plan, which was adopted in July 2011, provides a list of existing programs, proposed activities and specific projects that may assist the City of Los Angeles in reducing risk and preventing loss of life and property damage from natural and human-caused hazards, including dam failure. The Hazard Mitigation Plan evaluation of dam failure vulnerability classifies dam failure as a moderate risk rating.

Considering the above information and risk reduction projects, the risk of flooding from a tsunami, inundation by a seiche or dam failure is considered low. Impacts would be less than significant, and 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. As previously discussed, the Project Site is located within and drains into the Ballona Creek Watershed. Constituents of concern listed for Ballona Creek under California's Clean Water Act Section 303(d) List include cadmium (sediment), chlordane (tissue & sediment), coliform bacteria, copper (dissolved), cyanide, DDT, lead, PAHs, PCBs, selenium, sediment toxicity, Shellfish Harvesting Advisory, silver, toxicity, trash, viruses (Enteric), and zinc. Project operations are not anticipated to increase concentrations of these constituents of concern for the Ballona Creek Watershed but would introduce sources of potential water pollution that are typical of urban development (e.g., sediment, nutrients, pesticides, metals, pathogens, and oil and grease). As discussed above, the Project would be required to implement a SWPPP under the NPDES Construction General Permit that would set forth BMPs for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction.

As previously discussed, the types and amounts of hazardous materials that would be used in connection with construction of the Project would be typical of those used during construction of commercial developments and would include fuels, paints, solvents, and concrete additives. Similarly, the types and

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

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

amounts of hazardous materials used during operation of the proposed uses would be typical of such developments and would include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Specifically, infiltration is proposed for the Project in order to filter, treat, and reduce stormwater pollutants in accordance with the City's LID requirements and SWPPP. As such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans for the Ballona Creek Watershed.

Furthermore, as previously discussed, the Project Site is currently approximately 91.3 percent impervious surfaces and groundwater infiltration is limited. With implementation of the Project, the amount of impervious area would decrease to approximately 90 percent as a conservative assumption. As such, the potential for groundwater recharge during Project operations would remain minimal. The Project would not include the installation of water supply wells or impact the existing groundwater well located approximately 1.71 miles southwest of the Project Site. In addition, the Project Site overlies the Los Angeles Coastal Plain Groundwater Basin, which is managed pursuant to a stipulated judgment in a groundwater adjudication by the basin watermaster and is therefore not subject to the Sustainable Groundwater Management Act or a sustainable groundwater management plan.

With compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

XI. LAND USE AND PLANNING

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

a. Would the project physically divide an established community?

Less than Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is located within the Hollywood Community Plan area and is currently developed with a two-story shopping center; a single-story commercial nursery; a single-story private school; a single-story private school building; and associated surface parking areas. The area surrounding the Project Site is highly urbanized and includes a mix of low- to mid-rise buildings containing a variety of uses, including institutional, office, commercial, and residential. Land uses immediately surrounding the Project Site include commercial uses to the north; a restaurant and vacant building to the south; Hollywood High

School to the west; and restaurant, residential, and office uses to the east. Specifically, a 2-story apartment building and a five-story apartment building are also located directly east of the Project Site, along McCadden Place. Properties to the north, east, and south of the Project Site are zoned C4-2D and C4-2D-SN, while the site of the Hollywood High School is zoned PF-1XL.

As previously discussed, the Project includes the development of a new 503,520-square-foot building comprised of 443,170 square feet of creative office space; 5,330 square feet of retail/restaurant space; and 55,020 square feet of commercial space anticipated to be occupied by recording and production studio and ancillary uses, including an auditorium and live performance venue. The proposed uses would be allocated throughout the new building, which would consist of two interconnected towers—a 12-story tower and a 14-story tower constructed with four shared floors. These uses would be consistent with other developments located adjacent to and in the general vicinity of the Project Site. Additionally, all proposed development would occur within the boundaries of the Project Site and would not include the closure of any surrounding travel routes. Furthermore, the Project does not propose a freeway or other large infrastructure that could divide the existing surrounding community. Access to all surrounding properties would continue to be available upon buildout of the Project. 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 further evaluation of this topic in an EIR is required.

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

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

XII. MINERAL RESOURCES

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

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

No Impact. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone or Surface Mining District where significant mineral deposits are known to be present or within a mineral producing area as classified by the California Geologic Survey.[60,61] The Project Site is also not located within a City-designated oil field or oil drilling area.[62] Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no further evaluation of this topic in an EIR is required.

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

No Impact. Refer to Response to Checklist Question XII.a., Mineral Resources, above. No impact would occur, and no further evaluation of this topic in an EIR is required.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

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

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

61 State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2018.

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

Potentially Significant Impact. During Project construction activities, 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. The closest private airstrip or airport is the Bob Hope Airport, which is approximately 7.3 miles north of the Project Site. In addition, the Project Site is not located within an area subject to an airport land use plan. Given the distance between the Project Site and the closest private airstrip and public airport, the Project would not have the potential to expose people that reside or work in the Project area to excessive noise levels from these sources of noise. No impacts would occur, and no further evaluation of this topic in an EIR is required.

XIV. POPULATION AND HOUSING

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

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

Less Than Significant Impact. The Project is a studio and creative office development. Since the Project does not propose a housing component, it would not directly induce a new residential population that would contribute to population growth in the vicinity of the Project Site. Additionally, while construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project. As previously discussed, the Project includes the development of a new 503,520-square-foot building comprised of 443,170 square feet of creative office space; 5,330 square feet of retail/restaurant space; and 55,020 square feet of commercial space anticipated to be occupied by recording and production studio and ancillary uses, including an auditorium and live performance venue. A two-story shopping center; a single-story commercial nursery; a single-story private school; a single-story private school building, and associated surface parking areas would be removed as part of the Project.

Based on employee generation factors from the City of Los Angeles Department of Transportation (LADOT)'s Vehicle Miles Traveled Calculator, the Project is estimated to generate 2,015 net new employees on the Project Site.[63] As noted above, the Project would not introduce new homes at the Project Site and would therefore not result in a direct population growth in the area. While some of the new employment positions could be filled by persons who would relocate to the vicinity of the Project Site, this potential increase in population would not be substantial since not all employees would move close to the Project Site. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project Site and other persons would commute to the Project Site from other communities. Compared against employment data from the 2020–2045 RTP/SCS, an estimated 1,967,307 employees are projected within the City of Los Angeles in 2028, the Project's buildout year, with 59,503 new employees projected in the City between 2022 and 2028. The Project's net increase in employment would represent 0.10 percent of the total number of employees in the City in 2028 and 3.39 percent of the growth between 2022 and 2028.

Overall, the provision of new jobs would constitute a small percentage of employment growth, would not be considered "unplanned growth," and would not produce such a high quantity of new jobs that it would have the possibility to induce unplanned residential growth. Therefore, the Project would not cause an exceedance of SCAG's employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities. As such, given that the Project would not directly contribute to substantial unplanned population growth in the Project area through the development of residential uses and as some of the employment opportunities generated by the Project would be filled

[63] LADOT and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. The existing commercial retail and private school uses to be removed generate approximately 85 employees and the Project would generate approximately 2,100 employees Therefore, the Project would generate approximately 2,015 net new employees. Refer to Table 4 of this Initial Study for employee generation rates for each use.

by people already residing in the vicinity of the Project Site or who would commute, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Further, as the Project would be located in a highly developed area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth.

Based on the above, the Project would not induce substantial unplanned population or housing growth. Impacts would be less than significant and 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 developed with a two-story, 24,114-square-foot shopping center; a single-story, 16,370-square-foot commercial nursery; a single-story, 21,795-square-foot private school; a single-story, 5,612-square-foot private school building, and associated surface parking areas. As no housing currently exists on the Project Site, the Project would not displace any existing persons or housing, or require the construction of replacement housing elsewhere. Therefore, the Project would not create any impacts related to displacement of people or housing, and 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:

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

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

Potentially Significant Impact. LAFD provides fire protection and emergency medical services for the Project Site. The Project would increase the floor area and associated occupancy on-site which could result in the need for additional fire protection services during Project operation. Additionally, construction activities have the potential to result in accidental on-site fires by exposing combustible materials to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. Therefore, further evaluation of this topic 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?

Potentially Significant Impact. Police protection for the Project Site is provided by the City of Los Angeles Police Department (LAPD). The Project would increase the floor area and associated occupancy on-site which could result in the need for additional police services during Project operation. Additionally, construction sites can be sources of nuisances and hazards and invite theft and vandalism. Therefore, further evaluation of this topic 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). LAUSD is divided into six local districts. The Project Site is located in Local District–West and is served by Gardner Street Elementary, Hubert Howe Bancroft Middle School, and Hollywood Senior High School.[64]

Construction

The Project would generate part-time and full-time jobs associated with construction of the Project between the start of construction and Project buildout. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, which require construction workers to commute to job sites that change many times in the course of a year, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. In addition, construction workers would be more likely to utilize schools near their places of residence. Therefore, the construction employment generated by the Project would not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts on school facilities during Project construction would be less than significant, and no further evaluation of this topic in an EIR is required.

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[64] Los Angeles Unified School District, Resident School Identifier, https://rsi.lausd.net/ResidentSchoolIdentifier/, accessed June 17, 2022.

Operation

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. In addition, the number of students that may be indirectly generated by the Project that could attend LAUSD schools serving the Project Site would not be anticipated to be substantial because not all employees of the Project are likely to reside in the vicinity of the Project Site. Furthermore, pursuant to Senate Bill 50, the Project Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered full legal mitigation of Project-related school impacts. Thus, the Project would not result in the need for new or altered school facilities. Therefore, impacts on school facilities during Project operation would be less than significant, and no further evaluation of this topic 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 (RAP). Nearby parks and recreational facilities within an approximate 2-mile radius of the Project Site include: De Longpre Park (0.25 mile), Selma Park (0.32 mile), Yucca Park and Community Center (0.37 mile), Dorothy and Benjamin Smith Park (0.46 mile), Las Palmas Senior Citizen Center (0.47 mile), Hollywood Pool (0.66 mile), Hollywood Recreation Center (0.66 mile), Runyon Canyon Dog Park (0.75 mile), Runyon Canyon Park (0.80 mile), Poinsettia Recreation Center (1.02 miles), Wattles Mansion and Gardens (1.05 miles), Wattles Garden Park (1.07 miles), Carlton Way Park (1.11 miles) Seily Rodriguez Park (1.43 miles), Fairfax Senior Citizen Center (1.70 mils), La Mirada Park (1.80 miles), Pan Pacific Park and Recreation Center (1.82 miles), and Renee's Place at Pan Pacific Park (1.82 miles).[65]

Construction

Given the temporary nature of construction activities, construction of a project would not introduce a permanent population to an area which could result in an increase in the use of existing parks and recreational facilities that would result in the need for new parks and recreational facilities or the expansion of existing facilities. Additionally, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Moreover, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, which require construction workers to commute to job sites that change many times in the course of a year, construction workers are not likely to relocate their

[65] City of Los Angeles Department of Recreation and Parks, Facility Map Locator within 2 miles, www.laparks.org/maplocator?cat_id=All&geo%5Bradius%5D=2&geo%5Blatitude%5D=34.0297417&geo%5Blongitude%5D=-118.2385139&address=1820%20E%208th%20St%2C%20Los%20Angeles%2C%20CA%2090021%2C%20USA, accessed June 17, 2022.

households as a consequence of the construction job opportunities presented by the Project. Thus, construction of the Project would not generate a demand for park facilities that cannot be adequately accommodated by existing or planned facilities and services. Therefore, the construction workers associated with the Project would not result in a notable increase in the residential population within the vicinity of the Project Site, which would result in a corresponding permanent demand for parks in the vicinity of the Project Site. Impacts on parks during Project construction would be less than significant and no further evaluation of this topic in an EIR is required.

Operation

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 an additional 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.

The Project would include approximately 28,593 square feet of landscaped open space, including 12,810 square feet of open space at the ground level and 15,783 square feet of open space on the fifth level. Specifically, on the ground level, the Project would include a plaza along Highland Avenue and a plaza on the corner of Highland Avenue and Sunset Boulevard. Level 5 would include a 15,783-square-foot event terrace with seating areas located between the interconnected towers and would also include a stage. Level six would include a terrace, located between and alongside the interconnected towers. The Project would also include terraces that overlook the event terrace on levels seven through 12 of the 12-story tower, and on levels seven through 14 of the 14-story tower.

As such, the Project's on-site open space would help to offset the demand for off-site parks and recreational facilities for the Project's net new employees creating new demand on the existing parks and recreational facilities. While it is possible that some of the Project's net new employees may utilize local parks and recreational facilities, this increased demand would be negligible due to the amount of time it would take for employees to access off-site local parks instead of the on-site facilities. In addition, Project employees would be more likely to use parks near their homes during non-work hours. Therefore, while the Project's net new employment opportunities could have the potential to indirectly increase the population of the Hollywood Community Plan area, that new demand for public parks and recreational facilities would be limited. Thus, the Project would not result in the need for new or altered park facilities, or substantially increase the demand for parks. The Project's impacts on parks during Project operation would be less than significant, and no further evaluation of this topic 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 provided to the Project Site include library services. The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles through its Central Library, 72 branch libraries, as well as through Web-based resources.[66] The Project area is served by existing LAPL facilities within the Hollywood Community Plan Area, including the Will and Ariel Durant Branch Library, which is the nearest to the Project Site located 0.5 mile to the east. In addition, the Frances Howard Goldwyn–Hollywood Regional Library is located 0.8 mile northeast of the Project Site.

Construction

As previously discussed, construction of the Project would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of Project construction. In addition, construction workers would be more likely to use libraries near their places of residence during non-work hours. Therefore, Project-related construction workers would not result in a notable increase in the resident population within the service area of either library serving the Project Site or an overall corresponding demand for library services in the vicinity of the Project Site. As such, construction of the Project would not exceed the capacity of local libraries to adequately serve the existing residential population based on target service populations or as defined by the LAPL. Project construction would not substantially increase the demand for library services for which current demand exceeds the ability of the facility to adequately serve the population. Therefore, impacts on library facilities during Project construction would be less than significant, and no further evaluation of this topic in an EIR is required.

Operation

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of residents within the service population of the local LAPL facilities. In addition, Project employees would have internet access to LAPL and other web-based resources, decreasing the demand on library facilities. Furthermore, as Project employees would be more likely to use library facilities near their homes during non-work hours and given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library services. Therefore, impacts on library facilities during Project operation would be less than significant, and no further evaluation of this topic in an EIR is required.

[66] Los Angeles Public Library Strategic Plan, 2015–2020.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

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

Less Than Significant Impact. As discussed above, there are numerous public parks and recreational facilities within 2 miles of the Project Site. The closest major park to the Project Site is DeLongpre Park, located approximately 0.25 mile southeast of the Project Site. DeLongpre Park includes a children's play area and benches.[67]

Construction

Given the temporary nature of construction activities, construction of a project would not introduce a permanent population to an area which could result in an increase in the use of existing parks and recreational facilities to an extent that substantial physical deterioration of the facilities would occur or be accelerated. Additionally, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Additionally, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, which require construction workers to commute to job sites that change many times in the course of a year, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. While there is a potential for construction workers to seek a nearby park to spend their lunch breaks, any resulting increase in the use of nearby parks and recreational facilities would be negligible. Therefore, the construction workers associated with the Project would not result in a notable increase in the residential population in the vicinity of the Project Site, which would result in a corresponding permanent demand for parks in the vicinity of the Project Site. Impacts on parks during Project construction would be less than significant.

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[67] City of Los Angeles Department of Recreation and Parks, Facility Map Locator, www.laparks.org/maplocator?cat_id=All&geo[radius]=2&geo[latitude]=34.098385&geo[longitude]=-118.3381057&address=6767%20Sunset%20Blvd,%20Los%20Angeles,%20CA%2090028,%20USA, accessed April 24, 2022.

Operation

As previously described, the Project does not propose the development of residential uses. While it is possible that some of the Project's new employees may utilize local parks and recreational facilities, this increased demand would be negligible due to the amount of time it would take for employees to access off-site local parks and recreational facilities. Furthermore, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. Thus, impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The Project would not include the construction of recreational facilities or require the expansion of recreational facilities, as discussed above in Response Checklist Question XV.d. Thus, impacts would be less than significant, and no 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?	☒	☐	☐	☐
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☒	☐	☐	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☒	☐	☐	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

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

Potentially Significant Impact. The City requires the preparation and submission of a Transportation Assessment for projects that meet the following criteria:

- If the project is estimated to generate a net increase of 250 or more daily vehicle trips and requires discretionary action, a transportation assessment for a Development Project is required.

- If a project is likely to either: (1) induce additional vehicle miles traveled by increasing vehicle capacity; or (2) reduce roadway through-lane capacity on a street that exceeds 750 vehicles per hour per lane for at least two (2) consecutive hours in a 24-hour period after the project is completed, a transportation assessment is generally required.

- A transportation assessment is required by City ordinance or regulation.

As described in Section 3, Project Description, of this Initial Study, the Project would introduce new uses to the Project Site and would increase the floor area over existing conditions. As such, the Project would meet the above criteria for preparation of Transportation Assessment. A Transportation Assessment in accordance with LADOT's Transportation Assessment Guidelines (TAG) will be prepared for the Project. In accordance with the TAG and consistent with the City CEQA Transportation Thresholds (adopted July 30, 2019), the TA's CEQA-required analyses will include an assessment of whether the Project would result in potential conflicts with transportation-related plans, ordinances, or policies. Therefore, further evaluation of this topic will be included in the EIR.

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

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

On July 30, 2019, the City 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 TAG, which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743. The Project would develop new commercial, office, and restaurant uses on the Project Site. As a result, VMT would increase over existing conditions. Therefore, further evaluation of this topic will be provided in the EIR.

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

Potentially Significant Impact. The Project would not introduce hazards due to incompatible uses such as farm equipment. However, the Project would include new access improvements, including driveways to the Project Site. As such, further evaluation of this topic will be provided in the EIR.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. According to the Safety Element, the nearest disaster route within the Project area is Santa Monica Boulevard, which is located approximately 0.5-mile south of the Project Site.[68] While it is expected that the majority of Project construction activities would be confined on site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Additionally, the proposed haul route for the Project would be located along North Highland Avenue north to SR-101 south.

With regard to operation, the Project does not propose the closure of any local public streets, and primary access to the Project Site would continue to be provided from the adjacent roadways. In addition, the Project would comply with LAFD access requirements, including required fire lane widths, turning radii, secondary access, etc., and plot plans would be submitted to LAFD for approval. Therefore, the Project would not result in inadequate emergency access to the Project Site or surrounding uses. Impacts regarding emergency access would be less than significant, and 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:

	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	☒	☐	☐	☐

[68] Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐

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

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

Potentially Significant Impact (Checklist Questions XVIII.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 noted above, the Project would require excavations approximately 65 feet below bgs for the six subterranean levels, and a maximum of approximately 87 feet bgs in the approximate lowest proposed bottom of excavation surfaces from the approximate highest current ground surface which could have the potential to disturb 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. In compliance with AB 52, the City will notify all applicable tribes,

and the City will participate in any requested consultations for the Project. Further evaluation of this topic will be provided in the EIR.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☒	☐	☐	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☒	☐	☐	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☒	☐	☐	☐
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

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

Potentially Significant Impact. Water, wastewater, electric power, and natural gas systems consist of two components, the source of the supply or place of treatment (for wastewater) and the conveyance systems (i.e., distribution lines and mains), 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 water, electricity, and natural gas demand and wastewater generation, further analysis of these topics will be provided in the EIR. Provided below is a discussion of the Project's impacts related to stormwater drainage and telecommunication facilities.

With regard to stormwater drainage, as discussed above in Response to Checklist Question X.c.iii., the Project Site's impervious area would slightly increase from approximately 91.3 percent to approximately 90 percent as a conservative assumption, upon buildout of the Project. However, as detailed in the Water Resources Report, a comparison of the pre- and post-Project peak flow rates indicates a decrease in stormwater runoff from the Project Site from 5.78 cubic feet per second (cfs) under existing conditions to 5.53 cfs with buildout of the Project. Under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on site for the volume of water produced by the 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 proposes to include infiltration as established by the LID Manual. As part of the LID plan for the Project to manage post-construction stormwater runoff, the Project would install building roof drain downspouts, catch basins, and planter drains throughout the Project Site, which would collect roof and site runoff and direct stormwater away from buildings through a series of building storm drain pipes that would drain to the existing stormwater drainage system off-site. As such, the Project would not create runoff which would exceed the capacity of existing or planned drainage systems. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

With respect to telecommunications facilities, the Project would require construction of new on-site telecommunications infrastructure to serve the new building 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. Such activities could involve temporary closure of portions of sidewalks or travel lanes. However, the Project would ensure safe pedestrian access is maintained throughout construction, as well as emergency vehicle access and safe vehicle travel in general, to reduce any temporary pedestrian and traffic impacts occurring as a result of construction activities. 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?

Potentially Significant Impact. LADWP supplies water to the Project Site. Given the Project's increase in floor area on the Project Site and the associated employee population, the Project would increase demand for water provided by LADWP. Therefore, further evaluation of this topic will be provided in the EIR.

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

Potentially Significant Impact. Refer to Response to Checklist Question XIX.a. above. As discussed therein, the Project would result in an increase in wastewater generation from the Project Site. Therefore, further evaluation of this topic will be provided in the EIR.

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

Less Than Significant Impact. While the Los Angeles Bureau of Sanitation (LASAN) 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, commercial and institutional 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 Los Angeles County are categorized as either Class III (e.g., landfills permitted to accept non-hazardous and non-designated solid waste) 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, is disposed of in inert waste landfills.[69] Ten Class III landfills and one inert landfill are currently operating within the County.[70] In addition, there is one solid waste transformation facility within Los Angeles County (Southeast Resource Recovery Facility) that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery.[71]

Based on the 2020 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the most recent report available, the total amount of solid waste disposed of at in-county Class III landfills, transformation facilities, and exported to out-of-County landfills was 14.57 million tons in 2020. The total remaining permitted Class III landfill capacity in the County is estimated at 142.67 million tons, with a total estimated daily disposal rate of 36,544 tons per day, and the remaining lifespan of each landfill ranges from 8 to 35 years. The estimated remaining capacity for the County's Class III landfills open to the City of Los Angeles is approximately 132.58 million tons as of December 31, 2020.[72] In addition, the permitted

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

70 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021. The ten Class III landfills serving the County include the Antelope Valley Landfill, Burbank Landfill, Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, San Clemente Landfill, Whittier (Savage Canyon) Landfill, Scholl Canyon Landfill, and Sunshine Canyon City/County 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, Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021.

72 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020, Appendix E-2 Table 4. This total excludes Class III landfills not open to the City of Los Angeles for disposal (i.e., Scholl Canyon, Whittier, Burbank, Pebbly Beach, and San Clemente). In addition, this total excludes the Calabasas Landfill, as its wasteshed does not include the Project Site.

inert waste landfill serving the County is Azusa Land Reclamation.[73] This facility has 64.64 million tons of remaining capacity and an average daily in-County disposal rate of 1,032 tons per day.[74] Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the CoIWMP Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.[75]

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

Construction

As previously discussed, the Project includes the development of a new approximately 503,520-square-foot building comprised of 443,170 square feet of creative office space; 5,330 square feet of retail/restaurant space; and 55,020 square feet of commercial space anticipated to be occupied by recording and production studio and ancillary uses, including an auditorium and live performance venue. A two-story shopping center; a single-story commercial nursery; a single-story private school; a single-story private school building, and associated surface parking areas would be removed as part of the Project. 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 its non-hazardous demolition and construction debris. In addition, 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 2 on page 95, the Project would generate a total of approximately 6,327 tons of demolition debris and 979 tons of construction debris, for a combined total of 6,241 tons of construction-related waste generation. As discussed above, inert waste, such as construction waste, yard trimmings, and earth-like waste, is disposed of in inert waste landfills. Applying the 75 percent diversion rate, the Project would dispose of approximately 1,827 tons of construction-related waste in Azusa Land Reclamation Landfill throughout the construction period. This amount of construction and debris waste would represent approximately 0.003 percent of the Azusa Land Reclamation Landfill's remaining disposal capacity of 64.64 million tons.[76] It should be noted that soil export is not included in the calculation of construction waste 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. As reported above, the Azusa Land Reclamation landfill, the County's inert waste landfill, would be able to accommodate waste from the Project's construction activities.

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[73] As of 2020, according to the Los Angeles County Integrated Waste Management Plan 2020 Annual Report, the Azusa Land Reclamation facility is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

[74] County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021.

[75] County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021.

[76] 1,827 tons ÷ 64.64 million tons = 0.003 percent.

Table 2
Project Demolition and Construction Waste Generation and Disposal

Land Use	Size	Generation Rate (lbs/sf)	Total (tons)[a]
Demolition Waste			
Surface Parking	13,750	155	1,066
Shopping Center	24,114 sf	155	1,869
Nursery	16,370 sf	155	1,269
Private School	27,407 sf	155	2,124
Total Demolition Waste			*6,327*
Construction Waste			
Creative Office Space	443,170 sf	3.89	*862*
Retail/Restaurant	5,330 sf	3.89	*10*
Recording and Production Studio	55,020 sf	3.89	107
Total Construction Waste			*979*
Total Demolition and Construction Waste (prior to diversion)			**7,307**
Total Disposal (After 75% Diversion)			**1,827**

lbs = pound

sf = square feet

[a] *Numbers may not add up exactly due to rounding.*

Source: U.S. Environmental Protection Agency, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, Report No. EPA530-R-09-002, March 2009, Tables 2-4 and 2-6; Eyestone Environmental, 2022.

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, the Project's potential construction-related impacts on solid waste facilities would be less than significant, and no further evaluation of this topic in the EIR is required.

Operation

Based on employee generation factors from the City of Los Angeles Department of Transportation (LADOT)'s Vehicle Miles Traveled Calculator, the Project is estimated to generate 2,015 net new employees on the Project Site.[77] As shown in Table 3 on page 96, based on solid waste generation factors from LASAN, the Project would generate approximately 4,661 net tons of solid waste per year. The estimated amount of solid waste is conservative because the waste generation factors do not account

[77] LADOT and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. The existing commercial retail and private school uses to be removed generate approximately 85 employees and the Project would generate approximately 2,100 employees Therefore, the Project would generate approximately 2,015 net new employees. Refer to Table 4 of this Initial Study for employee generation rates for each use.

Table 3
Estimated Project Solid Waste Generation

Land Use	Size	Employee Generation Rate[a]	Estimated No. of Employees	Solid Waste Generation Rate[b]	Total Generation (tons/year)
Existing to Be Removed					
Shopping Center	24,114 sf	0.002	48	1.96 tn/emp/yr	95
Nursery	16,370 sf	0.002	33	1.96 tn/emp/yr	64
Private School	27,407 sf	0.00015	4	0.45 tn/emp/yr	2
Total Existing to Be Removed					161
Proposed					
Creative Office Space	443,170 sf	0.004	1,773	2.30 tn/emp/yr	4,077
Retail/Restaurant	5,330 sf	0.004	21	1.96 tn/emp/yr	42
Recording and Production Studio	55,020 sf	0.0056	306	2.30 tn/emp/yr	703
Total with Implementation of Project					4,822
Total Net Increase (prior to diversion)					**4,661**
Total Net Disposal (after 50% diversion/recycling)					2,331

tn = tons

emp = employees

yr = year

[a] *Except for sound stages, employee Generation Rates from Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, Table 1, May 2020. Based on the employee generation rate of 2.0 employees per 1,000 square feet for "General Retail," 4.0 employees per 1,000 square feet for "General Office," and 4.0 employees per 1,000 square feet for "High-Turnover Sit-Down Restaurant." For recording and production studio uses, the rounded rate assumes 100 employees for a typical 18,000 sf sound stage; source: Manhattan Beach Studios (MBS), June 2021*

[b] *Employee yearly solid waste generation factors for business group from CalRecycle's 2014 Waste Characterization Study, www2.calrecycle.ca.gov/wastecharacterization/businessgrouprates, accessed September 12, 2022. Based on the waste generation rate of 1.96 ton per employee per year (Retail Trade—All Other), 0.45 ton per employee per year (Education), and 2.30 ton per employee per year (Arts, Entertainment, and Recreation).*

Source: Eyestone Environmental, 2022.

for recycling or other waste diversion measures. For example, the estimate does not take into account AB 939, which requires California cities, counties, and approved regional solid waste management agencies responsible for enacting plans and implementing programs to divert 50 percent of their solid waste away from landfills. The estimate also does not take into account compliance with AB 341, which requires California commercial enterprises and public entities that generate 4 or more cubic yards per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's recycLA franchising system, which is expected to

result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.

The Project's estimated solid waste disposal of 4,661 tons per year represents approximately 0.0035 percent of the remaining capacity (132.58 million tons) at the County's Class III landfills that are open to the City of Los Angeles. The Project's estimated solid waste generation would therefore represent a nominal percentage of the remaining daily disposal capacity of those landfills. As such, Project operation 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, the Project's potential operational impacts to solid waste facilities would be less than significant, and no further evaluation of this topic in an EIR is required.

Furthermore, as described in the 2020 Annual Report, 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 of Los Angeles continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning directives. These efforts, together with countywide and regional programs implemented by the County and the cities, acting in concert or independently, have achieved significant, measurable results, as documented in the 2020 Annual Report.

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

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

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste 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 GHG emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The plan also calls for reductions in the

quantity and environmental impacts of residue material disposed in landfills. In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste[78] 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.

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.[79] The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste, impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

XX. WILDFIRE

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

[78] 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.

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

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

No Impact. As discussed above, the Project Site is located in an urbanized area and is developed with relatively flat topography. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone.[80,81] Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones and would not result in impacts related to impairing an adopted emergency response plan or emergency evaluation plan within a wildfire area. No impacts regarding wildfire risks or related post-fire conditions would occur, and no further evaluation of this topic in the EIR is required.

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?

No Impact. As discussed above, the Project Site is relatively flat and is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone. In addition, there is no accumulation of dry vegetation within the Project Site to fuel wildfires, or wildlands or steep slopes located in the vicinity of the Project Site or frequent strong wind events to exacerbate wildfires. Therefore, as the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones and due to the flat topography of the Project Site and surrounding area, the Project would not result in impacts related to exacerbating wildfire risks. No impacts regarding wildfire risks or related post-fire conditions would occur, and no further evaluation of this topic in the EIR is required.

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?

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80 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5547-020-019, -041, -046, and -047 http://zimas.lacity.org/, accessed April 22, 2022. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

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

No Impact. As discussed above, the Project Site is located in an urbanized area, and is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone. As the Project Site is not located within or near state responsibility areas or lands classified as very high fire hazard severity zones, the Project would not require the installation or maintenance of associated infrastructure such as roads, fuel breaks, or emergency water sources to assist with fire suppression in a wildfire area. Therefore, while the Project could require utility improvements to connect the new buildings to the main infrastructure, such improvements would not be located within or near state responsibility areas or lands classified as very high fire hazard severity zones and would not be considered wildfire area associated infrastructure. No impacts regarding wildfire risks or related post-fire conditions would occur, and no further evaluation of this topic in the EIR is required.

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. As previously described, the Project Site is relatively flat and is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone. Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. As such, a wildfire which could result in downstream flooding, landslides, runoff, or other post-fire instability after the wildfire has been extinguished could not occur at the Project Site as no such conditions exist on the Project Site. No impacts regarding wildfire risks or related post-fire conditions such as landslides or slope instability would occur, and no further evaluation of this topic in the EIR is required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

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

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

As discussed above, the Project would require excavation up to a depth of approximately 65 feet below bgs for the six subterranean levels, and a maximum of approximately 87 feet bgs in the approximate lowest proposed bottom of excavation surfaces from the approximate highest current ground surface, and the Project could have the potential to disturb previously undiscovered archaeological and paleontological resources. Therefore, the Project would have the potential to impact important examples of the major periods of California history or prehistory. Further evaluation of the Project's potential impacts to cultural resources will be included in an EIR.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Potentially Significant Impact. The potential for cumulative impacts occurs when the impacts of the Project are combined with impacts from related development projects and result in impacts that are greater than the impacts of the Project alone. Located in the vicinity of the Project Site are other current and reasonably foreseeable projects, the development of which, in conjunction with the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in the EIR for the following subject areas: air quality; cultural resources (historic and archaeological resources); energy; geology and soils (including paleontological resources); GHG emissions; land use and planning; noise; public services (police protection and fire protection); transportation; tribal cultural resources; and utilities and service systems (water supply, wastewater, electric power, and natural gas systems).

The Project would not contribute to cumulative impacts with regard to the following topics, which were determined to be less than significant in this Initial Study:

- **Aesthetics**— Pursuant to SB 743 and ZI No. 2452, the Project is considered an employment center project on an infill site within a transit priority area, and thus in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered a significant impact on the environment. Given the level of urbanization and transit in the Project vicinity, the majority of related projects would likewise be subject to SB 743 and could not combine with the Project to generate cumulative impacts under CEQA. Any related projects that are not subject to SB 743 would require appropriate analysis of potential impacts and mitigation, as necessary, to reduce such impacts to the extent feasible.

- **Agriculture, Forestry Resources, and Mineral Resources**—With regard to agriculture, forest resources, and mineral resources, no such resources are located on the Project Site or in the surrounding area. The Project would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts. As such, cumulative impacts to agriculture, forest resources, and mineral resources would be less than significant.

- **Biological Resources**—The Project vicinity is highly urbanized, and similar to the Project, other developments occurring in the vicinity would occur on previously disturbed land. The Project Site does not contain any sensitive biological resources, and there are no native or protected trees located on-site or within the adjacent rights-of-way. Like the Project, related projects involving tree removals would be required to comply with the Migratory Bird Treaty Act, which regulates vegetation removal during the nesting season to ensure significant impacts to migratory birds do not occur. As such, the Project would not contribute to a cumulative impact associated with biological resources.

- **Cultural Resources (Human remains)**—With regard to human remains, like the Project, if human remains are discovered during construction of the related projects, work in the immediate vicinity of the construction area would be halted, and the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e) like the Project. Therefore, compliance with the regulatory standards would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Geology and Soils (landslides and septic tanks**)—Due to their site-specific nature, geology and soils impacts, including those related to landslides and the ability of soils to support septic tanks or alternative wastewater disposal systems, 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. Thus, impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

- **Hazards and Hazardous Materials**—Due to their site-specific nature, hazards and hazardous materials impacts are typically assessed on a project-by-project basis. Therefore, as with the Project, related projects would address site-specific hazards through the implementation of site-specific recommendations and/or mitigation measures. In addition, as with the Project, all related development located in the vicinity of the Project Site would be subject to local,

regional, state, and federal regulations pertaining to hazards and hazardous materials. Therefore, with adherence to applicable regulations and implementation of site-specific recommendations and/or mitigation measures, cumulative impacts would be less than significant.

- **Hydrology and Water Quality—**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, the related projects would be subject to NPDES permit requirements for both construction and operation, including development of SWPPPs for construction projects greater than 1 acre and compliance with local requirements pertaining to hydrology and surface water quality. It is anticipated that the related projects would be evaluated on an individual basis by the City during both site plan review and CEQA review (if applicable) to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. Lastly, as indicated in Checklist Question No. X, Hydrology and Water Quality, of this Initial Study, the Project would result in less than significant hydrology and water quality impacts due to BMP measures such as proposed infiltration, if feasible, and regulatory compliance. As also indicated in Checklist Question No. X, the Project is not proposed in a floodplain, would not impede/redirect flood flows, and would not be subject to inundation by 100-year flood flows, seiches or tsunamis. Therefore, the Project would not contribute considerably to cumulative hydrology and water quality impacts, and cumulative hydrology and water quality impacts would be less than significant.

- **Land Use and Planning (Physically divide an established community)**—As discussed above, the Project would be implemented within the boundaries of the Project Site, and would not involve the closure of any surrounding streets that could impede access to surrounding properties. As such, Project-level impacts related to physically dividing an established community would be less than significant, and therefore could not combine with other projects in the vicinity of the Project Site to result in cumulative impacts. Cumulative impacts would be less than significant.

- **Noise (Private airstrip or an airport land use plan)**—Due to the site-specific nature, impacts related to projects exposing people that reside or work in the vicinity of related projects to excessive noise levels from a private airstrip or airport are typically assessed on a project-by-project basis. The Project Site is not located in the vicinity of a private airstrip or within an area subject to an airport land use plan. The Project would have no impact, and therefore could not combine with other projects to result in cumulative impacts. As such, cumulative impacts would be less than significant.

- **Population and Housing**—Not all related projects would include residential uses. As discussed in the analysis above, the Project does not propose residential uses and thus would not directly contribute to population growth. As part of the environmental review processes for the related projects, it is expected that mitigation measures would be established as necessary to address potential impacts related to population and housing. Thus, the Project impacts related to population and housing would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Public Services (Schools, Parks, and Libraries)—**Similar to the Project, construction of related projects would generate part-time and full-time jobs associated with construction of the related projects between the start of construction and buildout. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, which require construction workers to commute to job sites that change many times in the course of a year, construction workers are not likely to relocate their

households as a consequence of the construction job opportunities presented by the Project. Therefore, like the Project, the construction employment generated by related projects would not result in a notable increase in the resident population or a corresponding demand for schools, parks, and libraries in the vicinity of the Project Site.

- With regard to operation, the Project would not generate a residential population that would directly increase the demand for schools, parks, and libraries, although the increase in commercial development could indirectly increase the demand for these services. Other related projects could also increase the demand for these services and facilities. However, in the case of schools, the applicants for most related projects would 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), projects with residential components would be required by the LAMC to include open space and pay park in-lieu fees (as required), which would help reduce the demand on neighborhood and regional parks, thereby reducing the likelihood that there would be substantial deterioration of parks. Employees generated by the non-residential related projects would be more likely to use parks and library facilities near their homes during non-work hours, as opposed to patronizing local facilities on their way to or from work or during their lunch hours. In addition, each related project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could be applied toward the provision of enhancing park facilities and library services in the City, as deemed appropriate. These revenues to the City's General Fund would help offset the increase in demand for park facilities and library services as a result of the Project and the related projects. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to schools, parks, and libraries. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Utilities and Service Systems–Solid Waste**—The Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction periods. However, as discussed in Checklist Question No. XIX, unclassified landfills in the County do not generally have capacity concerns, and inert landfills serving the Project and the related projects would have sufficient capacity to accommodate construction waste disposal needs. With regard to operational solid waste disposal needs, the increase in solid waste generated by the Project would be well within the capacity of existing landfills, as discussed in Checklist Question No. XIX of this Initial Study. In addition, with the implementation of solid waste policies and objectives intended to help achieve the requirements of AB 939 and the City's 90 percent diversion goal, it is expected that the Project and related projects would not substantially reduce the projected timeline for landfills within the region to reach capacity. Furthermore, the County of Los Angeles conducts ongoing evaluations to ensure that landfill capacity is adequate to serve the forecasted disposal needs of the region. Therefore, the Project would not contribute considerably to cumulative solid waste impacts, and cumulative solid waste impacts would be less than significant.

- **Wildfire**—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 and LAFD requirements pertaining to fire safety. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to wildfires. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

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

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project could result in potentially significant impacts with regard to the following topics: air quality; cultural resources (historic and archaeological resources); energy; geology and soils (including paleontological resources); greenhouse gas emissions; land use and planning; noise; public services (police protection and fire protection); transportation; tribal cultural resources; and utilities and service systems (water supply, wastewater, electric power, and natural gas systems). Further evaluation of the Project's potential impacts to these topics will be included in an EIR.