



1000 Seward Project

Case Number: ENV-2020-1239-EIR

Project Location: 1000 and 1006 North Seward Street; 1003, 1007, and 1013 North Hudson Avenue; and 6565 West Romaine Street, Los Angeles, California 90038

Community Plan Area: Hollywood

Council District: 13—O'Farrell

Project Description: The 1000 Seward Project includes the development of a ten story-mixed use office building (with an additional rooftop level for mechanical equipment and tenant terrace) on a 34,167-square-foot (0.78-acre) site in the Hollywood Community Plan Area of the City of Los Angeles. The Project would include the development of new office, restaurant, and retail uses totaling 150,600 square feet in one of two development options. Under Option A, the Project would develop 136,200 square feet of office uses, 12,200 square feet of restaurant uses (of which 6,100 square feet may be used for an entertainment use), and 2,200 square feet of retail uses. Under Option B, the Project would develop 134,100 square feet of office uses, 14,300 square feet of restaurant uses (of which 6,100 square feet may be used for an entertainment use), and 2,200 square feet of retail uses. The Project would provide 310 vehicular parking spaces and 58 bicycle parking spaces within four subterranean parking levels, one at-grade level that would be enclosed with the exception of the entrance, and three fully-enclosed and mechanically ventilated above grade parking levels. Upon completion of either option, the Project would result in 150,600 square feet of floor area within the Project Site with a floor area ratio (FAR) of 4.4:1.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

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APPLICANT:

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December 2020

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1 INTRODUCTION

An application for the proposed 1000 Seward Project (Project) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles (City), as Lead Agency, has determined the Project is subject to the California Environmental Quality Act (CEQA) and that the preparation of an Initial Study is required.

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

1.1 PURPOSE OF AN INITIAL STUDY

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

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

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

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1. INTRODUCTION

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

2. EXECUTIVE SUMMARY

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

3. PROJECT DESCRIPTION

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

4. EVALUATION OF ENVIRONMENTAL IMPACTS

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

1.3 CEQA PROCESS

Below is a general overview of the CEQA process. The CEQA process is guided by the CEQA statutes and guidelines, which can be found on the State of California's website (<http://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 has 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 adequacy of the document, including the analysis of environmental effects, the mitigation measures presented to reduce potentially significant impacts, and the alternatives analysis. After the close of the 45-day review and comment period, responses to all comments on environmental issues received during the comment period are prepared.

1.3.3 Final EIR

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

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

2 EXECUTIVE SUMMARY

PROJECT TITLE	1000 SEWARD
ENVIRONMENTAL CASE NO.	ENV-2020-1239-EIR
RELATED CASES	CPC-2020-1237-GPA-VZC-HD-CU-MCUP-WDI-SPR

PROJECT LOCATION	1000 and 1006 North Seward Street; 1003, 1007, and 1013 North Hudson Avenue; and 6565 West Romaine Street, Los Angeles, California 90038
COMMUNITY PLAN AREA	Hollywood
GENERAL PLAN DESIGNATION	Limited Manufacturing and Medium Residential
ZONING	MR1-1 and R3-1
COUNCIL DISTRICT	13—O'Farrell

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

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

- | | | |
|---|--|--|
| <input type="checkbox"/> Aesthetics | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Air Quality | <input type="checkbox"/> Hydrology/Water Quality | <input checked="" type="checkbox"/> Transportation |
| <input type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Land Use/Planning | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Utilities/Service Systems |
| <input checked="" type="checkbox"/> Energy | <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Population/Housing | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of a mitigation measure has reduced an effect from “Potentially Significant Impact” to “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The 1000 Seward Project includes the development of a ten story-mixed use office building (with an additional rooftop level for mechanical equipment and tenant terrace) on a 34,167-square-foot (0.78-acre) site located at 1000 Seward Street (Project Site) in the Hollywood Community Plan Area of the City of Los Angeles. Specifically, the Project would include the development of new office, restaurant, and retail uses totaling 150,600 square feet in one of two development options. Under Option A, the Project would develop 136,200 square feet of office uses, 12,200 square feet of restaurant uses (of which 6,100 square feet may be used for an entertainment use), and 2,200 square feet of retail uses. Under Option B, the Project would develop 134,100 square feet of office uses, 14,300 square feet of restaurant uses (of which 6,100 square feet may be used for an entertainment use), and 2,200 square feet of retail uses. Under either option, the proposed uses would be located within a single ten-story building (with an additional rooftop level for mechanical equipment) with a maximum height of 133 feet to the top of the highest occupiable level and a maximum height of 155 feet to the top of the mechanical equipment level. In accordance with the Los Angeles Municipal Code (LAMC), the Project would provide 310 vehicular parking spaces and 58 bicycle parking spaces (36 long-term and 22 short-term) within four subterranean parking levels, one at-grade level that would be enclosed with the exception of the entrance, and three fully-enclosed and mechanically ventilated above grade parking levels. An existing restaurant and studio and production space, totaling 2,551 square feet and 8,442 square feet, respectively, along with a surface parking lot would be demolished to accommodate the Project under Option A. An alternative building design is also proposed as Option B that would allow the 2,551- square-foot restaurant to remain. Upon completion of either option, the Project would result in 150,600 square feet of floor area within the Project Site with a floor area ratio (FAR) of 4.4:1.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

As shown in Figure 1 on page 8, the Project Site is located at 1000 and 1006 Seward Street; 1003, 1007, and 1013 Hudson Avenue; and 6565 Romaine Street, within the Hollywood Community Plan area of the City. As shown in Figure 2 on page 9, the Project Site is bounded by portions of a one-story brick building and an approximately 64-foot-tall parking structure to the north, an above-grade parking structure to the west and industrial uses to the south, and multi-family residential buildings to the east. Regional access to the Project Site is provided by Santa Monica Boulevard, located approximately 0.12 mile north of the Project Site and the Hollywood Freeway (US-101) located approximately 1.5 miles east of the Project Site. Local access to the Project Site is provided by Hudson Avenue, Seward Street, and Romaine Street.

3.2.2 Existing Conditions

As shown in Figure 2 on page 9, the Project Site is currently developed with two one-story buildings totaling 10,993 square feet, comprised of a 2,551 square-foot restaurant and 8,442 square-foot studio and production space, along with surface parking areas. Vehicular access to the Project Site is provided via

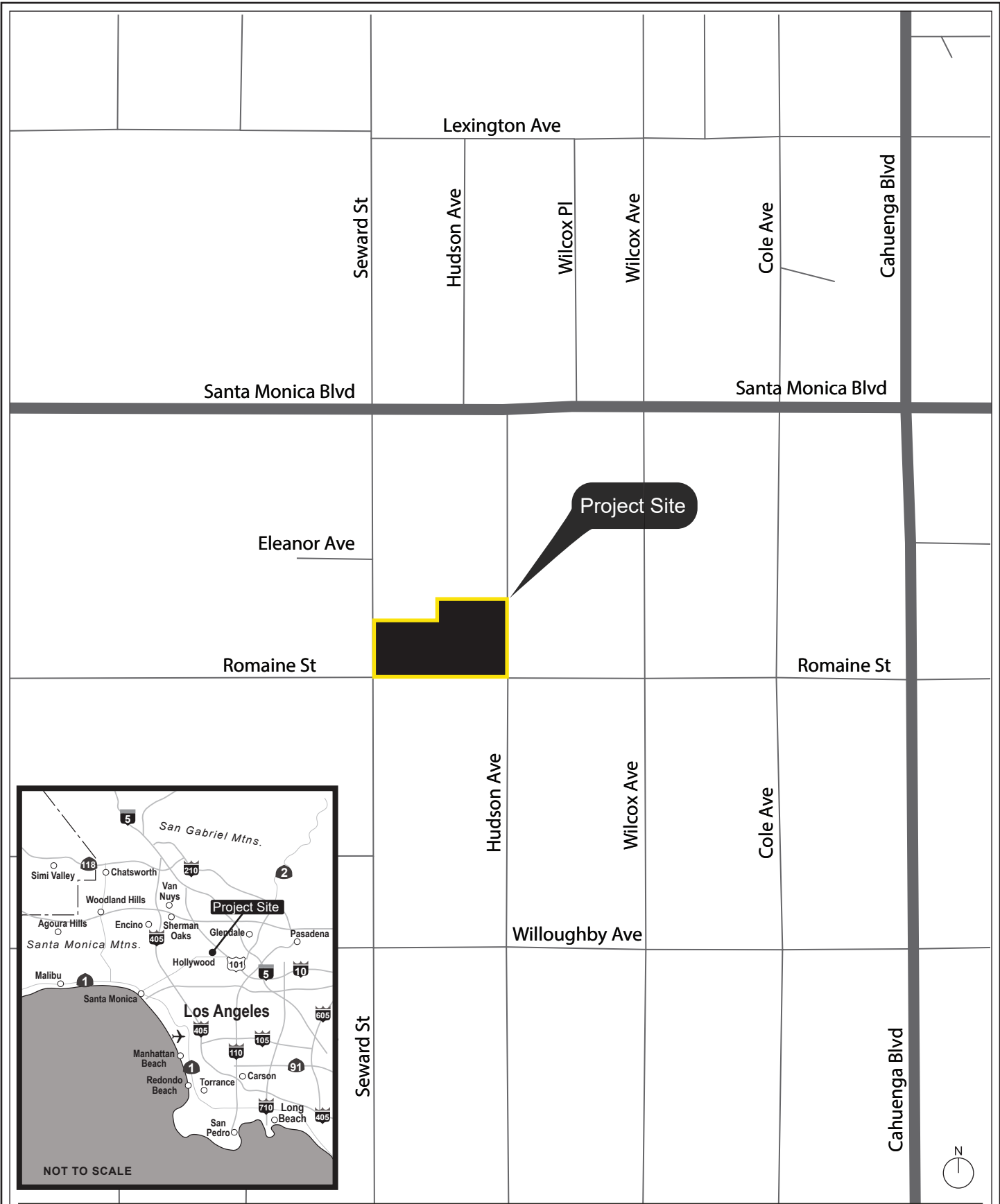


Figure 1
Project Location Map

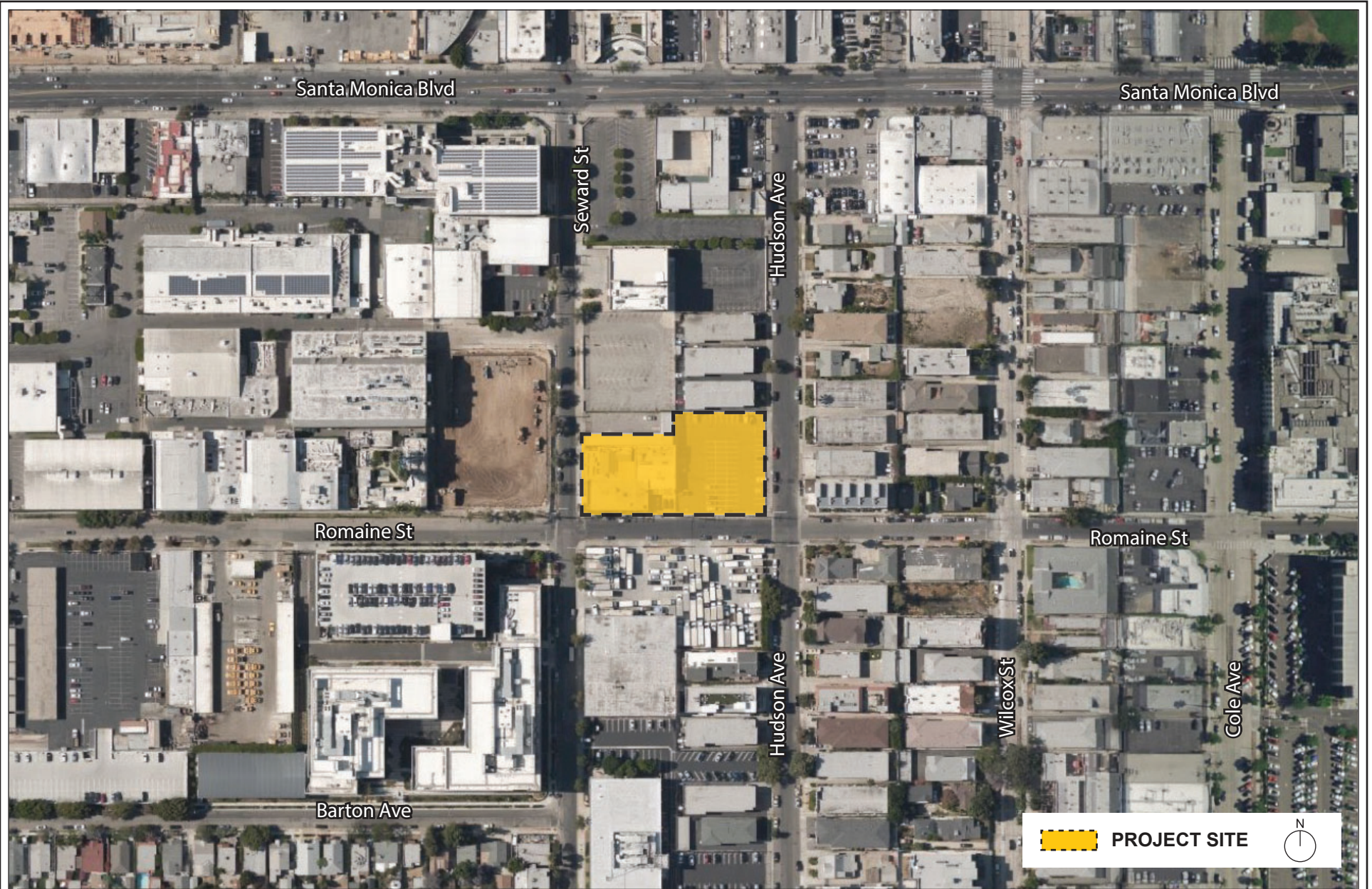


Figure 2
Aerial of the Project Vicinity

driveways along Seward Street, Romaine Street, and Hudson Avenue. Pedestrian access to the Project Site is located along Seward Street and Romaine Street in the form of concrete sidewalks.

Existing landscaping within the Project Site includes several trees and plants within small planted areas. There is one Hollywood juniper located on the Project Site that would be removed as part of the Project. The Hollywood juniper is not protected under the City's Protected Tree Ordinance. There are also giant birds of paradise adjacent to the buildings along Seward Street and Romaine Street that would be removed as part of the Project, but these do not meet the definition of a tree.² In addition, there are no City right-of-way trees adjacent to the Project Site.

The Project Site is located within the Hollywood Community Plan³ area. The Project Site has a General Plan land use designation of Limited Manufacturing and Medium Residential and is zoned MR1-1 (Restricted Industrial, Height District 1) and R3-1 (Multiple Dwelling, Height District 1). Pursuant to the LAMC, the MR1 Zone permits CM (commercial manufacturing) uses, including limited commercial and manufacturing, clinics, media production limited machine shops, animal hospitals, and kennels. The R3 Zone permits R2 (two-family dwellings) uses, including apartment houses, multiple dwellings, and child care (20 children maximum) uses. The Height District 1 designation, in conjunction with the R3 Zone has a height limit of 45 feet and an FAR of 3:1. The Height District 1 designation for the MR1 Zone permits an FAR of 1.5:1, but does not impose a maximum building height limit. The Project Site is also located within the boundaries of the Los Angeles State Enterprise Zone and Revised Hollywood Community Plan Injunction.⁴

The Project Site is served by a variety of public transit options provided by the Los Angeles County Metropolitan Transit Authority (Metro) and the Los Angeles Department of Transportation (LADOT). Specifically, transit options in the vicinity of the Project Site include the Hollywood/Vine station of the Metro B (Red) Line located approximately 1 mile northeast of the Project Site; Metro bus line 4 located approximately 0.2 mile northeast of the Project Site; 237, 656, and 704 located approximately 0.3 mile northwest of the Project Site; and DASH Hollywood located approximately 0.4 mile north of the Project Site.

3.2.3 Surrounding Land Uses

The Project Site is located in a highly urbanized area developed with a mix of commercial, industrial, and residential uses. Land uses located adjacent to the Project Site include portions of a one-story brick

² The arboricultural industry's Best Management Practices define a tree as "a woody perennial plant with single or multiple trunks, which typically develops a mature size of over several inches in diameter, has a raised canopy, and is 10 feet or more in height." Conversely, a shrub is a smaller, usually multi-stemmed, and has a low canopy. Refer to the Tree Survey included as Appendix IS-1 of this Initial Study.

³ The City is currently in the process of updating the Hollywood Community Plan. The most recent draft was released in August 2020 and is available at <https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update#the-plan>.

⁴ As of April 2, 2014, the 2012 Hollywood Community Plan Update (HPCU) and its associated zoning ordinance (Ordinance No. 182,173) have been rescinded. Per City Zoning Information (ZI) File No. 2433, the Department of Building and Safety shall not issue any permit unless the project receives an HCPU Injunction REVISED Clearance from the Department of City Planning confirming that the project conforms to the General Plan Land Use designation, including street classifications, and the zoning regulations in place prior to June 19, 2012, i.e., the 1988 Hollywood Community Plan and corresponding zoning ordinances.

building and an approximately 64-foot-tall parking structure to the north; a 76-foot-tall office building, and an above-grade parking structure to the west; a 76-foot-tall office/commercial building and industrial uses to the south; and multi-family residential buildings to the east. The uses surrounding the Project Site have a land use designation of Medium Residential along with Limited Manufacturing and are zoned R3-1 (Multiple Dwelling, Height District 1), MR1-1 (Restricted Industrial, Height District 1), MR1-1-SN (Restricted Manufacturing, Height District 1, Sign District), (T)(Q)M1-1-SN (Tentative Zone Classification, Qualified Classification, Limited Manufacturing, Height District 1, Sign District).

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

As discussed above and shown in Table 1 on page 12, the Project would develop new office, restaurant, and retail uses totaling 150,600 square feet in one of two development options. Under Option A, the Project would demolish both existing buildings on the Project Site and develop 136,200 square feet of office uses, 12,200 square feet of restaurant uses (of which 6,100 square feet may be used for an entertainment use), and 2,200 square feet of retail uses. Under Option B, the existing 8,442 square-foot studio and production space would be demolished, but the 2,551 square-foot restaurant would be retained, and the Project would develop 134,100 square feet of office uses, 14,300 square feet of restaurant uses (of which 6,100 square feet may be used for an entertainment use), and 2,200 square feet of retail uses. Under either option the proposed uses would be located within a single ten story building (with an additional rooftop level for mechanical equipment) with a maximum height of 133 feet to the top of the highest occupiable level and a maximum height of 155 feet to the top of the mechanical equipment level. In accordance with the LAMC, both options would provide 310 vehicular parking spaces and 58 bicycle parking spaces (36 long-term and 22-short term) within four subterranean levels, one at-grade level that would be enclosed with the exception of the entrance, and three fully-enclosed and mechanically ventilated above grade parking levels. Under either option, the Project would result in 150,600 square feet of floor area within the Project Site with a FAR of 4.4:1.

3.3.2 Design and Architecture

As previously discussed, under either option, the proposed uses would be located within a single ten story building (with an additional rooftop level for mechanical equipment and tenant terrace) with a maximum height of 133 feet to the top of the highest occupiable level and a maximum height of 155 feet to the top of the mechanical equipment level. Under Option A, as shown in Figure 3 on page 13, the proposed building's ground floor would include the commercial, retail, restaurant uses including an outdoor dining area, a lobby, and parking. Above the ground level, Level 2 would include additional parking and additional office use. Levels 3 through 9 would include office uses and Level 10 would feature restaurant/hospitality/entertainment uses and office uses. The roof would house the building's mechanical equipment and tenant terrace. As discussed further below, Levels 2, 4, 5, 8, 9, 10, and the roof would include tenant terraces.

As shown in Figure 4 on page 14, Option B would retain the existing 2,551 square-foot ground level building currently occupied with a restaurant use. New commercial, retail, restaurant, lobby, and parking uses would also be located on the ground level. Levels 2 through 4 would include parking and additional office uses, built around the existing ground level building. Levels 5 through 9 would include office uses and Level 10 would feature restaurant/hospitality/entertainment uses and office uses. The roof would

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

Land Use	Floor Area—Option A	Floor Area—Option B
Office	136,200 sf	134,100 sf
Restaurant ^b	12,200 sf	14,300 sf
Retail	2,200 sf	2,200 sf
Project Total	150,600 sf	150,600 sf
<hr/> <i>sf = square feet</i> ^a <i>Square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as “[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas.”</i> ^b <i>6,100 square feet may be used for entertainment uses.</i> <i>Source: Hawkins Brown, 2020.</i>		

house the building’s mechanical equipment and tenant terrace for the office use. As discussed further below, Levels 2, 4, 5, 8, 9, 10, and the roof would include terraces.

The design of the proposed mixed-use building would be similar under both options. Materials used for the development feature metal panels with projecting fins, glazed guard rails, metal profiles, and precast concrete elements. The building’s massing is comprised of three distinct volumes. Each volume is distinct and intended to respond to the height and scale of the surrounding buildings. The lower volume sits back from Seward Street creating a public plaza in front of the building. The plaza is enhanced by a new tiered auditorium stair, incorporating seating and planting. A distinct and legible entrance to the commercial office lobby is also located on Romaine Street. The middle volume sets back from both the residential properties to the north, as well as Hudson Avenue, to respect the adjacent building scale and sightlines from the neighboring properties. The volume projects over the newly formed public plaza to form a high-level canopy. The upper volume sets back further from Romaine Street and Hudson Avenue, to form a crown to the building. Furthermore, large planted terraces will be provided at multiple levels of the building.

3.3.3 Open Space and Landscaping

Both Project options would incorporate a variety of open space and amenities throughout the Project Site. The building would include terraces that would be located on multiple levels throughout the building and would feature outdoor dining seating, lounge seating, and landscaping. The Project would include tenant terraces on Levels 2, 4, 5, 8, 9, and the roof which would provide seating, lounge areas, and landscaping. Meanwhile Level 10 would include a restaurant/entertainment terrace. Additional common open space would be provided on the first floor of the building and would include walkways, outdoor dining seating, new trees, and raised planters. Under either option, the Project would provide approximately 34,550 square feet of open space (500 square feet of which would be a publicly accessible ground floor plaza. New trees would be provided along the building perimeter and landscaping would be provided on the tenant terraces.

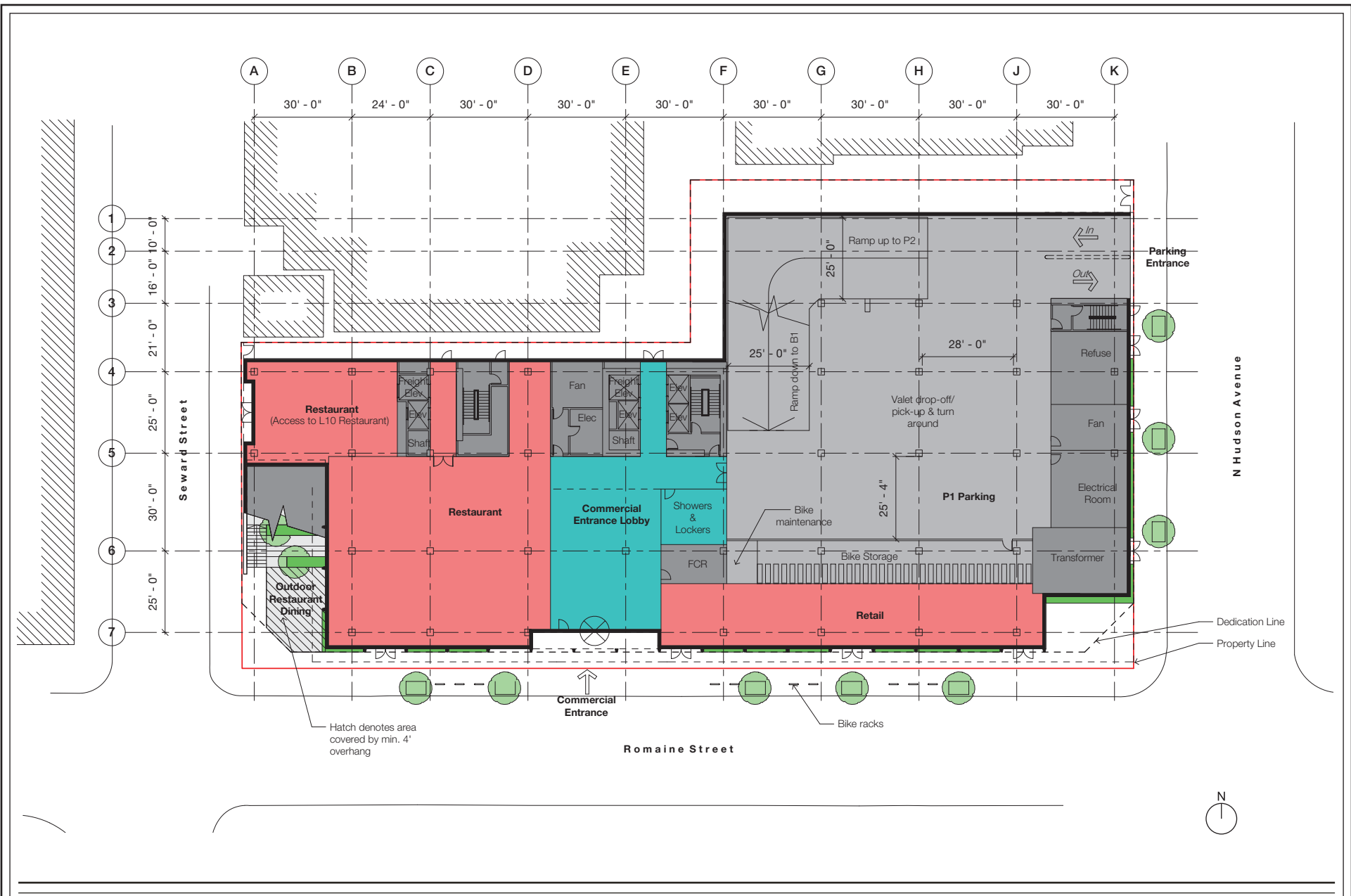


Figure 3
1st Floor Plan—Option A

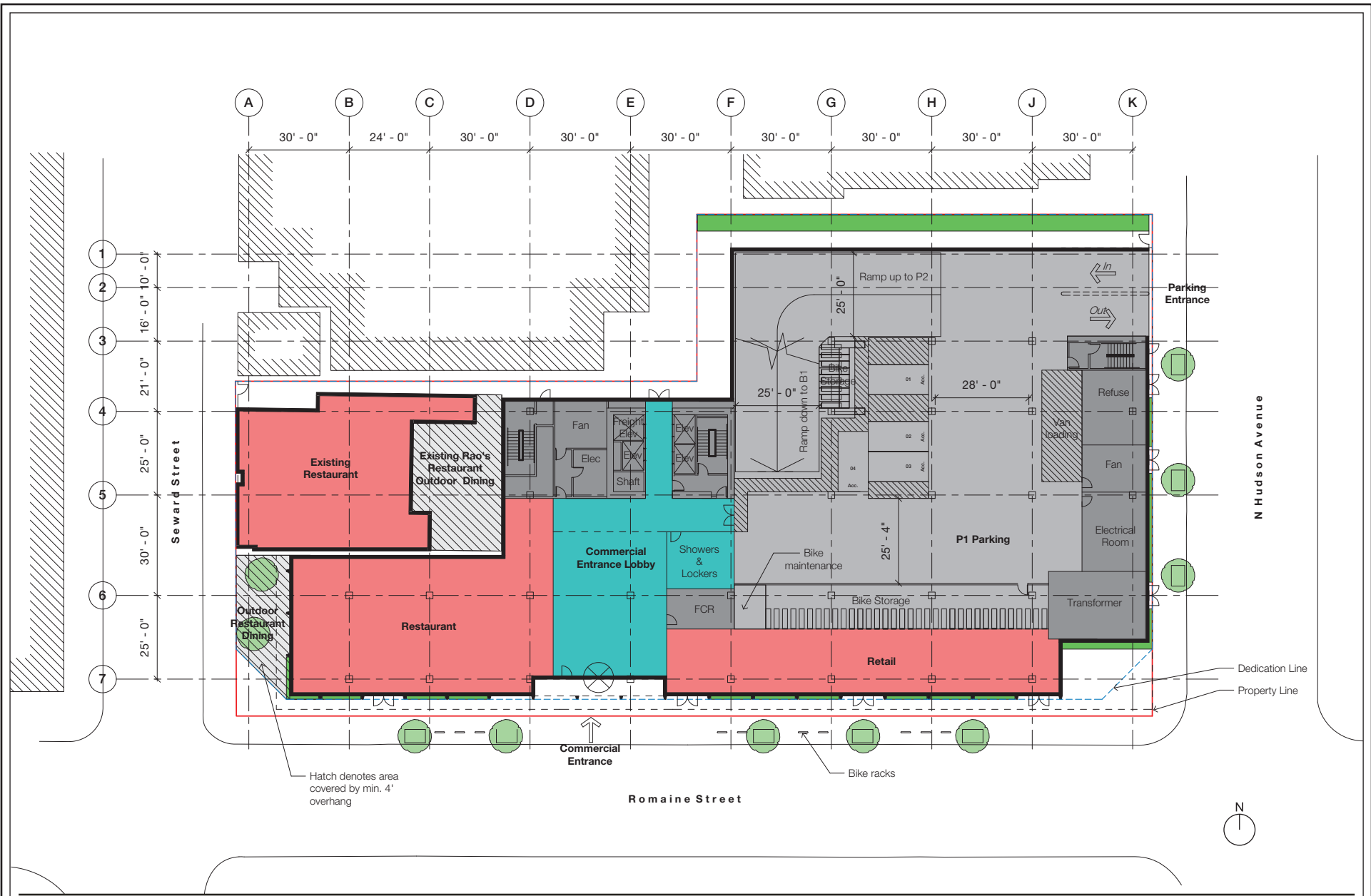


Figure 4
1st Floor Plan—Option B

3.3.4 Access, Circulation, and Parking

Vehicular access to the Project Site would be provided via a two-way driveway along Hudson Avenue that would provide access to the building's ground-level, above-grade, and subterranean parking. Primary pedestrian access to the building's commercial lobby would be provided along Romaine Street. Secondary pedestrian access will also be available along Seward Street, including access to the Level 10 restaurant.

The number and location of parking spaces would be the same under either option. As shown in Table 2 on page 16, based on LAMC requirements under Section 12.21 and Enterprise Zone/Employment and Economic Incentive Program Area for the proposed land uses, the Project would be required to provide a minimum of 301 vehicle parking spaces. The Project would provide 310 parking spaces. Also, the Project would provide 58 bicycle parking spaces (comprised of 36 long-term spaces and 22 short-term spaces). Parking would be provided within four subterranean levels, which would extend to a maximum depth of 45 feet, one at-grade level that would be enclosed with the exception of the entrance, and in three fully-enclosed and mechanically ventilated above grade parking levels. The Project would also comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking areas.

3.3.5 Lighting and Signage

Exterior lighting along the public areas would include pedestrian-scale lighting fixtures and elements. Low-lumen exterior lights would also be incorporated on the building and along pathways for security and wayfinding purposes as well as to accent signage, architectural features, and landscaping elements throughout the site. Project lighting would be shielded and directed on-site in order to minimize light trespass from the Project Site. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations, and would be approved by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties.

Project signage would be designed to be aesthetically compatible with the architecture of the Project and other signage in the area. Proposed signage would include mounted project identity signage, building and commercial tenant signage, and general ground-level and wayfinding pedestrian signage. Wayfinding signs would be located at parking garage entrances, elevator lobbies, vestibules, and residential corridors. No off-site advertising is proposed as part of the Project, and all signage would comply with the requirements of the LAMC.

Lighting and signage would be the same under either option.

3.3.6 Sustainability Features

Under either option, 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. These standards would reduce and conserve energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project include, but would not be limited to the following: photovoltaic cells; electric vehicle charging

**Table 2
Vehicular Parking**

Code Requirement^a	Spaces Required	Spaces Provided
2 spaces per 1,000 sf of commercial/restaurant use	$(150,600 \text{ sf} * 2) \div 1,000 = 301$	310
<hr/> <i>sf = square feet</i> ^a LAMC 12.21(A)(4)(x)(3); ZI 2374. <i>Source: Hawkins Brown, 2020.</i>		

stations; material recycling stations; highly efficient HVAC systems; energy-efficient wall insulation and glazing units; WaterSense-labeled plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star-labeled appliances; and water-efficient landscape design (i.e., grouping plants according to their water needs, and the use of native and low-water plants).

3.3.7 Anticipated Construction Schedule

Project approval is anticipated in 2021, with construction to begin thereafter, with completion by 2025. Construction of the Project would commence with demolition of the existing structures and surface parking, although under Option B, the existing 2,551 square-foot restaurant would be retained. This phase would be followed by grading and excavation for the subterranean parking. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. It is estimated that approximately 39,053 cubic yards of export would be hauled from the Project Site.

3.4 REQUESTED PERMITS AND APPROVALS

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

- Pursuant to LAMC Section 11.5.6, a General Plan Amendment to amend a portion of the Project Site designated by the Hollywood Community Plan as “Medium Residential” land use designation to a “Limited Manufacturing” land use designation to match the balance of the Project Site;
- Pursuant to LAMC Sections 12.32-F and 12.32-Q, a Vesting Zone Change for the Project Site from “R3” and “MR1” to “M1” to allow for the office use across the entire Project Site;
- Pursuant to LAMC Section 12.32-F, a Height District Change for the Project Site from Height District No. 1 to Height District No. 2 with a D Limitation to allow a 4.5:1 FAR;

- Pursuant to LAMC Section 12.24-W.1, a Conditional Use Permit to allow the sale or dispensing for consideration of alcoholic beverages, including beer, wine, and a full-line of alcohol, for consumption on the premises or off-site of the premises in the M1 Zone (for up to three suites);
- Pursuant to LAMC Section 12.24-U.14, a Conditional Use Permit for a Major Development Project for the construction of 100,000 square feet or more of non-residential or non-warehouse uses in the M1 zone;
- Pursuant to LAMC Section 12.37, a Waiver of Dedication for the dedications and improvements along Seward Street and Romaine street; and,
- Pursuant to LAMC Section 16.05, a Site Plan Review for development that creates, or results in an increase of 50,000 gross square feet or more nonresidential floor area.
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, haul route application, 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). The list below identifies whether any responsible agencies have been identified for the Project.

- South Coast Air Quality Management District (SCAQMD)

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) §21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” PRC Section 21099 defines a “transit priority area” as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21099 defines an “employment center project” as “a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099 defines an “infill site” as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

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

Although the Project Site is designated as a TPA in ZIMAS based on the identification of a major transit stop on Santa Monica Boulevard on City maps, and although the Project qualifies as an employment center project under PRC Section 21099, a review of bus headways at nearby bus stops indicates they are not frequent enough for the Project Site to be designated as a TPA. Therefore, an analysis of aesthetics impacts is provided below.

⁵ City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2452, Transit Priority Areas (TPAs)/ Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA, <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>, accessed April 20, 2020.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Except as provided in Public Resources Code Section 21099, would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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

Less Than Significant. A scenic vista is a panoramic view of a valued visual resource. Based on the City’s 2006 L.A. CEQA Thresholds Guide, panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. According to the L.A. CEQA Thresholds Guide, panoramic views are typically associated with vantage points looking out over a section 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.

As discussed in Section 3, Project Description, of this Initial Study, the Project Site is located in the highly urbanized Hollywood Community Plan area of the City. Land uses located adjacent to the Project Site include an approximately 64-foot-tall parking structure to the north; a 76-foot-tall office building, multi-family residential buildings, and an above-grade parking structure to the west; a 76-foot-tall office/commercial building and industrial uses to the south; and multi-family residential buildings to the east. Due to the highly urbanized and built out surroundings, publicly available scenic vistas of any valued visual resources that may exist in the vicinity of the Project Site, including views of the Hollywood Hills would continue to be provided from surrounding streets.

Panoramic views that include the Project Site are available from a variety of vantage points in the Hollywood Hills to the north. As is the case under existing conditions, future views with implementation of the Project would continue to depict a highly urbanized area stretching from Hollywood to downtown Los Angeles and beyond. The building would be a maximum height of 151 feet; despite the increase in building height and density, the Project Site would remain difficult to discern within the greater fabric of the

urban development. In terms of long range views, the Project would not interfere with current public views of the downtown skyline and distant horizon line that is available from the public rights-of-way.

Therefore, development of the Project would not have the potential to substantially or adversely affect a scenic vista. Impacts would be less than significant, and no mitigation measures are required. Therefore, no evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is not located along a state scenic highway. The nearest eligible state scenic highway is Interstate 210 (I-210) between Interstate 5 and State Route 134, located approximately 11 miles northeast of the Project Site and the nearest designated state scenic highway is State Route 2 (SR-2) north of Interstate 210, which is located approximately 12 miles northeast of the Project Site.⁶ Thus, the Project would not substantially damage scenic resources within a designated scenic highway as there are no scenic highways along the Project Site. Therefore, no evaluation of this topic in an EIR is required

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

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

The existing Hollywood Community Plan land use designations for the Project Site are Limited Manufacturing and Medium Residential. In accordance with the Los Angeles Municipal Code (LAMC), the Project is zoned MR1-1 (Restricted Industrial, Height District 1) and R3-1 (Multiple Dwelling, Height District 1). The MR1 Zone permits CM (commercial manufacturing) uses, including commercial and manufacturing, clinics, media production, certain office, retail, and restaurant uses, limited machine shops, animal hospitals, and kennels. The R3 Zone permits R2 (two-family dwellings) uses, including apartment houses, multiple dwellings, and child care (20 children maximum) uses. The Height District 1 designation, in conjunction with the R3 Zone has a height limit of 45 feet and an FAR of 3:1. The Height District 1 designation for the MR1 Zone permits an FAR of 1.5:1, but does not impose a maximum building height limit.

As described in Section 3, Project Description, of this Initial Study, the Project would develop new office, restaurant, and retail uses totaling 150,600 square feet in one of two development options. Under Option A, the Project would demolish both existing buildings on the Project Site and develop 136,200 square feet of office uses, 12,200 square feet of restaurant uses (of which 6,100 square feet may be used for an entertainment use), and 2,200 square feet of retail uses. Under Option B, the existing 8,442 square-foot

⁶ Caltrans, List of Designated and Eligible State Scenic Highways, August 2019.

studio and production space would be demolished, but the 2,551 square-foot restaurant would be retained, and the Project would develop 134,100 square feet of office uses, 14,300 square feet of restaurant uses (of which 6,100 square feet may be used for an entertainment use), and 2,200 square feet of retail uses. The Project also proposes a General Plan Amendment to the Hollywood Community Plan to amend a portion of the Project Site designated as Medium Residential to Limited Manufacturing to match the balance of the site; a Vesting Zone Change from R3 and MR1 to M1 to allow for office uses across the entire Project Site; and a Height District Change from Height District No. 1 to Height District No. 2 with a D Limitation to allow a 4.5:1 FAR. Upon approval of the requested entitlements, the proposed uses would be consistent with the uses permitted under the new zoning.

With regard to the City's regulations governing scenic quality, local land use plans applicable to the Project Site also include policies governing scenic quality, including the Citywide General Plan Framework Element and the Citywide Design Guidelines.⁷ The Project's consistency with the general intent of these plans is briefly discussed below. In addition, although the Hollywood Community Plan does not include specific policies governing scenic quality, the Project's consistency with the recommended actions in the Community Plan is also discussed below.

Citywide General Plan Framework

The City of Los Angeles General Plan Framework Element provides direction regarding the City's vision for future development in the City and includes an Urban Form and Neighborhood Design chapter to guide the design of future development. One of the key objectives of the Urban Form and Neighborhood Design Chapter is to enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm (Objective 5.5). The Project would enhance the built environment in the surrounding neighborhood and upgrade the quality of development by replacing buildings and providing new landscaping throughout the Project Site. The Project also would provide approximately 34,550 square feet of open space within the Project Site. Under both development options, the building would include terraces that would be located on multiple levels throughout the building and would feature outdoor dining seating (on Level 10), lounge seating, and landscaping.

Citywide Design Guidelines

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

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

The Project's design elevates the pedestrian experience in and around the Project. The ground floor of the building would feature a retail space and restaurant uses which open fully onto the street. The lobby is open to Romaine Street. The Project would include new landscaping along the sidewalks adjacent to the Project Site, further activating the streetscape and improving the pedestrian environment.

⁷ The Hollywood Community Plan does not include specific policies governing scenic quality.

In addition, the Project would include low-level exterior lights adjacent to the buildings and along pathways that would serve to enhance the safety of pedestrians at night. These Project elements would promote a safe, comfortable, and accessible pedestrian experience for all.

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

The Project minimizes the appearance of parking entries and loading by integrating access into the overall design. The sole driveway to the parking structure is located on Hudson Avenue and the loading space is located inside the parking garage. These were located so as to minimize conflict with other modes of travel. All of the parking areas are to be located within the parking structure, which is fully enclosed and mechanically ventilated. In addition, as previously described, the Project includes new landscaping along the Project Site perimeter to enhance the pedestrian experience.

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

As noted above, the Project's design elevates the pedestrian experience in and around the Project Site by providing retail and restaurant uses, which are fully open onto the street, and new landscaping. In addition, the design of the ground floor articulation around the Project Site is pedestrian-oriented. The various ground floor uses are located along the street frontage to activate the streetscape and welcome pedestrians. The remainder of the ground floor would include open space and landscaped features that would activate the streetscape and be welcoming to passersby. The high quality design and landscaped edges would create a pleasant streetscape experience and reduce visual clutter.

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

The Project is designed to be a welcoming, sophisticated, and authentic addition to the neighborhood as well as a new, iconic presence for the Hollywood Media District. The Project's simple palette of materials including concrete, metal, and glass, the industrial details, and the massing volumes of the Project directly link the design to buildings found throughout the district. The ground floor retail and passage reinforce the vibrancy of immediate context.

Guideline 5: Express a clear and coherent architectural idea

The Project incorporates strong urban principles to define and enhance its location within Hollywood. The architecture includes bold yet sympathetic massing techniques to ensure a contextual and contemporary addition to the Project Site. Each major step in building mass offers opportunities to incorporate large, planted terraces at multiple levels, reinforcing the legibility of the building form and providing visual amenity from street level:

The lower volume, consisting of floors one through four, sits back from Seward Street to create a generous publicly accessible plaza in front of the building, improving the pedestrian experience at the ground level. The plaza is enhanced by a tiered auditorium stair, incorporating seating and planting that offers a place for the public to enjoy. The program at the ground level includes a restaurant at the corner of Seward and Romaine Streets that will further activate this plaza during the day and night. Additional

retail outlets are located along the Romaine Street frontage to offer smaller units for local and neighborhood businesses.

The middle volume, consisting of floors five through seven, sets back from the residential properties to the north and Hudson Avenue to respect adjacent building scale and sightlines from the neighboring properties. As a counterpoint, the volume projects over the public plaza to form a high-level canopy that addresses the street and defines this prominent urban corner.

The upper volume, consisting of floors eight through ten, sets back further from Romaine Street and Hudson Avenue to form a crown to the building. A restaurant on the top floor will further activate the corner of Seward and Romaine to ensure the public can benefit from the elevated experience that his building will offer and take advantage of commanding views across the City.

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

The Project's terraces help support the City's intent to increase the area and quality of open spaces in this park-scarce urban area of Los Angeles. The Project includes many design elements that would improve the public environment and also extend its plaza and paseos as quasi-public space that would also contribute to a more comfortable, safe, and pleasant pedestrian atmosphere. The plaza is an oasis and a destination in a historically industrial area with limited open or green space.

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

The Project would develop one commercial building that would include office, retail, and restaurant uses. The building and arrangement of uses would enhance pedestrian activity around the Project Site, as detailed above. The Project would also include lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into the building.

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

The Project Site is located in an urbanized area and is currently developed with a restaurant, studio and production space, and surface parking. There are no natural resources or features on the Project Site. As discussed further below, there is one Hollywood juniper located on the Project Site that would be removed as part of the Project. The Hollywood juniper is not protected under the City's Protected Tree Ordinance. There are also giant birds of paradise adjacent to the buildings along Seward Street and Romaine Street that would be removed as part of the Project, but these do not meet the definition of a tree.⁸ In addition, there are no City right-of-way trees adjacent to the Project Site. In accordance with the Department of City Planning's policy, the on-site tree to be removed would be replaced on a 1:1 basis.

⁸ The arboricultural industry's Best Management Practices define a tree as "a woody perennial plant with single or multiple trunks, which typically develops a mature size of over several inches in diameter, has a raised canopy, and is 10 feet or more in height." Conversely, a shrub is a smaller, usually multi-stemmed, and has a low canopy. Refer to the Tree Survey included as Appendix IS-1 of this Initial Study.

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

The building's east-west orientation is optimal for minimizing heat gain and the cantilevering elements provide shading to the glazing below. Floor to ceiling glazing maximizes natural light and views out while high performance glazing will be used to reduce solar heat gain.

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

As discussed further below, consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of an infiltration system, capture and use system, biofiltration/bioretention system, or a combination of these as required by the City's LID Manual.

Hollywood Community Plan

As noted above, the Hollywood Community Plan does not include specific policies governing scenic quality. However, the Hollywood Community Plan includes a recommendation that new power lines should be placed underground. The Project does not propose new overhead connections to power lines.

Conclusion

Based on the above, the Project would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, no evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The existing ambient nighttime lighting environment within the Project Site and vicinity is typical of a developed, urban environment where the primary nighttime lighting sources include interior light spillage from buildings, vehicle headlights along roadways and in parking areas, signage, street lamps, and security/parking lighting. Glare sources within the Project Site and vicinity include glass and metal, vehicle and building surfaces. The Project would introduce new sources of light and glare that are typically associated with commercial uses, including architectural lighting, signage lighting, interior lighting, and security and wayfinding lighting. Construction of the Project also has the potential to generate light and glare. The surrounding properties are generally multi-family residences, offices, and commercial buildings with views of the Project Site. The topography of the surrounding adjacent areas varies, providing different viewing aspects to the Project Site. Provided below is an analysis of the Project's potential impacts related to light and glare during construction and operation.

Construction

The Project's construction hours would comply with the LAMC, which provides that construction activities be limited to the hours of 7:00 A.M. to 9:00 P.M. Monday to Friday and 8:00 A.M. to 6:00 P.M. on Saturday. Pursuant to the LAMC, no construction activities are permitted on Sundays. Given the nature of the construction labor force (with a typical eight-hour workday beginning at 7:00 A.M.), the majority of Project construction would occur during daylight hours. However, there is a potential that construction activities

could require the limited use of artificial lighting during the winter season when daylight may not be sufficient earlier in the day. Outdoor lighting sources such as floodlights, spot lights, and/or headlights associated with construction equipment and hauling trucks typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of Project construction. Further, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. In addition, construction lighting, while potentially bright, would be highly focused on the particular area undergoing work. Thus, with adherence to existing LAMC regulations, construction of the Project would not create a new source of substantial light which would adversely affect day or nighttime views in the area. Therefore, light impacts associated with Project construction would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Daytime glare could potentially accompany construction activities if reflective construction materials were positioned in highly visible locations where glare conditions (e.g., orientation and presence of glare-sensitive uses) could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities within each area of the Project Site. In addition, large surfaces that are usually required to generate substantial glare are typically not an element of construction activities. Furthermore, construction activities would be screened by temporary fencing and surrounding perimeter landscaping. As such, construction of the Project would not create a new source of substantial glare which would adversely affect day or nighttime views in the area. Therefore, glare impacts associated with Project construction would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

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

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

elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas, or any other property containing a residential unit or units.

With regard to glare, daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. Sun reflection can also occur with reflected light from parked vehicles. In general, building materials would include smooth troweled stucco, composite metal wall panels with wood finish, limestone panels and glass. Metal surfaces would be used as accent materials and not cover expansive spaces. The Project would use non-reflective glass or glass that would be treated with a non-reflective coating in all exterior windows and building surfaces. In addition, all parking would be provided in a fully enclosed parking garage. As such, there would be limited potential from glare associated with parked vehicles.

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

II. AGRICULTURE AND FOREST RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with a restaurant, studio and production space, and surface parking. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site and surrounding area are also not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.⁹ As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is zoned as MR1-1 and R3-1. Pursuant to the LAMC, the MR1 Zone permits CM (commercial manufacturing) uses, limited commercial and manufacturing, clinics, media production, certain office, retail, and restaurant uses, limited machine shops, animal hospitals, and kennels. The R3 Zone permits R2 (two-family dwellings) uses, apartment houses, multiple dwellings, and child care (20 children maximum) uses. The Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area. The Project Site and surrounding area are also not enrolled under a Williamson Act Contract.¹⁰ Therefore, the Project would not conflict with any zoning for

⁹ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5533012025, 5533012013, 5533012012, and 5533012011, <http://zimas.lacity.org/>, accessed April 13, 2020.

¹⁰ California Department of Conservation, The Williamson Act Status Report 2016–17, www.conservation.ca.gov/dlrp/wa/Documents/stats_reports/2018%20WA%20Status%20Report.pdf, accessed April 13, 2020.

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

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

No Impact. As previously discussed, the Project Site is located in an urbanized area and is currently developed with a restaurant, studio and production space, and surface parking. The Project Site does not include any forest land or timberland. In addition, as discussed above, the Project Site is currently zoned for limited manufacturing and medium residential uses and is not zoned for forest land and is not used as forest land.¹¹ Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the PRC. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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

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

No Impact. As discussed above, the Project Site is located in an urbanized area of the City of Los Angeles and does not include farmland or forest land. The Project Site and surrounding area are also not mapped as farmland or forest land, are not zoned for farmland/agricultural use or forest land, and do not contain any agricultural or forest uses.¹² As such, the Project would not result in the conversion of farmland to non-agricultural use or in the conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

III. AIR QUALITY

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

¹¹ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5533012025, 5533012013, 5533012012, and 5533012011, <http://zimas.lacity.org/>, accessed April 13, 2020.

¹² City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5533012025, 5533012013, 5533012012, and 5533012011, <http://zimas.lacity.org/>, accessed April 13, 2020.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- | | | | | |
|---|-------------------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Conflict with or obstruct implementation of the applicable air quality plan? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Expose sensitive receptors to substantial pollutant concentrations? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [PM_{2.5}], and lead¹³). SCAQMD’s 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.¹⁴ With regard to future growth, SCAG has prepared the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2016–2040 RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG’s planning area. Construction and operation of the Project would result in an increase in stationary and mobile source air emissions. As a result, development of the Project could have a potential adverse effect on SCAQMD’s implementation of the AQMP. Therefore, the EIR will provide further analysis of the Project’s consistency with SCAQMD’s AQMP.

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

¹³ Partial Nonattainment designation for lead for the Los Angeles County portion of the Basin only.

¹⁴ SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.

Potentially Significant Impact. As discussed above, construction and operation of the Project would result in the emission of air pollutants in the Basin, which is currently in non-attainment of federal air quality standards for ozone, PM_{2.5} and lead, and, additionally, state air quality standards for ozone, particulate matter less than 10 microns in size (PM₁₀), and PM_{2.5}. Therefore, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Basin. The EIR will provide further analysis of cumulative air pollutant emissions associated with the Project.

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

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

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

Less Than Significant Impact. No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve the operation of uses typically associated with odor complaints. On-site trash receptacles would also be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

In addition, the construction and operation of the Project would comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.¹⁵ In particular, Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.¹⁶

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

¹⁵ SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed April 13, 2020.

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

IV. BIOLOGICAL RESOURCES

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

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

Less Than Significant Impact. The Project Site is located in an urbanized area and is currently developed with a restaurant, studio and production space, and surface parking. Landscaping within the Project Site is limited to one ornamental tree, and common grasses and shrubs. 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)¹⁷ or by the U.S. Fish and Wildlife Service (USFWS)¹⁸ 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.¹⁹ Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW or USFWS. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

No Impact. The Project Site is located in an urbanized area and is currently developed with a restaurant, studio and production space, and surface parking. No riparian or other sensitive natural community exists on the Project Site or in the surrounding area.^{20,21} 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.^{22,23} In addition, there are no other sensitive natural communities identified by the CDFW or the USFWS.^{24,25,26} Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required

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

No Impact. As discussed above, the Project Site is located in an urbanized area and is currently developed with a restaurant, studio and production space, and surface parking. No water bodies or state

¹⁷ California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, August 2019.

¹⁸ United States Fish and Wildlife Service, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, <https://ecos.fws.gov/ecp0/reports/ad-hoc-species-report>, accessed April 13, 2020.

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

²⁰ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5533012025, 5533012013, 5533012012, and 5533012011, <http://zimas.lacity.org/>, accessed April 13, 2020.

²¹ United States Environmental Protection Agency, NEPAAssist, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, accessed April 13, 2020.

²² City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

²³ Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

²⁴ California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), <https://map.dfg.ca.gov/bios/>, accessed April 13, 2020.

²⁵ California Department of Fish and Wildlife, CDFW Lands, <https://map.dfg.ca.gov/lands/>, accessed April 13, 2020.

²⁶ United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed April 13, 2020.

and federally protected wetlands exist on the Project Site.²⁷ In addition, construction of the Project would not result in the removal, filling, or other means of hydrological interruption. As such, the Project would not have an adverse effect on state or federally protected wetlands. No impact would occur, and no mitigation measures are required. Therefore, 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 restaurant, studio and production space, and surface parking. In addition, the areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within and surrounding the Project Site that provide linkages to natural open spaces areas which may serve as wildlife corridors. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.^{28, 29}

According to the Tree Survey prepared for the Project dated May 2020, and included in Appendix IS-1 of this Initial Study, there is one non-protected tree on the Project Site which would be removed during construction of the Project. This tree could potentially provide nesting sites for migratory birds. There are also giant birds of paradise adjacent to the buildings along Seward Street and Romaine Street, but these do not meet the definition of a tree.³⁰ The Project would comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, of any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish & Game Code Section 3503 (Section 3503) states that “[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.” No exceptions are provided in the code and the CDFW has not promulgated regulations interpreting these provisions. To ensure regulatory compliance with the Migratory Bird Treaty Act and California Fish and Game Code, the Project would require that tree removal activities would take place outside of the nesting season (February 1–August 31), to the extent feasible. In addition, should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. Therefore, with compliance with the Migratory Bird Treaty Act, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of

²⁷ United States Environmental Protection Agency, NEPAAssist, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, accessed April 13, 2020.

²⁸ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, p. 2-18-4.

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

³⁰ The arboricultural industry’s Best Management Practices define a tree as “a woody perennial plant with single or multiple trunks, which typically develops a mature size of over several inches in diameter, has a raised canopy, and is 10 feet or more in height.” Conversely, a shrub is a smaller, usually multi-stemmed, and has a low canopy. Refer to the Tree Survey included as Appendix IS-1 of this Initial Study.

native wildlife nursery sites. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least 4 inches in diameter at breast height. These tree species are defined as “protected” by the City of Los Angeles. Trees that have been planted as part of a tree planting program are exempt from the City’s Protected Tree Ordinance and are not considered protected. The City’s Protected Tree Ordinance prohibits, without a permit, the removal of any regulated protected tree, including “acts which inflict damage upon root systems or other parts of the tree [...]” and requires that all regulated protected trees that are removed be replaced on at least a 2:1 basis with trees that are of a protected variety.

According to the Tree Survey prepared for the Project dated May 2020, and included in Appendix IS-1 of this Initial Study, there is one Hollywood juniper located on the Project Site that would be removed as part of the Project. The Hollywood juniper is not protected under the City’s Protected Tree Ordinance. There are also giant birds of paradise adjacent to the buildings along Seward Street and Romaine Street that would be removed as part of the Project, but these do not meet the definition of a tree.³¹ In addition, there are no City right-of-way trees adjacent to the Project Site. In accordance with the Department of City Planning’s policy, the on-site tree to be removed would be replaced on a 1:1 basis. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As described above, the Project Site is located in an urbanized area and is currently developed with a restaurant, studio and production space, as well as surface parking. As also previously discussed, landscaping within the Project Site is limited, consisting of one ornamental tree and shrubs and the Project Site does not support any habitat or natural community^{32,33} No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.³⁴ Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural

³¹ The arboricultural industry’s Best Management Practices define a tree as “a woody perennial plant with single or multiple trunks, which typically develops a mature size of over several inches in diameter, has a raised canopy, and is 10 feet or more in height.” Conversely, a shrub is a smaller, usually multi-stemmed, and has a low canopy. Refer to the Tree Survey included as Appendix IS-1 of this Initial Study.

³² City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5533012025, 5533012013, 5533012012, and 5533012011, <http://zimas.lacity.org/>, accessed April 13, 2020.

³³ United States Environmental Protection Agency, NEPAassist, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, accessed April 13, 2020.

³⁴ California Department of Fish and Wildlife, California Natural Community Conservation Plans, April 2019.

community conservation plan, or other related plans. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

V. CULTURAL RESOURCES

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

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

Potentially Significant Impact. CEQA Guidelines Section 15064.5 generally defines a historical resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to PRC Section 5020.1(k)); or (3) identified as significant in a historical resources survey (meeting the criteria in PRC Section 5024.1(g)). Additionally, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register. The local register of historical resources is managed by the Los Angeles Office of Historic Resources, which established SurveyLA, a comprehensive program to identify potentially significant historic resources throughout the City. The existing restaurant on the Project Site, located at 1006 Seward Street, was identified as a potentially historic resource by HistoricPlacesLA due to its significant relationship to the entertainment industry as the Hollywood Canteen.³⁵ As such, the EIR will include an analysis of potential direct and indirect impacts to historical resources.

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

³⁵ Los Angeles Historic Resources Inventory, www.historicplacesla.org/reports/3da61299-ab3d-4686-91113-c73e7e85abc9, accessed April 13, 2020.

Less Than Significant Impact. CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within an urbanized area of the City of Los Angeles and has been subject to grading and development in the past. Therefore, surficial archaeological resources that may have existed at one time have likely been previously disturbed. Furthermore, confidential South Central Coast Information Center (SCCIC) records indicate that 34 previously recorded cultural resources have been mapped within 0.5 mile of the Project Site. However, none of these resources are within the Project Site. No prehistoric archeological resources have been recorded within 0.5 mile of the Project Site. Nevertheless, the Project would require grading, excavation, and other construction activities to a depth of 45 feet that could have the potential to disturb existing but undiscovered archaeological resources. Thus, the Project could have the potential to disturb previously undiscovered archaeological resources.

However, the City has established a standard condition of approval to address inadvertent discovery of archaeological resources. Should archeological resources be inadvertently encountered, this condition of approval provides for temporary halting construction activities near the encounter so the find can be evaluated. An archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist’s recommendations have been implemented to the satisfaction of the archaeologist. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements.

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

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

Less Than Significant Impact. As discussed above, the Project Site is located within an urbanized area and has been subject to previous grading and development. Therefore, the potential for uncovering human remains on the Project Site is low. Nevertheless, the Project would require grading, excavation, and other construction activities that could have the potential to disturb existing but undiscovered human remains. If human remains were discovered during construction of the Project, work in the immediate vicinity of the construction area would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determined the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the person or persons it believes to be most likely descended from the deceased Native American. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98.

Therefore, due to the low potential that any human remains are located on the Project Site, and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, the Project’s impact related to human remains would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

VI. ENERGY

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

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

Potentially Significant Impact. As discussed above, the Project would include the development of a 150,600-square-foot mixed-use building which will include office, retail, and restaurant uses. Due to the increased floor area and type of uses, the Project would generate an increased demand for electricity and natural gas services provided by the Los Angeles Department of Water and Power (LADWP) and the Southern California Gas Company, respectively. While development of the Project would not be anticipated to cause wasteful, inefficient, and unnecessary consumption of energy resources, further analysis of the Project’s demand on existing energy resources will be provided in the EIR.

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

Potentially Significant Impact. First established in 2002 under Senate Bill (SB) 1078, California’s Renewable Portfolio Standard required retail sellers of electric services to increase procurement from eligible renewable energy resources to 20 percent of total retail sales by 2017.³⁶ The program was accelerated in 2015 with SB 350 which mandated a 50 percent Renewable Portfolio Standard (RPS) by 2030. In 2018, SB 100 was signed into law, which again increases the RPS to 60 percent by 2030 and requires all the state’s electricity to come from carbon free resources by 2045. LADWP provides electrical service throughout the City and many areas of the Owens Valley. LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources,

³⁶ CPUC, California Renewables Portfolio Standard (RPS), www.cpuc.ca.gov/rps/, accessed April 13, 2020.

such as wind, solar, and geothermal sources. In accordance with SB 100, LADWP is required to procure at least 60 percent of its energy portfolio from renewable sources by 2030

Regarding energy efficiency, the California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction, system design, and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2019 Title 24 standards, which became effective on January 1, 2020.³⁷ The 2019 Title 24 standards include efficiency improvements to the residential standards for attics, walls, water heating, and lighting and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1 2017 national standards.³⁸

As previously described, the Project would include the development of a 150,600-square-foot mixed-use building, which will include office, retail, and restaurant uses. The Project Site does not include any renewable energy sources used by LADWP. The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. While the Project would not be anticipated to conflict with or obstruct a state or local plan for renewable energy or energy efficiency, the Project’s compliance with LADWP’s plans for renewable energy as well as the Project’s compliance with California Building Energy Efficiency Standards will be further evaluated in the EIR.

VII. GEOLOGY AND SOILS

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

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

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

³⁷ CEC, 2019 Building Energy Efficiency Standards, www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency/, accessed April 13, 2020.

³⁸ 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
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The following analysis is based in part on the Geotechnical Investigation prepared for the Project by Geocon West, Inc., dated January 7, 2020 and revised April 29, 2020. All specific information on geologic and soils conditions in the discussion below is from this report unless otherwise noted. This report is included as Appendix IS-2 of this Initial Study.

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

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

Less Than Significant Impact. Surface fault rupture occurs when movement on a fault breaks through to the earth's surface.³⁹ Based on criteria established by the California Geological Survey, faults can be classified as active, potentially active, or inactive. Active faults are faults that have historically produced earthquakes or shown evidence of movement within the past 11,000 years. Potentially active faults have demonstrated displacement within the last 1.6 million years. Inactive faults do not exhibit displacement younger than 1.6 million years before the present. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

³⁹ California Department of Conservation, Alquist-Priolo Earthquake Fault Zones, www.conservation.ca.gov/cgs/alquist-priolo, accessed April 15, 2020.

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

Based on a review of the Earthquake Fault Zones and Seismic Hazard Zones map prepared by the California Department of Conservation, the Project Site is not located within a fault zone.⁴⁰ According to the Geotechnical Investigation and ZIMAS, the closest active fault is the Hollywood Fault, located approximately 1.0 mile north from the Project Site. Additionally, based on the City of Los Angeles General Plan Safety Element, the Project Site is not located within an Alquist-Priolo Special Studies Zone.⁴¹ Furthermore, according to the Geotechnical Investigation, included in Appendix IS-2, of this Initial Study, based on research of available literature as well as results of site reconnaissance, no known active faults or potentially active faults with the potential for surface rupture underlie the Project Site. Therefore, the Geotechnical Investigation concluded the potential for surface ground rupture at the Project Site is considered low. The Project also would not involve mining operations that require deep excavations thousands of feet into the earth, or boring of large areas, which could create unstable seismic conditions or stresses in the Earth's crust. Further, the Project would not exacerbate existing fault rupture conditions and thus, the Project would not exacerbate existing environmental conditions by introducing people or structures into areas potentially susceptible to substantial adverse effects, including fault rupture. Accordingly, the Project would not directly or indirectly cause potential substantial adverse effects involving the rupture of a known earthquake fault. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located in the seismically active region of Southern California and would potentially be subject to strong seismic ground shaking if a moderate to strong earthquake occurs on a local or regional fault. As discussed above, no active faults are known to pass directly beneath the Project Site and the Project Site is not located in an Alquist-Priolo Earthquake Fault Zone. According to the Geotechnical Investigation and ZIMAS, the closest active fault is the Hollywood Fault located approximately 1.0 mile north from the Project Site. State and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. Specifically, the state and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the City's General Plan Safety Element, and the Los Angeles Building Code. Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions thereof before permits can be issued for construction of the Project. Accordingly, the design and construction of the Project would comply with all applicable existing regulatory requirements, the applicable provisions of the Los Angeles Building Code relating to seismic safety, and the application of accepted and proven construction engineering practices. The Los Angeles Building Code incorporates current seismic design provisions of

⁴⁰ California Department of Conservation, California Geological Survey. *Earthquake Fault Zones and Seismic Hazards Zones Map, Hollywood 7.5 Minute Quadrangle*, November 6, 2014.

⁴¹ Department of City Planning Los Angeles, Safety Element of the Los Angeles General Plan, Exhibit A—Alquist-Priolo Special Study Zones & Fault Rupture Study Areas in the City of Los Angeles, p. 47.

the 2019 California Building Code, with City amendments, to minimize seismic impacts. The 2019 California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of LADBS, including the recommendations provided in a final geotechnical report for the Project, which was reviewed and approved by LADBS on June 18, 2020.

The Project would not involve mining operations, deep excavations into the earth, or borings of large areas and thus would not exacerbate potential on-site seismic conditions.

Based on the above, through compliance with regulatory requirements and site-specific geotechnical recommendations, the Project would not directly or indirectly cause potential substantial adverse effects involving strong seismic ground shaking. Therefore, the Project's impact related to strong seismic ground shaking would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

iii. Seismic-related ground failure, including liquefaction?

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

According to the California Department of Conservation's Earthquake Fault Zones and Seismic Hazard Zones Map for the Hollywood Quadrangle, the Project Site is located not located within a liquefaction zone.⁴² This determination is based on groundwater depth records, soil type, and distance to a fault capable of producing a substantial earthquake. Additionally, the Safety Element of the Los Angeles City General Plan indicates the Project Site is not located within a liquefiable area (recent alluvial deposits; ground water less than 30 feet deep).⁴³ Furthermore, according to the Geotechnical Investigation, the potential for liquefaction and associated ground deformations beneath the Project Site is considered remote. Therefore, the Project would not exacerbate existing conditions related to liquefaction and with adherence to existing regulations and site-specific design recommendations, impacts related to liquefaction would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iv. Landslides?

⁴² California Department of Conservation, California Geological Survey. *Earthquake Fault Zones and Seismic Hazards Zones Map, Hollywood 7.5 Minute Quadrangle*, November 6, 2014.

⁴³ Department of City Planning Los Angeles, Safety Element of the Los Angeles General Plan, Exhibit B—Areas Susceptible to Liquefaction in the City of Los Angeles, p. 49.

No Impact. Landslides generally occur in loosely consolidated, wet soils and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and characterized by relatively level topography. According to the California Department of Conservation’s Seismic Hazard Zones Map for the Hollywood Quadrangle, the Project Site is not located within an earthquake-induced landslide area⁴⁴ and the Los Angeles General Plan Safety Element does not map the Project Site in a landslide area.⁴⁵ According to the Geotechnical Investigation, the probability of seismically-induced landslides occurring on the Project Site is considered to be low. Development of the Project also would not include altering the existing topography of the Project Site such that steep slopes would be introduced. Therefore, the Project would not exacerbate existing conditions that could result in the exposure of people and/or buildings to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. As such, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The Project Site is currently fully developed with buildings and surface parking areas. As such, there are no extensive open spaces with exposed topsoil. However, construction of the Project would require grading, excavation, and other construction activities that have the potential to disturb soils underneath the Project Site and expose these soils to rainfall and wind, which can result in soil erosion. This potential soil erosion would be reduced by the implementation of standard erosion controls during site preparation and grading activities. Specifically, all grading activities would require grading permits from 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 Chapter IX, Article 1 of the LAMC, which addresses grading, excavation, and fills. The Project would also be required to comply with the City’s Low Impact Development (LID) ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Regarding soil erosion during Project operations, the potential is negligible since the Project Site would be developed and landscaped, which would prevent soil erosion. Therefore, with compliance with applicable regulatory requirements, impacts related to substantial soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed above, the Project Site is not located in a landslide area as mapped by the state or by the City. Upon buildout of the Project, the existing topography of the Project Site would not be substantially altered. Specifically, the Project Site would remain relatively flat and would not cause landslides. As such, no impacts related to landslides would occur, and no mitigation measures related to landslides are required.

⁴⁴ California Department of Conservation, California Geological Survey. *Earthquake Fault Zones and Seismic Hazards Zones Map, Hollywood 7.5 Minute Quadrangle*, November 6, 2014.

⁴⁵ Department of City Planning Los Angeles, General Plan Safety Element, November 1996, Exhibit C, Landslide Inventory & Hillside Areas, p. 51.

Liquefaction-related effects include lateral spreading. The Project Site is not located in an identified liquefiable area and the potential for lateral spreading is considered remote. Nonetheless, Project design and construction would comply with all applicable requirements of the LADBS as well as site-specific design recommendations set forth in the Geotechnical Investigation. Therefore, with adherence to existing regulations and site-specific design recommendations, impacts related to lateral spreading would be less than significant, and no mitigation measures are required.

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the rapid and intensive withdrawal of subterranean fluids such as groundwater or oil. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring, or is planned at the Project Site. Therefore, there is no potential for ground subsidence due to withdrawal of fluid or gas at the Project Site. Thus, the Project's impact related to subsidence would be less than significant, and no mitigation measures are required.

As discussed above, the Project Site is not located within an area susceptible to liquefaction and the Geotechnical Investigation concluded that the potential for liquefaction and associated ground deformations beneath the Project Site is very low. As such, the Project's impact related to liquefaction would be less than significant, and no mitigation measures are required.

Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events.⁴⁶ According to the Geotechnical Investigation, the soils underlying the Project Site are not considered prone to soil instability. Therefore, the Project's impact related to collapse would be less than significant, and no mitigation measures are required.

Based on the above, the Project would not be located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. The Project would not exacerbate existing conditions with regard to geologic or soil stability. The impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

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

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. Due to high clay content, expansive soils expand with the addition of water and shrink when dried, which can cause damage to overlying structures. As discussed in the Geotechnical Investigation, the onsite geologic materials are in the low expansion range. Specifically, the Expansion Index was found to be between 21 and 50. Project design and construction would comply with all applicable requirements of LADBS for a site with underlying expansive soils as well as site-specific design recommendations set forth in the Geotechnical Investigation. Therefore, the Project would not exacerbate existing environmental conditions related to expansive soils and with adherence to existing regulations and site-specific design

⁴⁶ International Journal of Technical Innovation in Modern Engineering & Science (IJTIMES). Foundations on Collapsible and Expansive Soils: An Overview, http://ijtimes.com/papers/finished_papers/150410131426.pdf, accessed April 16, 2020.

recommendations, impacts related to expansive soils would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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

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

Less Than Significant Impact. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms since the majority of species that have existed on earth from this era are extinct. PRC Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Furthermore, California Penal Code Section 622.5 includes penalties for damage or removal of paleontological resources.

The Project Site is located within an urbanized area and has been subject to repeated grading and development in the past. Thus, surficial paleontological resources that may have existed at one time have likely been previously disturbed. In addition, a paleontological records search conducted by the Natural History Museum for the Project Site included in Appendix IS-3 of this Initial Study indicates there are no previously encountered fossil vertebrate finds located within the Project Site. However, according to the records search, vertebrate fossil localities have been discovered nearby from the same sedimentary deposits that occur on the Project Site. Surface deposits throughout the Project Site consist of soil on top of older Quaternary Alluvium, derived as alluvial fan deposits from the Hollywood Hills immediately to the north. The uppermost layers of these deposits in this vicinity typically do not contain significant fossil vertebrate remains. There are, however, four vertebrate fossil localities collected from these late Pleistocene deposits at depths between 47 and 80 feet below ground surface along Hollywood Boulevard between the Hollywood Freeway and Western Avenue during excavations for the Metro B (Red) Line tunnels and stations. Fossil specimens of horse, bison, camel, and mastodon were recovered from these localities.

Further afield, especially to the south-southwest near the Rancho La Brea asphalt deposits in the Hancock Park region, fossil vertebrates have been recovered at shallower depths. A fossil mastodon was discovered 5-6 feet below ground surface near the intersection of Western Avenue and Council Street, approximately 1.7 miles southeast of the Project Site. A fossil mammoth was discovered at a depth of 8 feet near the intersection of Madison Avenue and Middlebury Street, approximately 2.6 miles southeast of the Project Site and a fossil bison was discovered at a depth of 12 feet below ground surface near the intersection of Sierra Bonita Avenue and Oakwood Avenue, approximately 1.4 miles southwest of the Project Site.

Very shallow excavations in the older Quaternary Alluvium underlying the Project Site are unlikely to uncover significant vertebrate deposits. However, the Project would include excavations up to a maximum depth of 45 feet. Thus, the possibility exists that paleontological artifacts that were not discovered during prior construction or other human activity may be present.

However, the City has established a standard condition of approval to address inadvertent discovery of paleontological resources. Should paleontological resources be inadvertently encountered, this condition of approval provides for temporary halting construction activities near the encounter so the find can be evaluated. A paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum and the Department of City Planning. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements.

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

VIII. GREENHOUSE GAS EMISSIONS

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

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

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

may have a significant impact on the environment. Therefore, the EIR will provide further analysis of the Project's greenhouse gas emissions.

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

Potentially Significant Impact. As the Project would have the potential to emit greenhouse gases, the EIR will include further evaluation of project-related emissions and associated emission reduction strategies to determine whether the Project conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases (e.g., Assembly Bill [AB] 32 and the City of Los Angeles Green Building Code).

IX. HAZARDS AND HAZARDOUS MATERIALS

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The following analysis is based, in part, on the *Phase I Environmental Site Assessment Update Report* (Phase I ESA) prepared for the Project by EFI Global dated June 2, 2020. All specific information on historic and existing on-site conditions in the discussion below is based on the Phase I ESA unless otherwise noted. The Phase I ESA is included in Appendix IS-4 of this Initial Study.

The discussion of methane gas is based on the *Hazardous Gas Assessment 1003-1013 Hudson, 6565 Romain [sic] & 1006 Seward (LOT 12-16 of White & Newby's Hollywood Tract) Los Angeles, CA* (Methane Report) prepared for the Project by Geoscience Analytical, Inc. in November 2019. The Methane Report is included as Appendix IS-5 of this Initial Study.

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

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

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in office and commercial uses, including cleaning products, paints, and those used for maintenance of landscaping. Such use would be consistent with that currently occurring

on the Project Site and other nearby developments. As a commercial office development, the Project would not involve the routine transport, use, and disposal of large quantities of hazardous materials. The Project's limited use of common hazardous materials can typically be disposed of at Class II or III landfills, which accept most common waste materials, such as those identified above. In addition, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with all applicable federal, state, and local requirements.

Based on the above, with compliance with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, the Project's impact associated with the routine transport, use, or disposal of hazardous materials during construction and operation of the Project would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The current and past land uses within the Project Site were identified as part of the Phase I ESA to assess their potential to present concerns relative to the presence of hazards and/or the handling of hazardous materials. These concerns are classified as Recognized Environmental Conditions (RECs), which are defined in Section 1.1.1 of the ASTM Standard Practice as the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, past release, or material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property.

As discussed in the Phase I ESA, based on available historical sources, the Project Site underwent separate courses of development. The Project Site consists of four contiguous parcels which are approximately 0.78 acres in total size. The earliest historical resource, a Sanborn map from 1919, indicated development of portions of the Project Site for residential use. The lack of historical data sources for the Project Site dating back to first developed uses represents historical data source failure. However, the Phase I ESA assumes that prior to 1919, the subject property would have been developed for residential uses, if not undeveloped. The northeast portion of the Project Site (1013 North Hudson Avenue) currently has a parking lot that was developed in 1985. The east portion of the Project Site (1007 North Hudson Avenue) currently has a parking lot that was developed in 1959. The southeast portion of the Project Site (1003 North Hudson Avenue; 6551-6561 Romaine Street) currently has a parking lot that was developed in 1986. The western half of the Project Site (1000 and 1006 Seward Street; 6565-6575 Romaine Street) was developed in 1937 with the existing restaurant (1006 Seward) and commercial building that houses the media production studio (1000 Seward). The existing, attached northeast structure (6565 Romaine) was developed in 1960 as a radio equipment repair shop. As concluded in the Phase I ESA, based on site observations, interviews, and review of available documents and database records search, no Historical Recognized Environmental Conditions (HRECs), RECs, or Controlled Recognized Environmental Conditions (CRECs) were identified in connection with the Project Site.

As part of the Phase I ESA, interviews and visual observations were completed at the Project Site to evaluate for the possible presence of abandoned in-place underground storage tanks (USTs) and above ground storage tanks (ASTs). The Phase I ESA also included an assessment of other hazardous

substances, including asbestos-containing materials (ACMs), lead-based paint (LBP), and polychlorinated biphenyls (PCBs). Provided below is a summary of the findings of the Phase I ESA.

Construction

Underground and Aboveground Storage Tanks

According to the Phase I ESA, no evidence of existing USTs or ASTs was observed on the Project Site. No other records were found that indicate the presence of USTs or ASTs within the areas proposed for construction. Notwithstanding, in the unlikely event that USTs are found, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. For example, if underground storage tanks are encountered, prior to removal, applicable permits would be obtained from the Los Angeles Fire Department (LAFD). Therefore, with compliance with applicable regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts related to the potential removal of USTs during construction would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Polychlorinated Biphenyls

Typical sources of PCBs include electrical transformer cooling oils, fluorescent light fixture ballasts, and hydraulic oil. In 1976, the United States Environmental Protection Agency (USEPA) banned the manufacture and sale of PCB-containing transformers. As detailed in the Phase I ESA, no pole or pad mounted transformers or PCB containing equipment were observed at the Project Site. However, in the event that PCBs are found within areas proposed for demolition, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. Therefore, with compliance with applicable regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts related to the removal of PCBs during demolition would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Asbestos-Containing Materials

Asbestos was widely used in the building industry starting in the late 1800s and up until the late 1970s for a variety of uses, including acoustic and thermal insulation and fireproofing, and is often found in ceiling and floor tiles, linoleum, pipes, structural beams, and asphalt. Any building, structure, surface asphalt driveway, or parking lot constructed prior to 1979 could contain asbestos or ACMs. As discussed in the Phase I ESA, based on the age of the structures on the Project Site (pre-1970), there is a potential for asbestos-containing building materials at the Project Site. However, all of the observed building materials appeared to be in good condition. Notwithstanding, in the event ACMs are found within areas proposed for demolition, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable regulations. With compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment. Therefore, with compliance with applicable regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and

impacts related to the removal of ACMs during demolition would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Lead-Based Paint

Lead is a naturally occurring element and heavy metal that was widely used as a major ingredient in most interior and exterior oil-based paints prior to 1950. Lead compounds continued to be used as corrosion inhibitors, pigments, and drying agents from the early 1950s to 1972, when the Consumer Products Safety Commission specified limits on lead content in such products. As noted in the Phase I ESA, based on the age of the onsite structures (pre-1970), there is potential for lead-based paint at the Project Site. However, during the site visit, all observable painted surfaces appeared to be in good condition. Notwithstanding, in the event that LBP is found within areas proposed for demolition, suspect materials would be removed in accordance with procedural requirements and regulations for the proper removal and disposal of LBP prior to demolition activities, including standard handling and disposal practices pursuant to OSHA regulations. Example procedural requirements include the use of respiratory protection devices while handling lead-containing materials, containment of lead or materials containing lead on the Project Site or at locations where construction activities are performed, and certification of all consultants and contractors conducting activities involving LBP or lead hazards. With compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of LBP into the environment. Therefore, with compliance with applicable regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts related to the removal of LBP during demolition would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Methane

The Project Site is also located within a designated Methane Buffer Zone mapped by the City. However, as discussed in detail in the Methane Report, the Project Site does not contain significantly elevated concentrations of methane or other light hydrocarbons. The Methane Report determined that based on the levels encountered and implementation of applicable LADBS requirements, there would not be unacceptable health risk to occupants. In addition, adherence to standard construction safety measures, as well as compliance with California Occupational Safety and Health Act (OSHA) safety requirements, would serve to reduce the risk in the event that elevated levels of gases are encountered during grading and construction. Therefore, with compliance with applicable regulatory measures, impacts related to methane would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Operation

Underground and Aboveground Storage Tanks

The Project does not propose the installation of USTs or ASTs. As such, operation of the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts associated with USTs or ASTs during operation of the Project would be less than significant. No further analysis of this topic in an EIR is required.

Polychlorinated Biphenyls

In accordance with existing regulations which ban the manufacture of PCBs, the new electrical systems to be installed as part of the Project would not contain PCBs. Therefore, during operation of the Project, maintenance of such electrical systems would not expose people to PCBs and operation of the Project would not expose people to any risk resulting from the release of PCBs in the environment. Therefore, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and no impacts related to PCBs during Project operation would occur. No further analysis of this topic in an EIR is required.

Asbestos-Containing Materials

Development of the Project would include the use of commercially-sold construction materials that would not include asbestos or ACMs because new asbestos products are no longer permitted in the marketplace. Project operation is, therefore, not anticipated to increase the occurrence of friable asbestos or ACMs at the Project Site. Therefore, operation of the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and no impacts associated with asbestos or ACMs during operation of the Project would occur. No further analysis of this topic in an EIR is required.

Lead-Based Paint

Development of the Project would include the use of commercially-sold construction materials that would not include LBP because the product is no longer widely used. Project operation is, therefore, not anticipated to increase the occurrence of LBP at the Project Site. Operation of the Project would not expose people to LBP as no LBPs would be used. Thus, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts associated with LBP during operation of the Project would not occur. No further analysis of this topic in an EIR is required.

Methane Gas

All new buildings and paved areas located within a Methane Buffer Zone would comply with the City of Los Angeles' Methane Mitigation Ordinance No. 175790. Under this ordinance, the Project Site is categorized as a Level II Site Design. As discussed in the Methane Report included as Appendix IS-5 of this Initial Study, the Project Site contains methane significantly below the lower explosive limit and more typical of background levels. Therefore, no additional mitigation is required. As the permitting process would ensure that new development would comply with the City's Methane Mitigation Ordinance and the Project does not include uses that would produce methane gas, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts associated with the release of methane gas during operation would be less than significant. No further analysis of this topic in an EIR is required.

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

Less Than Significant Impact. There is one existing school within 0.25 mile of the Project Site. Hubert Howe Bancroft Middle School is located approximately 0.21 mile southeast of the Project Site at 929 North Las Palmas Avenue. As previously discussed, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed uses would be typical of office developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used within and in the vicinity of the Project Site. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Specifically, the Project does not involve the development of industrial or other uses that would emit large amounts of chemicals or acutely hazardous materials. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable federal, state, and local regulations. As such, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

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

The Phase I ESA for the Project Site obtained a database search report that documents findings of various federal, state, and local regulatory database searches regarding properties with known or suspected releases of hazardous materials. Based on the database records search, five USEPA identification numbers associated with 0.375 tons of latex waste were issued to It's a Laugh Productions at 6565 Romaine Street. Based on the minor quantities and type of waste generated, this listing is not expected to represent a significant environmental concern for the Project Site. Several industrial waste permits related to wastewater discharges were also issued for businesses at 1006 Seward Street. Based on the nature of the businesses (food preparation), the industrial waste generated by the former and current tenants would not represent a significant environmental concern for the Project Site. Therefore, based on the above, the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard and impacts would be less than significant and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

No Impact. The Project Site is not located within an airport land use plan or within 2 miles of a public airport or public use airport. The nearest airport is the Hollywood-Burbank Airport located approximately 7 miles north of the Project Site. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The City of Los Angeles' General Plan Safety Element addresses public protection from unreasonable risks associated with natural disasters (e.g., fires, floods, earthquakes) and sets forth guidance for emergency response. Specifically, the Safety Element includes Exhibit H, Critical Facilities and Lifeline Systems, which identifies emergency evacuation routes, or disaster routes, along with the location of selected emergency facilities. The nearest emergency/disaster routes to the Project Site are Santa Monica Boulevard (0.1 mile) to the north and Beverly Boulevard (0.8 mile) to the south.⁴⁷ While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, both directions of travel would continue to be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. Therefore, the Project would not impede emergency access within the Project Site or vicinity that could cause an impediment along City designated disaster routes such that the Project would impair the implementation of the City's emergency response plan. As such, the Project's impact related to the implementation of the City's emergency response plan would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is located in an urbanized area of the City and there are no wildlands located on or in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone⁴⁸ or within a City-designated fire buffer zone.⁴⁹ Accordingly, the Project would not expose people or structures to a risk of loss, injury, or death involving wildland fires. No

⁴⁷ City of Los Angeles, *Safety Element of the Los Angeles City General Plan, Critical Facilities and Lifeline Systems*, Exhibit H, November 1996.

⁴⁸ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed March 3, 2020. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

⁴⁹ City of Los Angeles, *Safety Element of the Los Angeles City General Plan*, November 26, 1996, Exhibit D, p. 53.

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

X. HYDROLOGY AND WATER QUALITY

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

The following analysis is based, in part, on the *1000 Seward Mixed-Use Project Technical Report: Water Resources* (Water Resources Report) prepared for the Project by JLA Consulting Engineers, dated June 2020 and included as Appendix IS-6 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.

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, in accordance with the requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) adhering to the California Stormwater Quality Association BMP Handbook. The SWPPP would set forth BMPs to be used during construction for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion.

As discussed in Section 3, Project Description, of this Initial Study, below-grade parking would extend to a depth of approximately 45 feet. As provided in the Geotechnical Investigation included as Appendix IS-2 of this Initial Study, groundwater was encountered at depths of approximately 18 and 27 feet below the existing site grade. In addition, based on review of the Seismic Hazard Zone Report for the Hollywood Quadrangle, the historic high groundwater level for the Project Site was 18 feet below the ground surface. Thus, Project construction activities are expected to encounter groundwater which could require temporary pumps and filtration. Dewatering operations are practices that discharge non-stormwater, such as groundwater, that must be removed from a work location and discharged into the storm drain system to proceed with construction. Discharges from dewatering operations can contain high levels of fine sediments, which, if not properly treated, could lead to exceedance of the NPDES requirements. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all relevant NPDES requirements related to construction and discharges from dewatering operations.

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

Operation

Under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspired, captured and used, and/or treated through high efficiency BMPs onsite for the volume of water produced by the 85th percentile storm event. Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of an infiltration system, capture and use system, biofiltration/bioretention system, or a combination of these as required by the City's LID Manual. As the majority of potential contaminants are anticipated to be contained within the "first flush" 85th percentile storm event, major storms are not anticipated to cause an exceedance of regulatory standards.

As is typical of most urban developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, pathogens, trash and debris, oil and grease, and metals. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. As discussed in the Water Resources Report, the existing Project Site does not have any structural or LID BMPs to treat or infiltrate stormwater. Therefore, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. Implementation of the proposed BMP system would result in the treatment of the entire required volume for the Project Site and the elimination of pollutant runoff up to the 85th percentile storm event. Therefore, with the incorporation of LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. Impacts to surface water quality during operation of the Project would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Groundwater Quality

Construction

As discussed above, the Project would include excavations for subterranean parking and would result in a net export of existing soil material. Although not anticipated at the Project Site, any contaminated soils found would be captured within that volume of excavated material, properly removed from the Project Site, and remediated at an approved disposal facility in accordance with regulatory requirements.

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste, would reduce the potential for the construction of the Project to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. In addition, as there are no groundwater production wells or public water supply wells within 1 mile of the Project Site, construction activities would not be anticipated to affect existing wells. Therefore, the Project would not result in any substantial increase in groundwater contamination through hazardous materials releases and impacts on groundwater quality would be less than significant. No further evaluation of this topic in an EIR is required.

Operation

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

Generally, operational activities which could affect groundwater quality include spills of hazardous materials and leaking underground storage tanks. However, no USTs are currently operated or will be operated by the Project. In addition, while the development of new building facilities would slightly increase the use of on-site hazardous materials as described above, 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. Furthermore, operation of the Project would not require extraction from the groundwater supply because the subterranean walls would be designed to withstand hydrostatic pressure and permanent dewatering will not be required.

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

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

Less Than Significant Impact. As discussed above, based on the historically highest groundwater level and depth of proposed excavation, Project construction activities could encounter groundwater and temporary pumps and filtration may be required. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations. Any required dewatering would be temporary and cease when construction is complete. Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.

With regard to groundwater recharge, the percolation of precipitation that falls on pervious surfaces is variable, depending on the soil type, condition of the soil, vegetative cover, and other factors. According to the Water Resources Report, the Project Site is comprised of approximately 100 percent impervious surfaces under existing conditions. Therefore, the degree to which surface water infiltration and groundwater recharge would occur on-site is negligible. With implementation of the Project, the amount of landscaped area would increase, resulting in 82 percent impervious surfaces on the Project Site. However, as discussed in the Water Resources Report, though the proposed landscaping will reduce the imperviousness of the Project Site, thereby allowing some water to be diverted from the storm drain

system, a more conservative analysis was utilized which assumed 100 percent imperviousness for the Project condition. Using that conservative analysis, the Water Resources Report concluded that there is no incremental increase in the imperviousness of the Project Site that would substantially increase runoff volumes into the existing storm drain system. Therefore, peak flow rates would not change, and the Project would not interfere substantially with groundwater recharge such that groundwater management would be impeded.

Based on the above, the Project would not substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in the aquifer volume or lowering of the local groundwater table level. Therefore, impacts on groundwater supplies would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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

Less Than Significant Impact. Construction activities for the Project would involve removal of the existing structures and associated hardscape as well as the excavation and removal of soil. These activities have the potential to temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Exposed and stockpiled soils could also be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as discussed above in Response to Checklist Question X.a, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. These BMPs are designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Thus, with preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. As such, construction-related impacts to hydrology would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

The Project Site is comprised of approximately 100 percent impervious surfaces under existing conditions. As discussed above, with implementation of the Project, with the addition of new landscaping, the amount of impervious surfaces on the Project Site would be reduced to 82 percent. The new landscaped areas would be contained within the Project Site, resulting in only a limited potential for erosion or siltation, similar to existing conditions. Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion or siltation on-site or off-site would occur. Operational impacts to hydrology would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Construction activities for the Project would involve removal of the existing structures and associated hardscape as well as the excavation and removal of soil. These activities have the potential to temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. As discussed above in Response to Checklist Question X.a, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. These BMPs are designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. Thus, with preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in flooding on- or off-site. As such, construction-related impacts to hydrology would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

As discussed in the Water Resources Report, the Project Site is comprised of approximately 100 percent impervious surfaces under existing conditions. While the new landscaping proposed as part of the Project would decrease the amount of impervious surfaces on the Project Site to 82 percent, thereby reducing the amount of runoff entering the storm drain system, as discussed above, the Water Resources Report conservatively assumes no change in the amount of impervious surfaces on the Project Site. There is no incremental increase in the imperviousness of the Project Site that would substantially increase volumes into the existing storm drain system.

In the existing condition, hardscape sheet flows into the street and is discharged into the public storm drain system. The post-Project condition will manage any residual stormwater flow after LID treatment to discharge points at the curb face, which will discharge the stormwater to the public storm drain system. As discussed further below, the Project is not in a flood zone and the post-Project condition will not result in a net increase to the flow rate or volume of runoff that is going to the public storm drain system. Therefore, the Project would not cause flooding during a 50-year storm event or result in an adverse change to the movement of surface water on the Project Site. The stormwater infrastructure located in Willoughby Avenue and Las Palmas Avenue has sufficient capacity to accept the stormwater runoff from the existing conditions and since there would be no increase in flow rates, infrastructure would have sufficient capacity to handle post-Project flows.

Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that on-site or off-site flooding would occur. Operational impacts to hydrology would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed in the Water Resources Report, stormwater runoff from the Project Site is collected and conveyed into the public storm drain system. As discussed above, development of the Project would result in an increase in the landscaped areas throughout the Project Site, the amount of impervious surfaces on the Project Site is conservatively assumed to remain

approximately 100 percent. Accordingly, there would be no increase in runoff volumes into the existing storm drain system. In addition, the implementation of BMPs required by the City's LID Ordinance would target runoff pollutants that could potentially be carried in stormwater runoff, which represents an improvement over existing conditions where no BMPs are in place. Therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iv. impede or redirect flood flows?

No Impact. The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles.^{50,51} Thus, the Project would not impede or redirect flood flows. No impacts would occur, and no mitigation measures would be required. No further analysis of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed above, the Project Site is not located within a 100-year flood hazard area as mapped by FEMA or by the City of Los Angeles. However, the Safety Element of the City of Los Angeles General Plan maps the Project Site as being located within a potential inundation area.⁵² Specifically, the Project Site is located within the potential inundation area for the Hollywood Reservoir, which is held by the Mulholland Dam.⁵³ The Mulholland Dam is located in the Hollywood Hills approximately 2.0 miles north of the Project Site. Although the Project Site is mapped within an inundation zone for the dam, catastrophic failure of this dam is expected to be a very unlikely event in that dam safety regulations exist and are enforced by the Division of Safety of Dams, Army Corp of Engineers, and the Department of Water Resources. Inspectors would require dam owners to perform work, maintenance or implement controls if issues are found with the safety of the dam. The dams are under continuous monitoring for safety against failure and, therefore, the potential for seismically-induced flooding to affect the Project Site due to dam failure is low. Therefore, the risk of flooding from inundation by dam failure is considered low.

Furthermore, the Project Site is located approximately 11 miles east of the Pacific Ocean, and the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami.⁵⁴ Therefore, no tsunami or tsunami events would be expected to impact the Project Site. Additionally, there are no standing bodies of water on or near the Project Site that could result in a seiche.

⁵⁰ Federal Emergency Management Agency, Flood Insurance Rate Map, Panel Number 06037C1605F, effective September 26, 2008.

⁵¹ City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit F, p. 57.

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

⁵³ City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G, p. 59.

⁵⁴ City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G, p. 59.

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

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

Less Than Significant Impact. Under Section 303(d) of the Clean Water Act, States are required to identify water bodies that do not meet their water quality standards. Biennially, the Los Angeles Regional Water Quality Control Board (LARWQCB) prepares a list of impaired waterbodies in the region, referred to as the 303(d) list. The 303(d) list outlines the impaired waterbody and the specific pollutant(s) for which it is impaired. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL). As discussed in the Water Resources Report, the Project Site is located within the Ballona Creek Watershed. The County of Los Angeles, the City of Los Angeles, and all other cities in the Los Angeles Watershed are responsible for the implementation of watershed improvement plans or Enhanced Watershed Management Programs (EWMP) to improve water quality and assist in meeting the Total Maximum Daily Load (TMDL) milestones. The objective of the EWMP Plan is to determine the network of control measures (often referred to as BMPs) that will achieve required pollutant reductions while also providing multiple benefits to the community and leveraging sustainable green infrastructure practices. The Project Site, falls within the Ballona Creek EWMP and ultimately discharges the Pacific Ocean at the Santa Monica Bay. According to the State Water Resources Control Board (SWRCB), Ballona Creek, is listed as an impaired water body. Impairments for Ballona Creek include trash, toxic pollutants, bacteria, metals, and sediment.⁵⁵

Potential pollutants generated by the Project would be typical of office and commercial land uses and may include sediment, nutrients, pesticides, pathogens, trash and debris, oil and grease, and metals. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Since the existing Project Site does not have any structural or LID BMPs to treat or infiltrate stormwater, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. As such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans for Ballona Creek. In addition, while development of the Project would result in an increase in the landscaped areas throughout the Project Site, reducing the amount of impervious surfaces to 82 percent, the planted areas would serve as biofiltration which would reduce any pollutants entering the groundwater. Since the Project's LID BMP design is for biofiltration, treated runoff would be discharged into the storm drain system, away from the structures and groundwater table.

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

⁵⁵ California Environmental Protection Agency, State Water Resources Control Board, Impaired Water Bodies, www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2014_2016.shtml?wbid=CAT4051700020000301101951, accessed May 21, 2020.

XI. LAND USE AND PLANNING

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

a. Would the project physically divide an established community?

Less than Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is located within a commercial, industrial, and residential area. Land uses located adjacent to the Project Site include an approximately 64-foot-tall parking structure to the north; a 76-foot-tall office building, multi-family residential buildings and an above-grade parking structure to the west; a 76-foot-tall office/commercial building and industrial uses to the south; and multi-family residential buildings to the east. The Project Site is currently developed with a 2,551-square-foot restaurant and an 8,442 square-foot studio and production space along with surface parking.

The Project would develop a new mixed-use building on the Project Site. All proposed development would occur within the boundaries of the Project Site, and the Project would not require the vacation of any surrounding streets adjacent to the Project Site. The proposed mixed-use, office development would also be consistent with the uses already on the Project Site and immediately surrounding the Project Site. In addition, the Project does not propose a freeway or other large infrastructure that would divide the existing surrounding community. Therefore, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project requires several discretionary approvals including, but not limited to, a General Plan Amendment, a Vesting Zone/Height District Change, and a Master Conditional Use Permit. While the Project would not be anticipated to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, the EIR will provide further analysis of the Project's consistency with applicable land use plans, policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect.

XII. MINERAL RESOURCES

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

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

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

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

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

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

⁵⁷ City of Los Angeles Department of Public Works, Bureau of Engineering, NavigateLA, <http://navigate.lacity.org/navigate/>, accessed April 15, 2020.

XIII. NOISE

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

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

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

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

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

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

Less Than Significant Impact. The Project Site is not located within the vicinity of a private airstrip or within 2 miles of a public airport or public use airport. The nearest airport is the Hollywood–Burbank

Airport located approximately 7 miles north of the Project Site. Therefore, the Project would not expose people residing or working in the project area to excessive airport noise. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

XIV. POPULATION AND HOUSING

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

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

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

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

As previously discussed, the Project would include the development of 150,600 square feet of floor area under one of two development options. Under Option A, the Project would develop 136,200 square feet of office uses, 12,200 square feet of restaurant uses (of which 6,100 square feet may be used for an entertainment use), and 2,200 square feet of retail uses. Under Option B, the Project would develop 134,100 square feet of office uses, 14,300 square feet of restaurant uses (of which 6,100 square feet may be used for an entertainment use), and 2,200 square feet of retail uses. Under Option A, both the existing 2,551 square-foot restaurant and 8,442 square-foot studio and production space would be demolished, while under Option B, the 8,442 square-foot studio and production space would be demolished and the 2,551 square-foot restaurant would remain. Based on employee generation factors from the City of Los Angeles Department of Transportation (LADOT), the Project is estimated to generate approximately 584

net new employees on the Project Site under Option A and 597 net new employees under Option B.⁵⁸ Based on a linear interpretation of employment data included in the 2016-2040 RTP/SCS, an estimated 1,915,868 employees are projected within the City of Los Angeles in 2025, the Project's buildout year, with 84,411 new employees between 2020 and 2025. The Project would represent 0.03 percent of the total number of employees in 2025 and 0.69 percent of the growth between 2020 and 2025 under Option A and 0.03 percent of the total number of employees in 2025 and 0.71 percent of the growth between 2020 and 2025 under Option B. Using employment data from the 2020-2045 RTP/SCS, an estimated 1,937,555 employees are projected within the City of Los Angeles in 2025, the Project's buildout year, with 49,586 new employees between 2020 and 2025. The Project would represent 0.03 percent of the total number of employees in 2025 and 1.18 percent of the growth between 2020 and 2025 under Option A and 0.03 percent of the total number of employees and 1.20 percent of the growth between 2020 and 2025 under Option B. As noted above, the Project would not introduce new homes at the Project Site and would therefore not result in a direct population growth in the area and the number of jobs would be consistent with both SCAG's 2016-2040 RTP/SCS and 2020-2045 RTP/SCS. While some of the new employment positions could be filled by persons who would relocate to the vicinity of the Project Site, this potential increase in population would not be substantial since not all employees would move close to the Project Site. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project Site and other persons would commute to the Project Site from other communities in and outside of the City. Therefore, given that the Project would not directly contribute to substantial population growth in the Project area through the development of residential uses and as some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site or who would commute, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Furthermore, as the Project would be located in a highly developed area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth. Based on the above, the Project would not induce substantial population or housing growth. Impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is currently occupied by studio, production, and restaurant uses and no housing currently exists on the Project Site. The Project would not displace any existing people or housing. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

⁵⁸ Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.

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

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

Potentially Significant Impact. LAFD provides fire protection and emergency medical services for the Project Site. The Project would increase the building square footage on-site and would introduce new commercial uses which could result in the need for additional fire protection services. Therefore, further analysis of this issue will be included in the EIR..

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

Potentially Significant Impact. Police protection for the Project Site is provided by the City of Los Angeles Police Department. The Project would introduce new commercial uses to the Project Site, which could result in the need for additional police services. Therefore, further analysis of this issue will be included in the EIR..

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 LAUSD which is divided into six local districts.⁵⁹ The Project Site is located in Local District–West.⁶⁰ As previously

⁵⁹ Los Angeles Unified School District, Local District Maps 2015–2016, <http://achieve.lausd.net/Page/8652>, accessed April 15, 2020.

⁶⁰ Los Angeles Unified School District, Local District—West Map, <https://achieve.lausd.net/site/handlers/filedownload.ashx?moduleinstanceid=22573&dataid=24308&FileName=West.pdf>, accessed April 15, 2020.

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

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

Less Than Significant Impact. Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. Nearby parks and recreational facilities within an approximate 2-mile radius of the Project Site include: Hollywood Recreation Center (located 0.28 mile northeast of the Project Site); De Longpre Park and (located 0.47 mile north of the Project Site); Selma Park (located 0.75 mile north of the Project Site); Poinsettia Recreation Center (located 0.97 mile west of the Project Site); Yucca Community Center (located 1.0 mile north of the Project Site); Las Palmas Senior Citizen Center (located 1.11 miles north of the Project Site); Seily Rodriguez Park (located 1.13 miles east of the Project Site); Carlton Way Park (located 1.15 miles northeast of the Project Site); Dorothy & Benjamin Smith Park (located 1.17 miles northwest of the Project Site); Burns Park (located 1.34 miles southeast of the Project Site); Runyon Canyon Park (located 1.46 miles northwest of the Project Site); Pan Pacific Park (located 1.52 miles southwest of the Project Site); La Mirada Park (located 1.53 miles northeast of the Project Site); Pan Pacific Senior Activity Center (located 1.6 miles southwest of the Project Site); Lemon Grove Recreation Center (located 1.67 miles east of the Project Site); Wattles Garden Park (located 1.67 miles northwest of the Project Site); and Fairfax Senior Citizen Center (located 1.71 miles west of the Project Site).⁶¹

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

⁶¹ City of Los Angeles Department of Recreation and Parks, Facility Map Locator, [www.laparks.org/maplocator?cat_id=All&geo\[radius\]=2&geo\[latitude\]=34.0890273&geo\[longitude\]=-118.333082&address=1000%20Seward%20St,%20Los%20Angeles,%20CA%2090038,%20USA](http://www.laparks.org/maplocator?cat_id=All&geo[radius]=2&geo[latitude]=34.0890273&geo[longitude]=-118.333082&address=1000%20Seward%20St,%20Los%20Angeles,%20CA%2090038,%20USA), accessed April 15, 2020.

seating for use by employees, reducing the likelihood employees would use local parks. Specifically, under either option, the Project would provide approximately 34,550 square feet of open space (500 square feet of which would be a publicly accessible ground floor plaza). Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks or the need for new or physically altered parks. Impacts would be less than significant, and no mitigation measures are required. No further analysis of the issue in an EIR is required.

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

Potentially Significant Impact. Other public facilities available include libraries. The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles through its Central Library, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through Web-based resources.⁶² The Project area is served by existing libraries within the Hollywood Community Plan area, including the John C. Fremont Branch Library, located 0.38 mile south of the Project Site.⁶³ Although the Project does not propose the development of residential uses, the new daytime population generated by the Project may result in additional demand for library services provided by the LAPL, possibly necessitating the construction of new libraries which could cause significant environmental impacts. Therefore, further analysis of this topic in the EIR is required to determine the Project’s potential impacts on library services provided by the LAPL.

XVI. RECREATION

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

⁶² Los Angeles Public Library, Los Angeles Public Library Strategic Plan 2015–2020, www.lapl.org/sites/default/files/media/pdf/about/LAPL_Strategic_Plan_2015-2020.pdf, accessed April 15, 2020.

⁶³ Los Angeles Public Library, Locations and Hours, www.lapl.org/branches?distance%5Bpostal_code%5D=90038&distance%5Bsearch_distance%5D=2&distance%5Bsearch_units%5D=mile&field_branch_resources_services_tid=All, accessed April 15, 2020.

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

Less Than Significant Impact. As discussed in the Response to Checklist Question XV(d) above, the Project does not propose the development of residential uses which would create a demand on nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create a demand for parks and recreational facilities. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks and recreational facilities. The Project would also provide on-site open space. Specifically, under either option, the Project would provide approximately 34,550 square feet of open space (500 square feet of which would be a publicly accessible ground floor plaza area). In addition, Project employees would be more likely to use parks near their homes during non-work hours. Therefore, the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. The impact on parks and recreational facilities would be less than significant, and mitigation measures would not be required. No further evaluation of this topic in an EIR is required.

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

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

XVII. TRANSPORTATION

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

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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d. Result in inadequate emergency access?

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

A Transportation Assessment (TA) in accordance with LADOT’s Transportation Assessment Guidelines (TAG) adopted in July 2019 and updated in July 2020 will be prepared for the Project. In accordance with the TAG and consistent with the City CEQA Transportation Thresholds (adopted July 30, 2019), the Transportation Assessment’s CEQA-required analyses will include an assessment of whether the Project would result in potential conflicts with transportation-related plans, ordinances, or policies. The results of the Transportation Assessment 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, to a new measurement that better addresses the state’s goals on reduction of greenhouse gas emissions, creation of a multi-modal transportation, and promotion of mixed-use developments. CEQA Guidelines Section 15064.3 states that vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts, replacing LOS.

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

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

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

Less Than Significant Impact. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. The Project Site is located in a highly urbanized area developed with roadways and infrastructure. All access and circulation associated with

the Project would be designed and constructed in conformance with all applicable requirements established by LADBS, LAFD, and the LAMC. The Project would not include any new roads that would result in an increase in hazards due to a design feature. As noted above, vehicular access to the Project Site would be provided via a two-way driveway along Hudson Avenue that would provide access to the building's ground-level, above-grade, and subterranean parking. As such, the number of curb cuts on the Project Site would be reduced from five to one. In addition, the Project would not result in incompatible uses as the proposed uses are consistent with the types of commercial and office uses already present in the surrounding area. Thus, no impacts related to increased hazards due to a design feature or incompatible use would occur, and no further analysis of this topic in the EIR is required.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. The City of Los Angeles' General Plan Safety Element addresses public protection from unreasonable risks associated with natural disasters (e.g., fires, floods, earthquakes) and sets forth guidance for emergency response. Specifically, the Safety Element includes Exhibit H, Critical Facilities and Lifeline Systems, which identifies emergency evacuation routes, or disaster routes, along with the location of selected emergency facilities. The nearest emergency/disaster routes to the Project Site are Santa Monica Boulevard (0.1 mile) to the north and Beverly Boulevard (0.8 mile) to the south.⁶⁴

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

XVIII. TRIBAL CULTURAL RESOURCES

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

⁶⁴ City of Los Angeles, *Safety Element of the Los Angeles City General Plan, Critical Facilities and Lifeline Systems*, Exhibit H, November 1996.

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

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

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

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

As noted above, the Project would require grading, excavation, and other construction activities to a depth of 45 feet that could have the potential to disturb existing but undiscovered tribal cultural resources. Therefore, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In

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

XIX. UTILITIES AND SERVICE SYSTEMS

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

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, Electric Power, and Natural Gas)/Less Than Significant Impact (Wastewater, Stormwater, and Telecommunications Facilities). Water, wastewater, electric power, and natural gas systems consist of two components, the source of the supply or place of treatment (for wastewater), and the conveyance systems (i.e., distribution lines and mains) that link the location of these facilities to an individual development site. Given the Project's increase in the amount of developed floor area on the Project Site and the potential corresponding increase in water, electricity, and natural gas demand, further analysis of this issue in an EIR will be provided. Wastewater and telecommunications facilities are analyzed below. Stormwater is analyzed under Section X, Hydrology and Water Quality, and a brief summary of the above conclusions are provided below. The analysis of

wastewater is based, in part, on the Utility Infrastructure Technical Report: Wastewater (Wastewater Report), prepared for the Project by JLA in June 2020 and included as Appendix IS-7 of this Initial Study.

Wastewater

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Water Reclamation Plant (HWRP). The HWRP has a capacity of 450 million gallons per day (mgd),⁶⁵ and current average wastewater flows are at approximately 275 mgd.⁶⁶ Accordingly, the remaining available capacity at the HWRP is approximately 175 mgd. As shown in Table 3 on page 76, under Option A, the Project would generate a net increase in wastewater flow from the Project Site of approximately 31,307 gpd, or approximately 0.03 mgd. Under Option B, as shown in Table 4 on page 77, the Project would generate a net increase in wastewater flow from the Project Site of 37,055 gpd, or approximately 0.04 mgd. The Project's increase in average daily wastewater flow of 0.03 or 0.04 mgd depending on the development option would represent approximately 0.02 percent of the current estimated 175 mgd of remaining available capacity at the HWRP. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the HWRP. Furthermore, wastewater flows would be typical of office and commercial developments. No industrial discharge into the wastewater system would occur. Discharge of effluent from the HWRP into Santa Monica Bay is also regulated by permits issued under the NPDES and is required to meet LARWQCB requirements. As LA Sanitation & Environment (LASAN) monitors the treated wastewater, wastewater treated at the HWRP would not exceed wastewater treatment requirements of LARWQCB and new or expanded treatment facilities would not be required.

Sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. As discussed in the Wastewater Report, there is currently an existing 12-inch vitrified clay pipe (VCP) sewer line in Seward Street flowing south, and an 8-inch VCP sewer line in Hudson Avenue flowing south that would connect to a network of sewer lines and ultimately convey wastewater to the HWRP. This sewer line in Seward Street has a capacity of 3.77 cubic feet per second (cfs) (2,436,445 gpd) and the sewer line in Hudson Avenue has a capacity of 0.90 cfs (581,645 gpd). The Project's net increase in wastewater generation would be approximately 31,307 gpd under Option A or 37,055 under Option B. The Bureau of Sanitation stated that the sewer system is able to accommodate the Project's proposed discharge of up to 37,477 gpd of wastewater to the 12-inch sewer main in Seward Street and the 8-inch sewer main in Hudson Avenue (with 75 percent of flow discharging to Seward and 25 percent of flow discharging to Hudson). Thus, the Project's maximum net increase in sewage generation discharging to Seward Street and Hudson Avenue are approximately 24,663 gpd and 8,221 gpd, respectively. This represents approximately 1.0 percent of the 12-inch pipe's capacity, and 1.4 percent of the 8-inch pipe's capacity. As required by LAMC Section 64.15, the Project would submit a Sewer Capacity Availability Request to LASAN to evaluate the capability of the existing wastewater system and obtain approval to discharge the Project's wastewater to the existing 12-inch sewer line in Seward Street and the 8-inch line in Hudson Avenue. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer

⁶⁵ LASAN, Water Reclamation Plants, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=vm8qwvj80_4&_afLoop=18606279438697733#!, accessed May 26, 2020.

⁶⁶ LASAN, Water Reclamation Plants, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=vm8qwvj80_4&_afLoop=18606279438697733#!, accessed May 26, 2020.

**Table 3
Estimated Project Wastewater Generation—Option A**

Land Use	Floor Area	Wastewater Generation Rate (gpd/unit) ^a	Wastewater Generation (gpd)
EXISTING			
Studio and Production Space	8,442 sf	0.05 gpd/sf	422
Restaurant	100 seats	30 gpd/seat	3,000
<i>Total</i>			3,422
Total to be Removed			3,422
PROPOSED			
Office	136,200 sf	0.12 gpd/sf	16,344
Retail	2,200 sf	0.025 gpd/sf	55
Restaurant (new)	611 seats	30 gpd/seat	18,330
Proposed Wastewater Generation			34,729
Less Existing to be Removed			(3,422)
Net Additional Wastewater Generation (Proposed – Existing to be Removed)			31,307
<hr/> <i>sf = square feet</i> <i>gpd = gallons per day</i> ^a <i>Wastewater generation rates are based on 2012 LASAN Sewer Generation Rates.</i> <i>Source: JLA, June 2020.</i>			

capacity and connection permit for the Project during the Project’s permitting process. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Therefore, the Project would not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer’s capacity is already constrained or that would cause a sewer’s capacity to become constrained.

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

Stormwater

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

Table 4
Estimated Project Wastewater Generation—Option B

Land Use	Floor Area	Wastewater Generation Rate (gpd/unit) ^a	Wastewater Generation (gpd)
EXISTING			
Studio and Production Space	8,442 sf	0.05 gpd/sf	422
Restaurant (2,551 sf)	100 seats	30 gpd/seat	3,000
<i>Total</i>			3,422
Total to Be Removed			422
PROPOSED			
Office	134,100 sf	0.12 gpd/sf	16,092
Retail	2,200 sf	0.025 gpd/sf	55
Restaurant (new)	611 seats	30 gpd/seat	18,330
Restaurant (existing)	100 seats	30 gpd/seat	3,000
Proposed Wastewater Generation			37,477
Less Existing to be Removed			(422)
Net Additional Wastewater Generation (Proposed – Existing to be Removed)			37,055
<hr/> <i>sf = square feet</i> <i>gpd = gallons per day</i> ^a <i>Wastewater generation rates are based on 2012 LASAN Sewer Generation Rates.</i> <i>Source: JLA, June 2020.</i>			

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

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

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

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

Less Than Significant Impact. As discussed above, the Project would generate a maximum net increase in wastewater flow from the Project Site of approximately 0.03 mgd, depending on which option is developed. The Project's increase in average daily wastewater flow of 0.03 mgd would represent approximately 0.02 percent of the current 175 mgd of remaining available capacity of the HWRP.⁶⁷ Therefore, wastewater generated by the Project would be accommodated by the existing capacity of the HWRP.

Various factors, including future development of new treatment plants, upgrades and improvements to existing treatment capacity, development of new technologies, etc., will ultimately determine the available capacity of the Hyperion Service Area in 2024, the year by which construction of the Project is expected to be completed. Planned upgrades would provide for improvements beyond 2040 to serve future population needs. However, it is conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to 2024. Thus, based on this conservative assumption, the capacity of the HWRP in 2024 would continue to be 450 mgd.

Based on LASAN's average flow projections for the HWRP, it is anticipated that average flows in 2024, the Project build-out year, would be approximately 263.6 mgd.⁶⁸ Accordingly, the future remaining available capacity in 2024 would be approximately 186.4 mgd.⁶⁹ The Project's increase in average daily wastewater flow of 0.03 mgd would represent approximately 0.02 percent of the estimated future remaining available capacity of 186.4 mgd at the HWRP.⁷⁰ Therefore, wastewater generated under the Project would be accommodated by the future capacity of the HWRP.

Additionally, the Project's net increase in average daily wastewater generation of 0.03 mgd plus the current average flows of approximately 275 mgd to the HWRP would represent approximately 61.1 percent⁷¹ of the HWRP's capacity of 450 mgd. With regard to future flows, the Project's net increase of

⁶⁷ $(0.03 \text{ mgd} / 175 \text{ mgd}) \times 100 = 0.02\%$

⁶⁸ Los Angeles Department of Water and Power, One Water LA 2040 Plan-Volume 2, Table ES.1, Projected Wastewater Flows. Based on a straight-line interpolation of the projected flows for the Hyperion Water Reclamation Plant for 2020 (approximately 256 mgd) and 2030 (approximately 275 mgd). The 2024 value is extrapolated from 2020 and 2030 values: $[(275 \text{ mgd} - 256 \text{ mgd}) \div 10] \times 4 + 256 = \sim 263.6 \text{ mgd}$.

⁶⁹ $450 \text{ mgd} - 263.6 \text{ mgd} = 186.4 \text{ mgd}$

⁷⁰ $(0.03 \text{ mgd} \div 186.4 \text{ mgd}) \times 100 = 0.02 (\sim 0.02\%)$

⁷¹ $[(0.03 \text{ mgd} + 275 \text{ mgd}) \div 450 \text{ mgd}] \times 100 = 61.11 (\sim 61.1\%)$

0.03 mgd plus the projected flows of approximately 263.6 mgd to the HWRP would also represent approximately 58.6 percent⁷² of the HWRP's assumed future capacity of 450 mgd.

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

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

Less Than Significant Impact. While the Bureau of Sanitation generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County are categorized as either Class III or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in inert waste landfills.⁷³ Nine Class III landfills and one inert waste landfill with solid waste facility permits are currently serving the County.⁷⁴ In addition, there is one solid waste transformation facility within Los Angeles County that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery.

Based on 2018 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the most recent report available, the total remaining permitted Class III landfill capacity in the County is estimated at 163.39 million tons. The permitted inert waste landfill serving the County is Azusa Land Reclamation. This facility currently has 57.72 million tons of remaining capacity and an average daily in-County disposal rate of 1,148 tons per day.⁷⁵ Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the CoIWMP Annual Reports. Within each annual report, future landfill

⁷² $[(32,884 \text{ gpd} + 263.6 \text{ mgd}) \div 450 \text{ mgd}] \times 100 = 58.59$ (~ 58.6%)

⁷³ Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

⁷⁴ County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2018 Annual Report, December 2019. The 9 Class III landfills serving the County include the Antelope Valley Landfill, the Burbank Landfill, the Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, Savage Canyon Landfill, the Scholl Canyon Landfill, and the Sunshine Canyon City and County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

⁷⁵ County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2018 Annual Report, December 2019.

disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.⁷⁶

Based on the 2018 CoIWMP Annual Report, the countywide cumulative need for Class III landfill disposal capacity through the year 2033 will not exceed the 2018 remaining permitted Class III landfill capacity of 163.39 million tons. The 2018 CoIWMP Annual Report evaluated six scenarios to increase capacity and determined that the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with existing capacity under six scenarios using in-county and out-of-county landfills. Only the scenario using in-county disposal capacity only would result in a shortfall. The 2018 CoIWMP Annual Report also concluded that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling; expand existing landfills; study, promote, and develop alternative technologies; expand transfer and processing infrastructure; and use out of county disposal, including waste by rail. The City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan sets a goal of becoming a "zero waste" city by 2030. To this end, the City of Los Angeles implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling.⁷⁷ The City of Los Angeles is currently diverting 76 percent of its waste from landfills.⁷⁸ The City has adopted the goal of achieving 90 percent diversion by 2025, and zero waste by 2030.

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

Construction

As previously discussed, the Project would include the development of new office, restaurant, and retail uses totaling 150,600 square feet in one of two development options. Under Option A, the Project would develop 136,200 square feet of office uses, 12,200 square feet of restaurant uses (of which 6,100 square feet may be used for an entertainment use), and 2,200 square feet of retail uses. Under Option B, the Project would develop 134,100 square feet of office uses, 14,300 square feet of restaurant uses (of which 6,100 square feet may be used for an entertainment use), and 2,200 square feet of retail uses. Pursuant to the requirements of SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. Furthermore, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. Thus, although the total diversion rate may ultimately exceed 75 percent, this analysis conservatively assumes a diversion rate of 75 percent.

⁷⁶ County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2018 Annual Report, December 2019.

⁷⁷ City of Los Angeles, Solid Waste Integrated Resource Plan FAQ; www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPFAQS.pdf, accessed April 20, 2020.

⁷⁸ LA Sanitation, Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=alxbkb91s_4&_afLoop=18850686489149411#!, accessed April 20, 2020.

Based on construction and debris rates established by the USEPA and after accounting for mandatory recycling, as shown in Table 5 on page 82, the Project would generate approximately 286 tons of construction-related waste under Option A, or 237 tons under Option B, as shown in Table 6 on page 83. It should be noted that soil export is not typically included in the calculation of construction waste to be landfilled since soil is not disposed of as waste but, rather, is typically used as a cover material or fill at other construction sites requiring soils import. Given the remaining permitted capacity at the Azusa Land Reclamation facility, which is approximately 57.72 million tons, as well as the remaining 163.39 million tons of capacity at the Class III landfills serving the County, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

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

Operation

As shown in Table 7 on page 84, upon full buildout, the Project would result in a net increase in solid waste generation of 415 tons per year under Option A. As shown in Table 8 on page 85, under Option B the Project would result in a net increase in solid waste generation of 483 tons per year. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures, such as compliance with AB 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.⁷⁹ Under either option, the estimated net increase in solid waste that would be generated by the Project represents approximately 0.0003 percent of the remaining capacity (163.39 million tons) for the Class III landfills serving the County.⁸⁰

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 2018 Annual Report. As discussed below, the Project would be consistent with and would further City policies that reduce landfill waste streams. Such policies and programs serve to implement the strategies outlined

⁷⁹ LA Sanitation, Solid Waste Integrated Resources Plan, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?_afLoop=3608041245788654&_afWindowMode=0&_afWindowId=null&_adf.ctrl-state=8vrc5bges_179#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D3608041245788654%26_afWindowMode%3D0%26_adf.ctrl-state%3D8vrc5bges_183, accessed April 20, 2020.

⁸⁰ $(321 \text{ tons per year} / 163.39 \text{ million tons}) \times 100 \approx 0.0002\%$ and $(356 \text{ tons per year} / 163.39 \text{ million tons}) \times 100 \approx 0.0002\%$

**Table 5
Project Demolition and Construction Waste Generation—Option A**

Building	Size	Generation Rate (lbs/sf) ^a	Total (tons)
Construction Waste			
Office	136,200 sf	3.89	265
Restaurant	12,200 sf	3.89	24
Retail	2,200 sf	3.89	4
<i>Construction Waste Subtotal</i>			293
Demolition Waste			
Studio and Production Space	8,442 sf	155	654
Restaurant	2,551 sf	155	198
<i>Demolition Waste Subtotal</i>			852
Total for Construction and Demolition Waste			1,145
Total After 75-Percent Recycling			286
<hr/> <i>lbs = pound</i> <i>sf = square feet</i> ^a U.S. Environmental Protection Agency, Report No. EPA530-98-010, <i>Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 4 and Table 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types.</i> <i>Source: Eyestone Environmental, 2020.</i>			

in the 2018 Annual Report to adequately meet countywide disposal needs through 2033 without capacity shortages.

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

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

Less Than Significant Impact. Solid waste management in the state is primarily guided by AB 939, the California Integrated Waste Management Act of 1989, which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand

**Table 6
Project Demolition and Construction Waste Generation—Option B**

Building	Size	Generation Rate (lbs/sf) ^a	Total (tons)
Construction Waste			
Office	134,100 sf	3.89	261
Restaurant	14,300 sf	3.89	28
Retail	2,200 sf	3.89	4
<i>Construction Waste Subtotal</i>			293
Demolition Waste			
Studio and Production Space	8,442 sf	155	654
<i>Demolition Waste Subtotal</i>			654
Total for Construction and Demolition Waste			947
Total After 75-Percent Recycling			237
<hr/> <i>lbs = pound</i> <i>sf = square feet</i> ^a U.S. Environmental Protection Agency, Report No. EPA530-98-010, <i>Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 4 and Table 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types.</i> Source: Eyestone Environmental, 2020.			

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 Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste generated per week.⁸¹ Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.⁸² 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

⁸¹ 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.

⁸² Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

**Table 7
Estimated Project Operation Solid Waste Generation—Option A**

Building	Size	Employee Generation Rate per sf^a	Estimated No. of Employees	Solid Waste Generation Rate^b	Total Generation (tons/year)
Existing					
Studio and Production Space	8,442 sf	0.00479	34 emp	0.37 tn/emp/yr	13
Restaurant	2,551 sf	0.00271	10 emp	2.98 tn/emp/yr	30
<i>Total</i>					43
Total to Be Removed					43
Proposed					
Office	136,299 sf	0.00479	545 emp	0.37 tn/emp/yr	202
Restaurant	12,200 sf	0.00271	82 emp	2.98 tn/emp/yr	244
Retail	2,200 sf	0.00271	4 emp	2.98 tn/emp/yr	12
Total Proposed					458
Total Net Increase					415
<p><i>sf = square feet</i></p> <p><i>tn/emp/yr = tons per employee per year</i></p> <p>^a <i>Employee Generation Rates from Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.</i></p> <p>^b <i>Non-residential yearly solid waste generation factors from LASAN City Waste Characterization and Quantification Study, Table 4, July 2002. Assumes rate of 0.37 tons per employee per year (Services – Business) for office uses.</i></p> <p><i>Source: Eyestone Environmental, 2020.</i></p>					

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

**Table 8
Estimated Project Operation Solid Waste Generation—Option B**

Building	Size	Employee Generation Rate per sf^a	Estimated No. of Employees	Solid Waste Generation Rate^b	Total Generation (tons/year)
Existing					
Studio and Production Space	8,442 sf	0.00479	34 emp	0.37 tn/emp/yr	13
Restaurant	2,551 sf	0.00271	10 emp	2.98 tn/emp/yr	30
<i>Total</i>					43
Total to Be Removed					13
Proposed					
Office	134,100 sf	0.00479	536 emp	0.37 tn/emp/yr	198
Restaurant	14,300 sf	0.00271	96 emp	2.98 tn/emp/yr	286
Retail	2,200 sf	0.00271	4 emp	2.98 tn/emp/yr	12
Total Proposed					496
Total Net Increase					483
<p><i>sf = square feet</i> <i>tn/emp/yr = tons per employee per year</i> ^a <i>Employee Generation Rates from Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.</i> ^b <i>Non-residential yearly solid waste generation factors from LASAN City Waste Characterization and Quantification Study, Table 4, July 2002. Assumes rate of 0.37 tons per employee per year (Services – Business) for office uses.</i> <i>Source: Eyestone Environmental, 2020.</i></p>					

XX. WILDFIRE

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

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

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

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

No Impact (a-d). As discussed above, the Project Site is located in an urbanized area, and there are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone,⁸³ a state responsibility area, nor is it located within a City-designated fire buffer zone.⁸⁴ Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. No impacts regarding wildfire risks would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

⁸³ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5533012025, 5533012013, 5533012012, and 5533012011, <http://zimas.lacity.org/>, accessed April 14, 2020. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older “Mountain Fire District” and “Buffer Zone” shown on Exhibit D of the Los Angeles General Plan Safety Element.

⁸⁴ City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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

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

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

Potentially Significant Impact. The potential for cumulative impacts occurs when the impacts of the Project are combined with impacts from related development projects and result in impacts that are greater than the impacts of the Project alone. Located in the vicinity of the Project Site are other current and reasonably foreseeable projects, the development of which, in conjunction with that of the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in the EIR for the following subject areas: air quality; cultural resources; energy; greenhouse gas emissions; land use and planning; noise; transportation; tribal cultural resources; and water supply.

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

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

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

Related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, as with the Project, related projects would be subject to the City’s LID requirements and, for applicable projects, NPDES permit requirements, including development of SWPPPs for construction projects greater than one acre, compliance with SUSMP requirements during operation, and compliance with other local requirements pertaining to hydrology and surface water quality. It is anticipated that related projects would also be evaluated on an

individual basis by City of Los Angeles Department of Public Works to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to hydrology and water quality. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

In terms of population and housing, related development would not induce substantial population growth since most of the City is already fully developed and occupied by a long-standing residential population. In addition, not all related projects include residential uses and therefore would not contribute to population growth. As discussed in the analysis above, the Project does not propose residential uses and thus would not directly contribute to population growth. While the Project would not displace housing or people, other projects might displace existing housing and people residing in them. However, even if construction of replacement housing were required elsewhere, such developments would likely occur on infill sites within the City and the appropriate level of environmental review would be conducted to analyze the extent to which the related projects could cause significant environmental impacts. Overall, the Project's contribution would not be cumulatively considerable since no residential units are proposed, and cumulative impacts related to population and housing would be less than significant.

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

With respect to wastewater, since the HWRP is in compliance with the state's wastewater treatment requirements, and the wastewater generated by related development would most likely be typical of urban uses, no industrial discharges into the wastewater system are likely to occur that would exceed the wastewater treatment requirements of the LARWQCB. Consequently, there would be no need to construct new or expand wastewater treatment facilities, the construction of which could cause significant environmental effects. Therefore, the Project and related projects would not result in significant

cumulative impacts with respect to the wastewater treatment systems. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

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

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

The Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction periods. However, given the urbanized and built-out nature of most of the City, it is anticipated that other projects would similarly represent a minor percentage of the remaining capacity of the County's Class III landfills serving the County. Additionally, the demand for landfill capacity is continually evaluated by the County through preparation of the CoIWMP annual reports. Each annual CoIWMP report assesses future landfill disposal needs over a 15 year planning horizon. Based on the 2018 CoIWMP Annual Report, the County anticipates that future disposal needs can be adequately met for the next 15 years (i.e., 2033) with implementation of strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail. The preparation of each annual CoIWMP provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Furthermore, in future years, it is anticipated that the rate of declining landfill capacity would slow considering the City's goal to achieve zero waste by 2030. Therefore, the Project's contribution would not be cumulatively considerable, and cumulative impacts with respect to solid waste would be less than significant.

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

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

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project could result in potentially significant impacts with regard to the following topics: air quality; cultural resources; energy; greenhouse gas emissions; land use and planning; noise; public services (fire, police, and libraries); transportation; tribal cultural resources; and utilities and service systems (water supply and energy infrastructure). As a result, these potential effects will be analyzed further in the EIR.