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

INITIAL STUDY

1151 N. Las Palmas Avenue Project

Case Number: ENV-2021-10480-MND

Project Location: 1128-1146 N. Las Palmas Avenue, 1139-1155 N. Las Palmas Avenue, and 1138-1150 N. McCadden Place

Community Plan Area: Hollywood Community Plan

Council District: 13- Hugo Soto-Martinez

Project Description: The 1151 N. Las Palmas Avenue Project (the Project) proposes the construction of a new creative office building and the renovation, expansion, and change of use of an existing manufacturing building on an 89,752-square-foot site located in the Hollywood Community Plan area at 1128-1146 N. Las Palmas Avenue, 1139-1155 N. Las Palmas Avenue, and 1138-1150 N. McCadden Place (Project Site) in the City of Los Angeles (the City).

The Project would demolish the existing 45,000-square-foot parking lot and construct a three-story, approximately 45-foot tall (50-foot tall to the top of the parapet), 80,987 square-foot, creative office building with a three-level subterranean garage at 1139-1149 N. Las Palmas Avenue. The Project would also renovate the existing building at 1155 N. Las Palmas Avenue, change its existing use to office, and construct an approximately 695 square-foot retail and office addition on the ground floor. The Project would also retain the four existing buildings located at 1128 to 1146 N. Las Palmas Avenue and minor interior renovations are currently anticipated. No exterior renovations, change in use, or expansion of these buildings are proposed at this time. The Project would provide 213 vehicular parking spaces and 26 bicycle spaces. The Project would provide 81,682 square feet of new development with 41,728 square feet of existing development to remain, for a total of 123,410 square feet of floor area, resulting in a Floor Area Ratio (FAR) of approximately 1.38 to 1. Project construction would be approximately 20 months, with construction beginning the first quarter of 2023 and final construction ending in the fourth quarter of 2024. Construction activities would be undertaken in four main steps: (1) demolition; (2) grading, excavation, site preparation, and foundations; (3) building construction and paving; and (4) finishing and architectural coatings. Construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 A.M. to 9:00 P.M. Monday through Friday, and between 8:00 A.M. and 6:00 P.M on any Saturday or national holiday. No construction activities are permitted on Sundays.

The Project would include approximately 51,800 cubic yard of export and approximately 150 truck trips will be required for export.

There are five existing trees on the Project Site and one street tree on N. McCadden Place and as proposed, the Project proposes to remove the one on-site tree and one street tree on the western portion of the Project Site and provide a total of 13 trees in the western portion of the Project Site.

The Project assumes a worst-case scenario of removing all street trees, in the event there are changes to the right-of-way improvement plans after approval of the environmental clearances. However, this environmental analysis does not authorize the removal of any street trees without prior approval of Urban Forestry, in compliance with LAMC Sections 62.169 and 62.170 and their applicable findings.

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

INITIAL STUDY

Prepared For:
The City of Los Angeles
Department of City Planning

Prepared By:
Kimley-Horn and Associates, Inc.

Applicant:
Las Palmas Avenue Owner, LLC

May 2023

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1 INTRODUCTION

An application for the proposed 1151 N. Las Palmas Avenue Project (Project) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles, as Lead Agency, has determined the Project is subject to the California Environmental Quality Act (CEQA) and that the preparation of an Initial Study is required. This Initial Study (IS) evaluates the potential environmental effects that could result from the construction, implementation, and operation of the proposed Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code 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. This Initial Study is intended as an informational document, which is 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 AND SCOPE OF THE INITIAL STUDY

The California Environmental Quality Act was enacted in 1970 with several basic purposes: (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 application for the proposed project has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the project is subject to CEQA, and the preparation of an Initial Study is required.

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 concludes that the Project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report should be prepared; otherwise, the Lead Agency may adopt a Negative Declaration or a Mitigated Negative Declaration.

This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006).

1.2 REPORT ORGANIZATION

This document has been organized into the following sections:

Section 1.0 – Introduction. This section provides an introduction and overview describing the conclusions of the Initial Study.

Section 2.0 – 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.

Section 3.0 – Project Description. This section identifies key Project characteristics and includes a list of anticipated discretionary actions.

Section 4.0 – Environmental Evaluation. Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project. This Section also includes mitigation measures that will be implemented to reduce impacts to less than significant levels. In accordance with Public Resources Code Section 21064.5 and CEQA Guidelines Sections 15064(f)(2) and 15070(b), the mitigation measures contained in Section 4, below have been agreed to by the Applicant.

1.3 CEQA PROCESS

In compliance with the State CEQA Guidelines, the City, as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. As described below, an effort will be made to inform, contact, and solicit input on the Project from various government agencies and the general public, including stakeholders and other interested parties. At the onset of the environmental review process, the City has prepared this Initial Study to determine if the Project may have a significant effect on the environment. This Initial Study determined that with implementation of mitigation, agreed to by the Applicant, the Project would not have a significant effect(s) on the environment and a MND will be appropriate for the Project. As set forth in Section 15072 of the CEQA Guidelines, the City, as the Lead Agency for the Project, will provide a notice of intent to adopt an MND to the public, responsible agencies, trustee agencies, and the county clerk to allow the public and agencies to review the proposed MND. Pursuant to Section 15105 of the CEQA Guidelines, the public review period for a proposed Negative Declaration or MND shall be not less than 20 days (or 30 days when a proposed Negative Declaration or MND is submitted to the State Clearinghouse for review by state agencies.

2 EXECUTIVE SUMMARY

PROJECT TITLE	1151 N. Las Palmas Avenue Project
ENVIRONMENTAL CASE NO.	ENV-2021-10480-MND
RELATED CASES	ZA-2021-10479-CU-SPR
PROJECT LOCATION	1128-1146 N. Las Palmas Avenue, 1139-1155 N. Las Palmas Avenue, and 1138-1150 N. McCadden Place
COMMUNITY PLAN AREA	Hollywood Community Plan
GENERAL PLAN DESIGNATION	Limited Manufacturing
ZONING	[Q]M1-1VL-SN
COUNCIL DISTRICT	13
LEAD AGENCY	**City of Los Angeles**
CITY DEPARTMENT	Planning Department
STAFF CONTACT	Dylan Lawrence
ADDRESS	200 N. Spring Street, Room 621
PHONE NUMBER	213-978-1182
EMAIL	dylan.lawrence@lacity.org
APPLICANT	Las Palmas Avenue Owner, LLC
ADDRESS	1015 N Fairfax Ave, West Hollywood, CA 90046
PHONE NUMBER	(323) 461-8815

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by the Project. The impacts for each of these environmental factors would be less than significant with implementation of the mitigation measures included in this MND.

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

DETERMINATION:

On the basis of this initial evaluation (check one):

☐ 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 in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

☐ I find that 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 the 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.

CERTIFICATION:

Dylan Lawrence	City Planning Associate
PRINTED NAME	**TITLE**
	5/25/23
SIGNATURE	**DATE**

Evaluation of Environmental Impacts:

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

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

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

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

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

    2) 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.

    3) 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:

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

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

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The 1151 N. Las Palmas Avenue Project (the Project) proposes the construction of a new creative office building and the renovation, expansion, and change of use of an existing manufacturing building on an 89,752-square-foot site located in the Hollywood Community Plan area at 1128-1146 N. Las Palmas Avenue, 1139-1155 N. Las Palmas Avenue, and 1138-1150 N. McCadden Place (Project Site) in the City of Los Angeles (the City).

The Project would demolish the existing 45,000-square-foot parking lot and construct a three-story, approximately 45-foot tall (50-foot tall to the top of the parapet), 80,987 square-foot, creative office building with a three-level subterranean garage at 1139-1149 N. Las Palmas Avenue. The Project would also renovate the existing building at 1155 N. Las Palmas Avenue, change its existing use to office, and construct an approximately 695 square-foot retail and office addition on the ground floor. The Project would also retain the four existing buildings located at 1128 to 1146 N. Las Palmas Avenue and minor interior renovations are currently anticipated. No exterior renovations, change in use, or expansion of these buildings are proposed at this time. The Project would provide 213 vehicular parking spaces and 26 bicycle spaces. The Project would provide 81,682 square feet of new development with 41,728 square feet of existing development to remain, for a total of 123,410 square feet of floor area, resulting in a Floor Area Ratio (FAR) of approximately 1.38 to 1. The Project would include approximately 51,800 cubic yard of export. There are five existing trees on the Project Site and one street tree on N. McCadden Place. Four trees are located on the eastern portion of the Project Site. On the western portion of the Project Site is one on-site tree and one street tree. None of the trees are considered to be protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.[1] The Project proposes to remove the one on-site tree and one street tree on the western portion of the Project Site and provide a total of 13 trees in the western portion of the Project Site. Two new street trees would be provided along N. McCadden Place. Prior to any work on the adjacent public right-of-way, the applicant will be required to obtain approved plans from the Department of Public Works. As there currently is no approved right-of-way improvement plan and for purposes of conservative analysis under CEQA, Planning has analyzed the worst-case potential for removal of all street trees. Note that street trees and protected trees shall not be removed without prior approval of the Board of Public Works/Urban Forestry (BPW) under LAMC Sections 62.161 - 62.171. At the time of preparation of this environmental document, no approvals have been given for any tree removals on-site or in the right-of-way by BPW. The City has required a Tree Report to identify all protected trees/shrubs on the project site and all street trees in the adjacent public right-of-way.

In the event there are changes to the right-of-way improvement plans after approval of the environmental clearances. However, this environmental analysis does not authorize the removal of any street trees without prior approval of Urban Forestry, in compliance with LAMC Sections 62.169 and 62.170 and their applicable findings.

[1] Tree Evaluation Report: *1128-1146 N. Las Palmas Ave., 1139-1149 Las Palmas Ave., 1138-1140 McCadden Pl., Los Angeles, CA 90038* contained in Appendix B.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located at 1128-1146 N. Las Palmas Avenue, 1139-1555 N. Las Palmas Avenue, and 1139-1155 N. McCadden Place within the Hollywood community. The Project Site is located mid-block between Lexington Avenue to the north and Santa Monica Boulevard to the south, fronting N. McCadden to the west. N. Las Palmas Avenue runs north-south through the Project Site, separating 1139-1155 N. Las Palmas Avenue and 1138-1150 N. McCadden Place in the western portion from 1128-1146 N. Las Palmas Avenue in the eastern portion (**Figure 1:** *Regional and Vicinity Map* and **Figure 2:** *Aerial View of Site*). As shown in **Figure 3**: *Zoning and General Land Use Designation*, the Project Site has a General Plan Land Use designation of Limited Manufacturing and is currently zoned [Q]M1-1VL-SN. The M1 zone permits commercial and light industrial uses, but the Qualified Classification (Q Classification) limits the commercial uses allowed at the Project Site to those permitted in the C4 zone, including office, retail and restaurant uses. The Height District 1VL designation imposes a height limitation of three stories or 45 feet and a maximum FAR of 1.5:1. The SN designation indicates that the Project Site is located in the Hollywood Signage Supplemental Use District; however, the Project is not currently proposing any new signs.

Regional vehicle access to the Project Site is provided by the 101 Freeway, located approximately 1.72 miles east of the Project Site. Local vehicle access to the Project Site is provided via Santa Monica Boulevard and Lexington Avenue. The Project Site is within close proximity to several transit options. It is approximately 0.7 miles from the Hollywood and Highland Metro Station which serves the B Line (formally the Red Line) of the Metro Rail System. Numerous bus lines also serve the Project Site, including Metro bus lines 224 and 4 and the DASH Hollywood line.

3.2.2 Existing Conditions

The Project Site is comprised of eight parcels with the following Assessor Parcel Numbers (APN): 5532-021-003, 004, 005, 014, 015, 016, 017, 5532-022-003, 004, 005, and 006. As shown in **Figure 4:** *Existing Site Photos*, the Project Site includes two locations with N. Las Palmas Avenue bisecting the lots. The western portion of the Project Site is currently developed with a one-story, 30-foot-tall manufacturing building and a surface parking lot. The eastern portion of the Project Site is currently developed with four office buildings ranging from one- to two stories and 27 to 30 feet tall.

Currently, the Project Site contains landscape vegetation and five on-site trees, consisting of four Queen palms (Syagrus romanzoffiana) and one Mexican fan palm (Washingtonia robusta), as well as one Callery pear (Pyrus calleryana) street tree. None of the five existing on-site or one street tree on N. McCadden Place is a protected species or heritage tree.[2]

As shown in **Figure 5**, *Surrounding Land Uses*, nearby land uses are comprised of multi-family residential, industrial, commercial, and community facility uses. Nearby structures vary in building style and materials.

- **North:** To the north, is Ferguson Plumbing Supply, an office building, a Certified Car Parts auto shop, KT Image photo lab, and Lexington Avenue. Residential uses are located north of Lexington Avenue.

[2] Tree Evaluation Report: *1128-1146 N. Las Palmas Ave., 1139-1149 Las Palmas Ave., 1138-1140 McCadden Pl., Los Angeles, CA 90038* contained in **Appendix B.**

- **East:** To the east, are office, warehouse, distribution uses, and the AVA Hollywood residential building.
- **South:** The lots directly to the south include the AVA Hollywood residential building and the five-story Los Angeles LGBT Anita May Rosenstein Center mixed-use development that includes office, commercial, and residential uses.
- **West:** The lots directly to the west across N. McCadden Place, include one- to two-story office uses and warehouses. Also located to the west, is the Village at Ed Gould Plaza/Los Angeles LGBT Center and office/production uses.

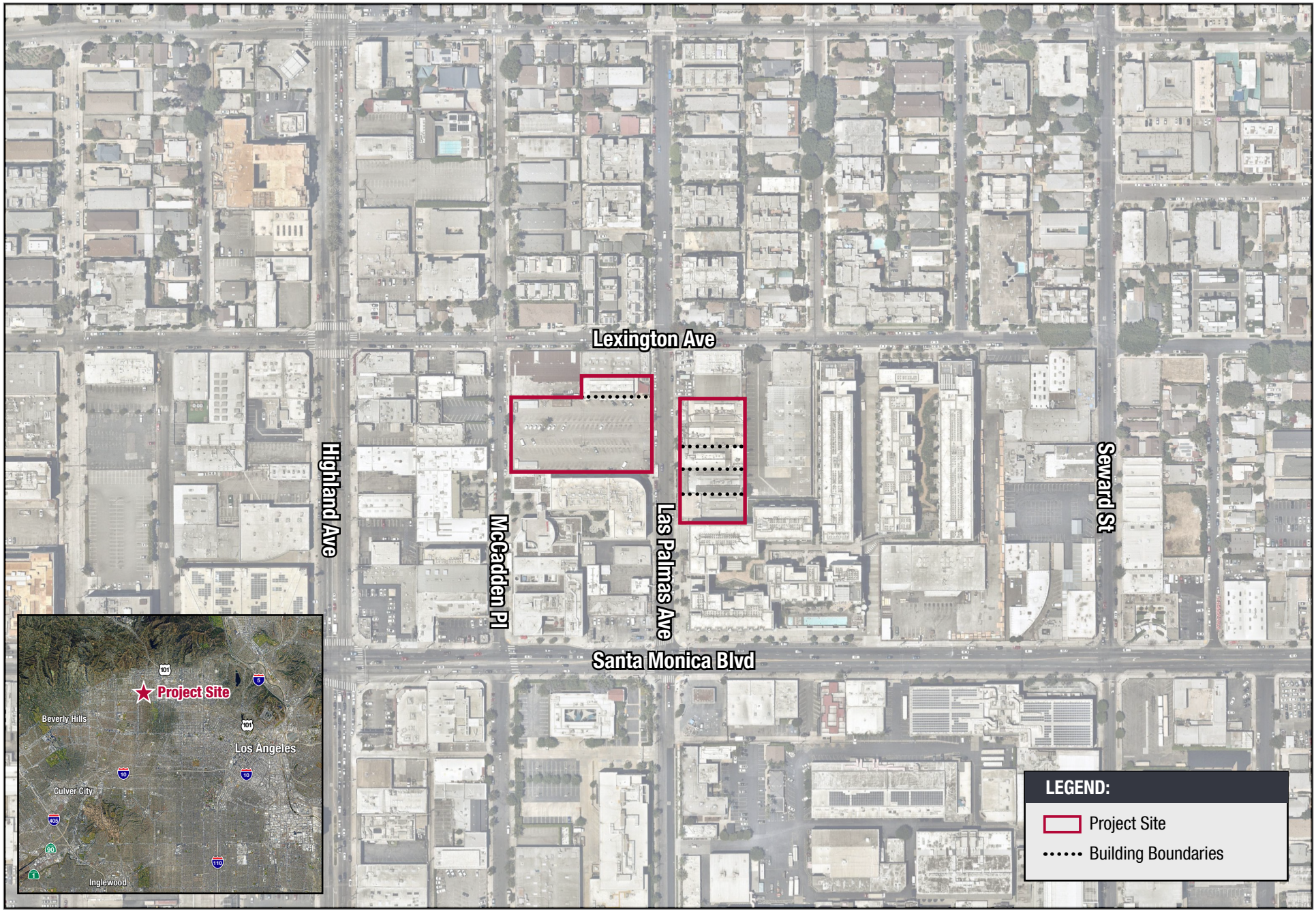
3.3 DESCRIPTION OF THE PROJECT

3.3.1 Project Overview

The Project would demolish the existing 45,000-square-foot parking lot and surrounding metal fence and construct a three-story, approximately 45-foot tall (50-foot tall to the top of the parapet), 80,987-square-foot, creative office building with a three-level subterranean garage at 1139-1149 N. Las Palmas Avenue (Building A). The Project would also renovate the existing 5,498-square-foot building at 1155 N. Las Palmas Avenue, expand its ground-floor by 695 square-feet, and change its use from manufacturing to office and retail (Building B). Four existing office buildings at 1128-1146 N. Las Palmas Avenue (Buildings C-F) would be retained with no Project activities proposed for these buildings.

As shown in **Table 1**: *Project Development Summary*, the Project would retain approximately 41,728 square-feet of existing building space and construct an additional 81,682 square-feet of building space, which would result in a total of 123,410 square-feet of building space at the Project Site, comprised of 123,275 square-feet of office and/or production space and 135 square-feet of retail space. The proposed new Building A would contain office and production uses, while additional office uses would be contained within the existing/expanded Building B and Buildings C-F. The retail use would be contained within 135 square-feet of the proposed 695 square-foot expansion space in Building B and would be located on the ground floor between the current Building B footprint and N. Las Palmas Avenue.

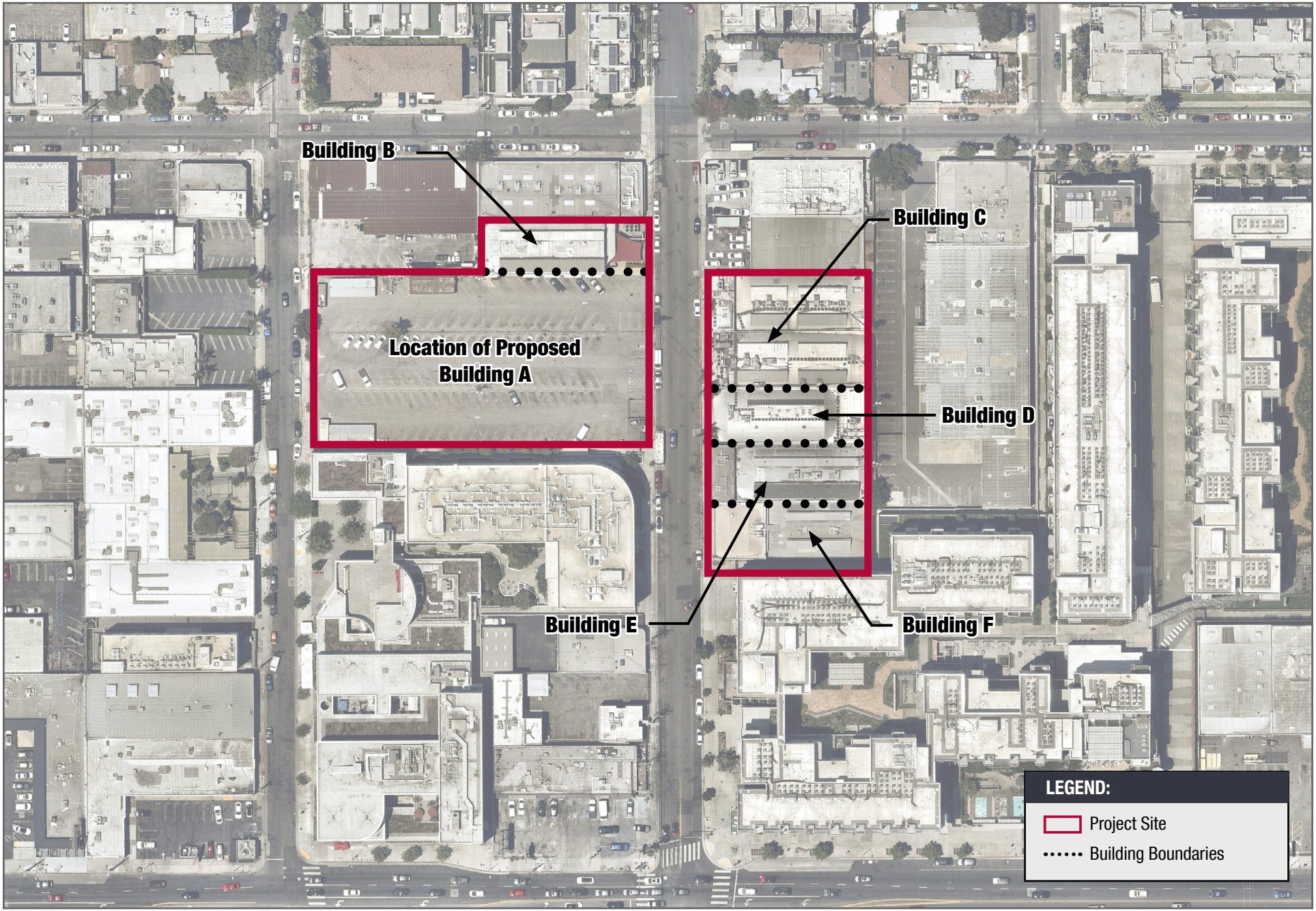
Figure 6 through **Figure 12** depict the proposed floor plans of Building A and **Figure 13,** and **Figure 14** depict proposed elevations.



Source: Google Earth, 2022

FIGURE 1: Regional and Vicinity Map
1151 Las Palmas

Kimley»Horn



Source: Nearmap, 2022

FIGURE 2: Aerial View of Site
1151 Las Palmas

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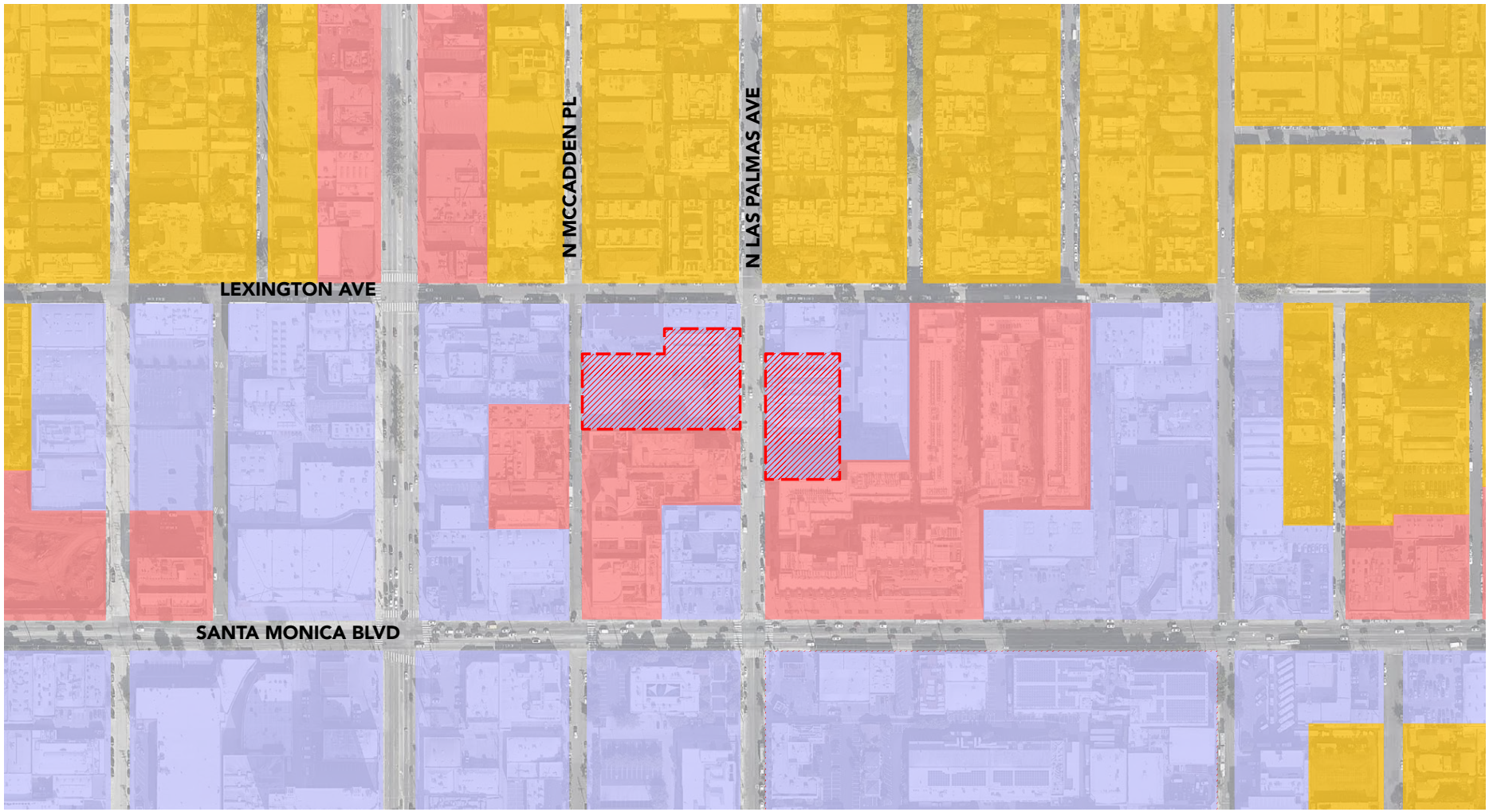

Source: House & Robertson Architects, December 2022

FIGURE 3: Zoning and General Land Use Designation
1151 Las Palmas

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1. VIEW FROM LAS PALMAS LOOKING NORTH

2. VIEW FROM LAS PALMAS LOOKING SOUTH

3. VIEW FROM MCCADDEN LOOKING NORTH

4. VIEW FROM MCCADDEN LOOKING SOUTH

Source: House & Robertson Architects, December 2022

FIGURE 4: Site Photos
1151 Las Palmas

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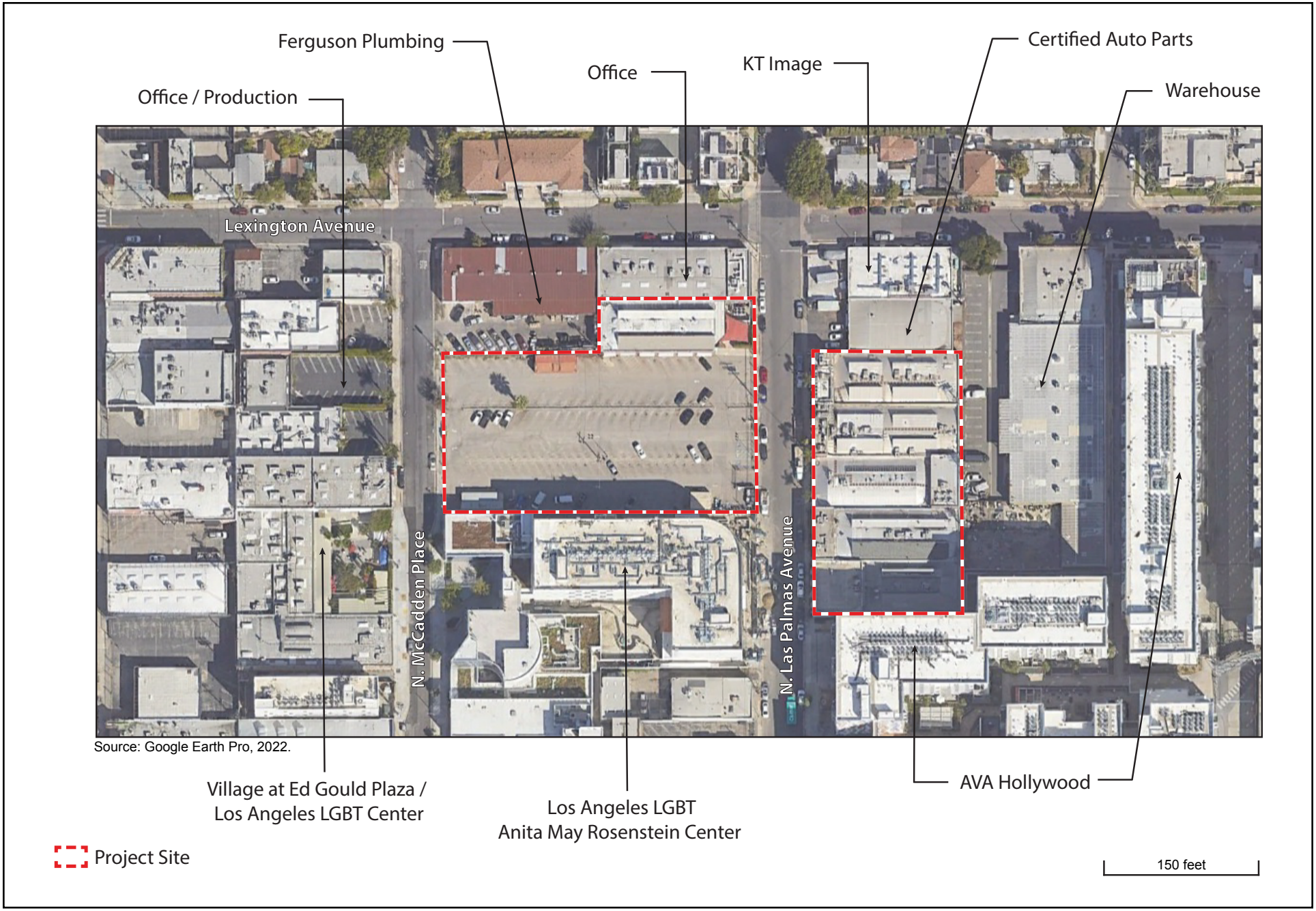

Source: House & Robertson Architects, December 2022

FIGURE 5: Surrounding Uses
1151 Las Palmas

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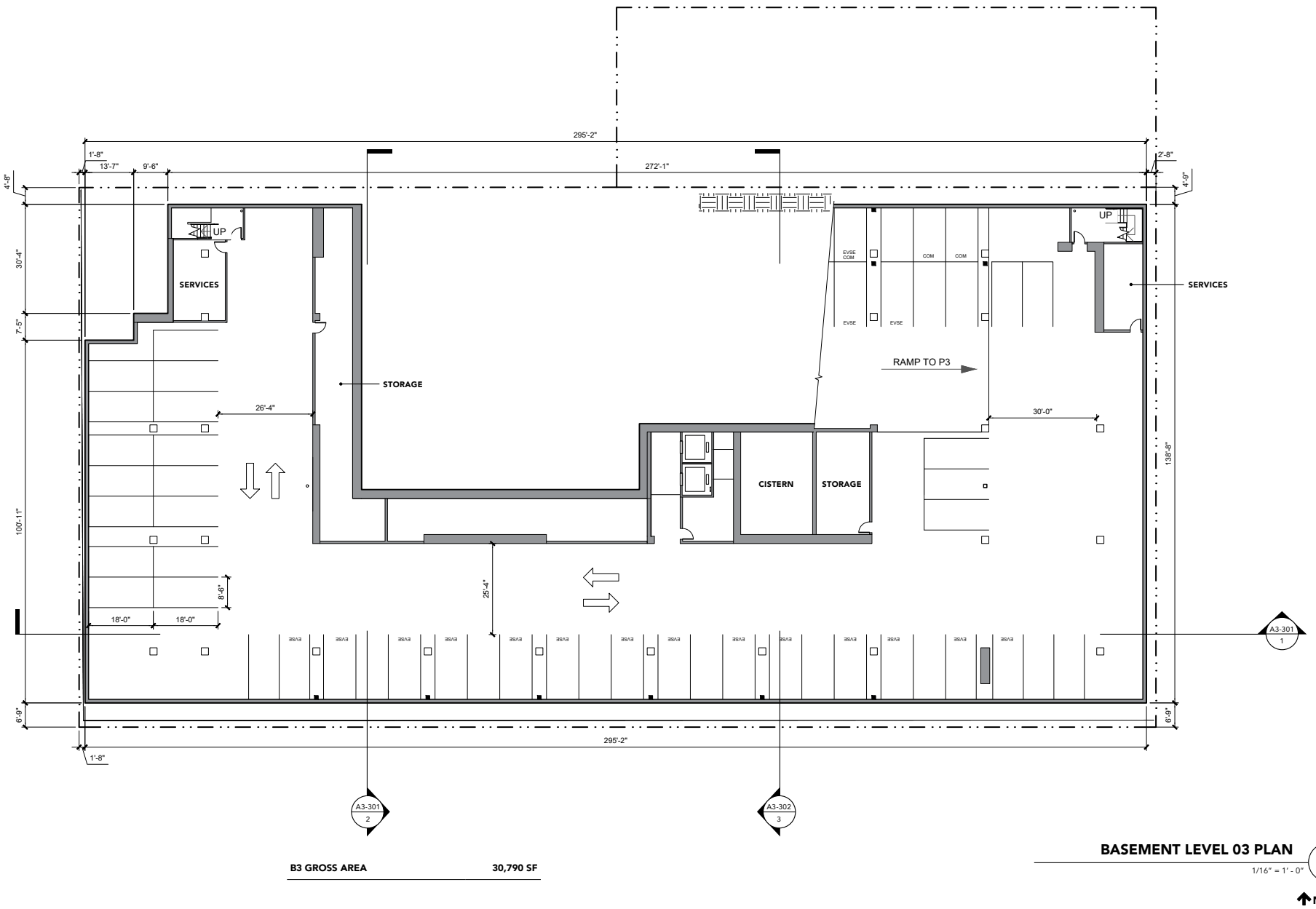

Source: House & Robertson Architects, December 2022

FIGURE 6: Subterranean Level 3
1151 Las Palmas

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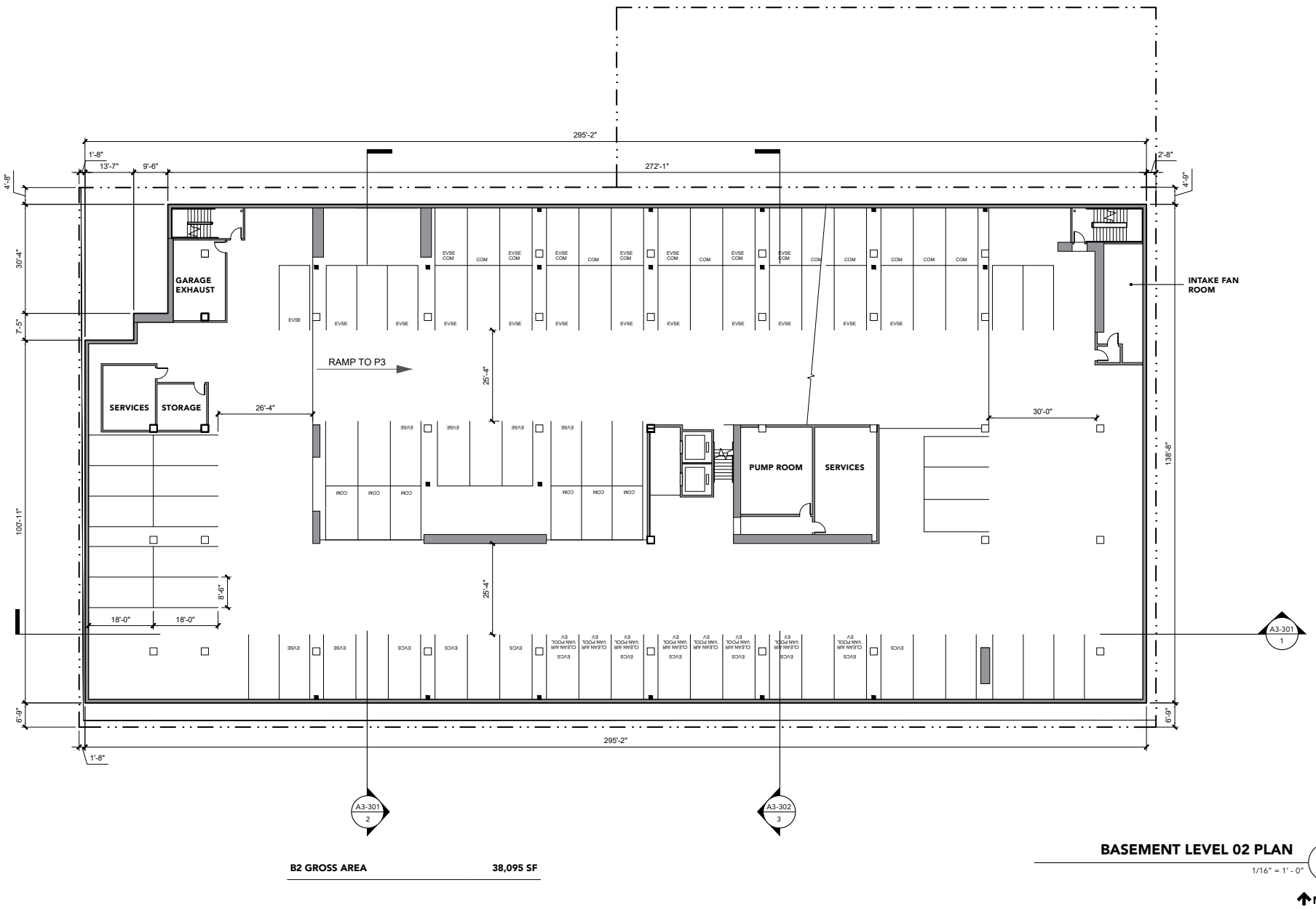
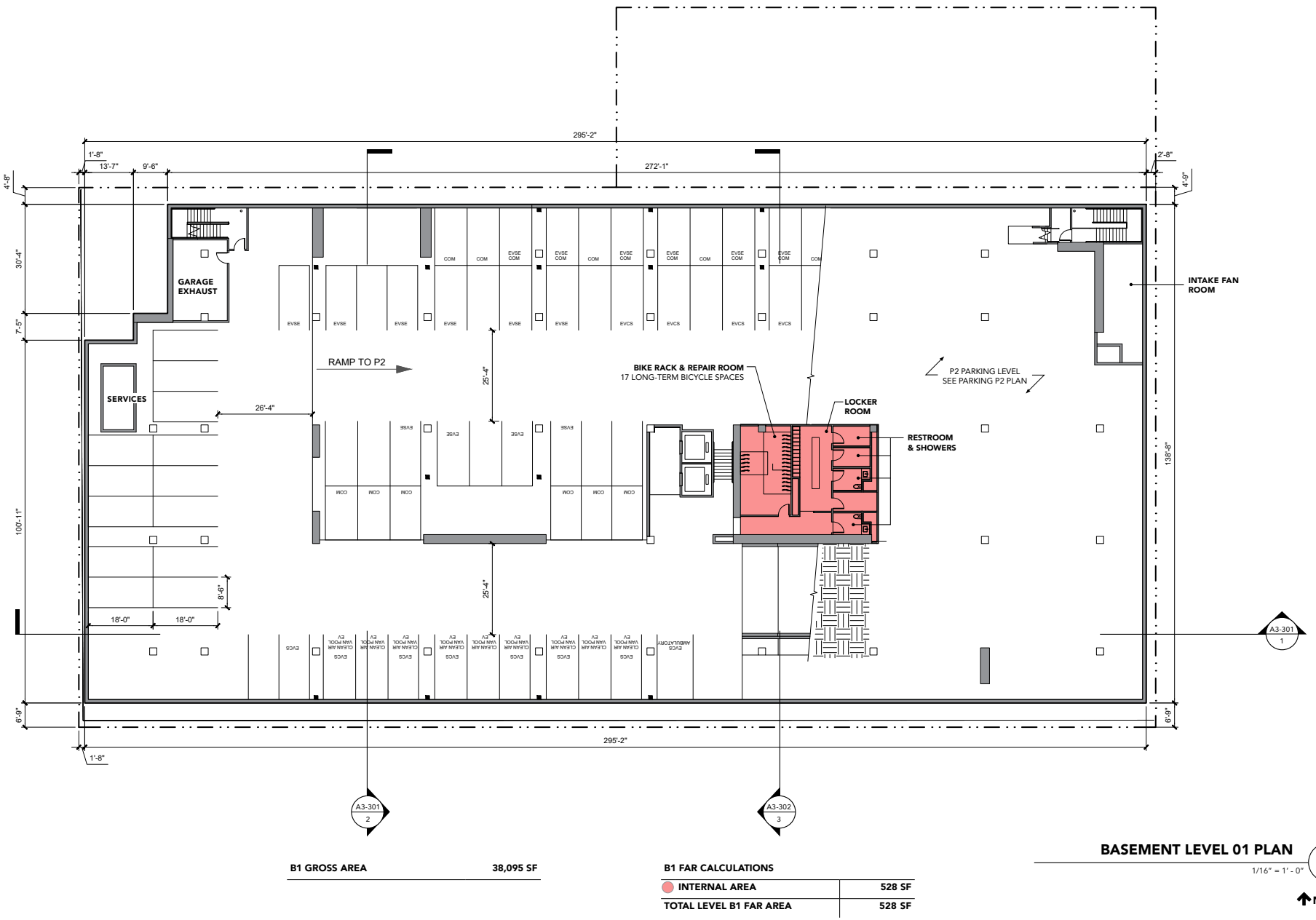


Source: House & Robertson Architects, December 2022

FIGURE 7: Subterranean Level 2
1151 Las Palmas



Source: House & Robertson Architects, December 2022

FIGURE 8: Subterranean Level 1
1149 Las Palmas

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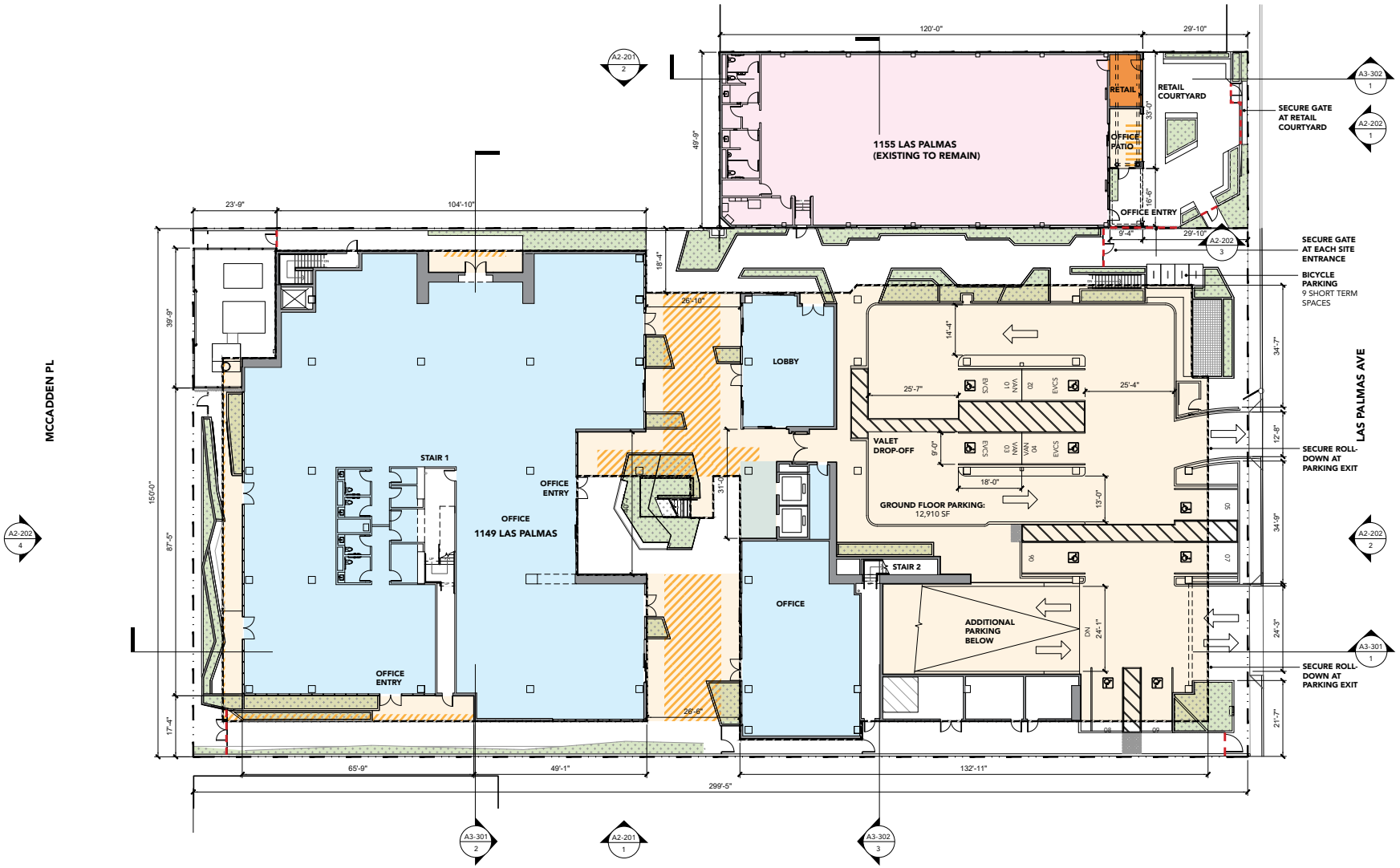


1F FAR CALCULATIONS 1155 LAS PALMAS	
INTERNAL AREA RETAIL	135 SF
INTERNAL AREA OFFICE	6,058 SF
TOTAL LEVEL 1F FAR AREA	6,193 SF

1F FAR CALCULATIONS 1149 LAS PALMAS	
INTERNAL AREA OFFICE	15,311 SF
COVERED EXTERIOR AREA	3,640 SF
TOTAL LEVEL 1F FAR AREA	18,951 SF

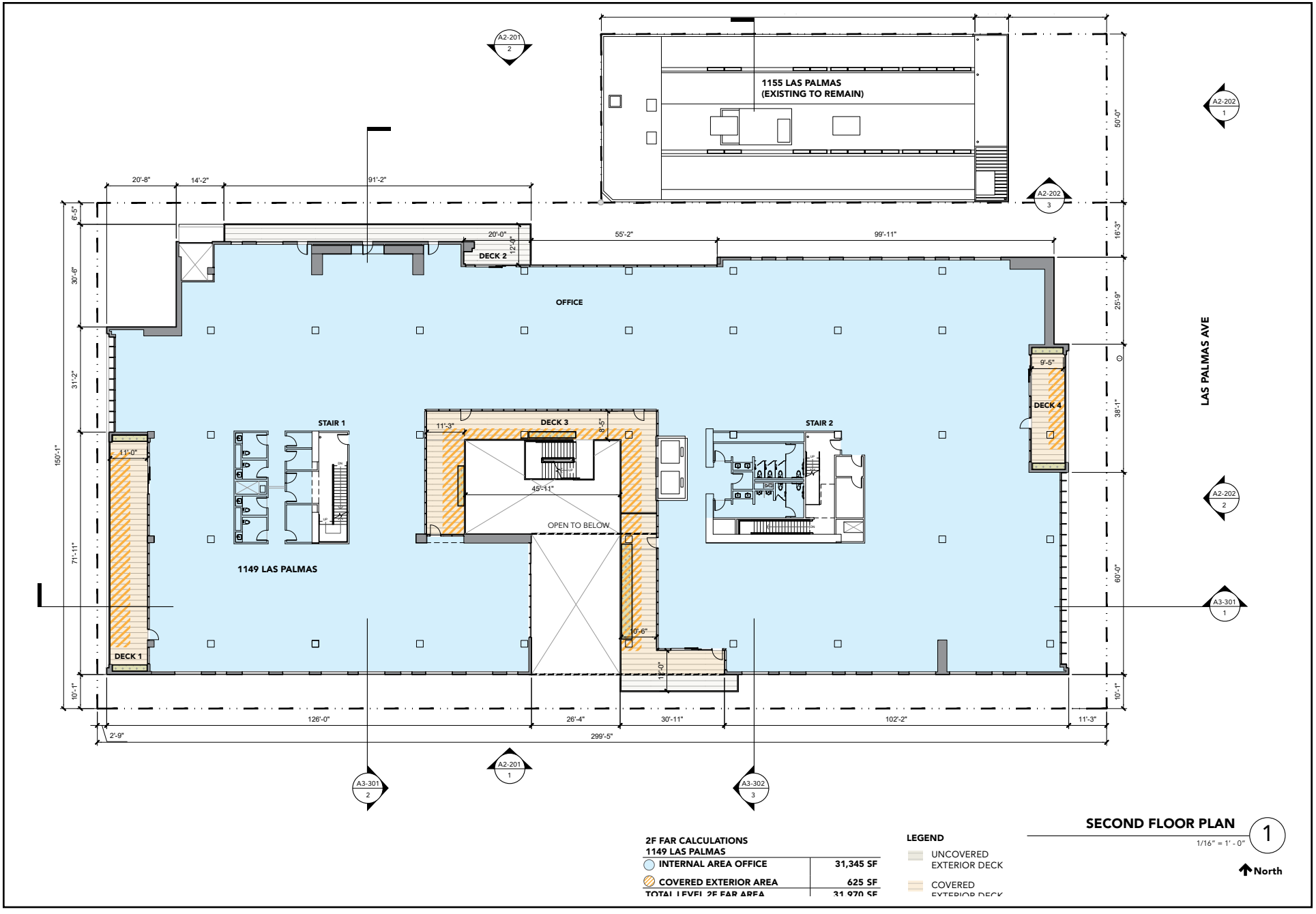
LEGEND
- WALLS TO BE DEMOLISHED
- COVERED EXTERIOR SPACE

FIRST FLOOR PLAN 1
1/16" = 1' - 0"
North

Source: House & Robertson Architects, December 2022

FIGURE 9: First Floor Plan
1149 Las Palmas

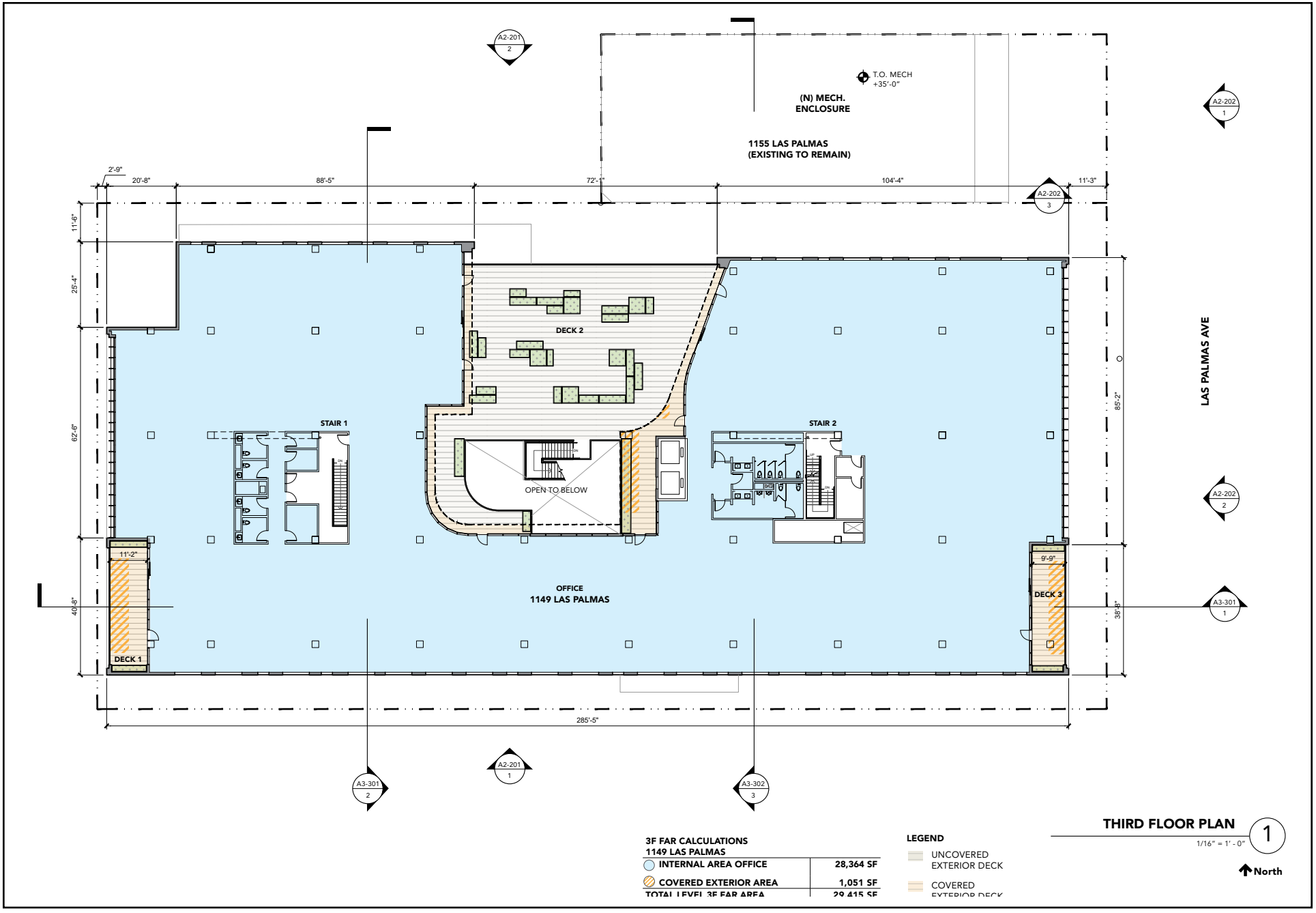
Kimley»Horn



Source: House & Robertson Architects, December 2022

FIGURE 10: Second Floor Plan
1151 Las Palmas

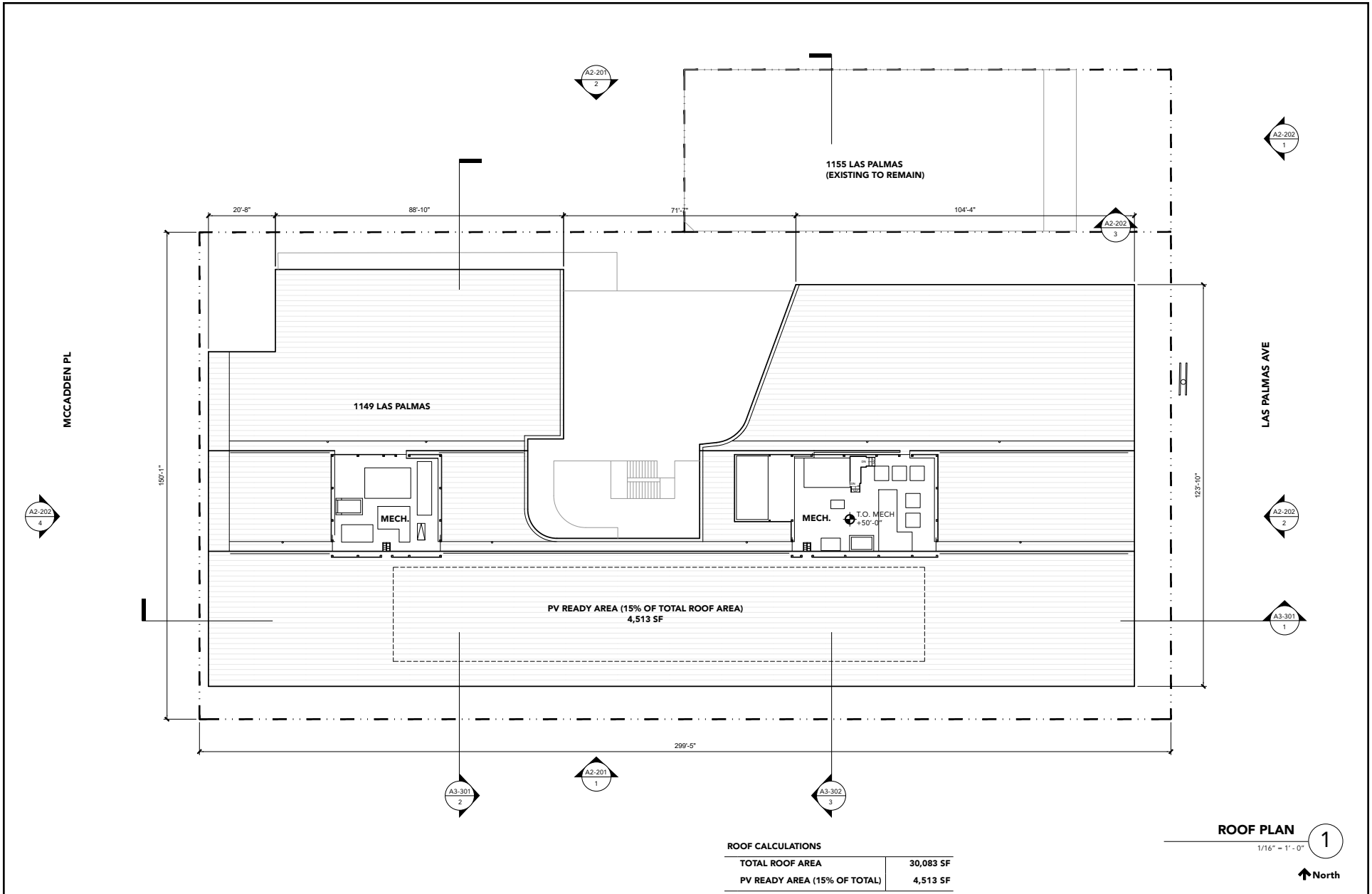
Kimley»Horn



Source: House & Robertson Architects, December 2022

FIGURE 11: Third Floor Plan
1151 Las Palmas

Kimley»Horn



ROOF CALCULATIONS

TOTAL ROOF AREA	30,083 SF
PV READY AREA (15% OF TOTAL)	4,513 SF

ROOF PLAN 1

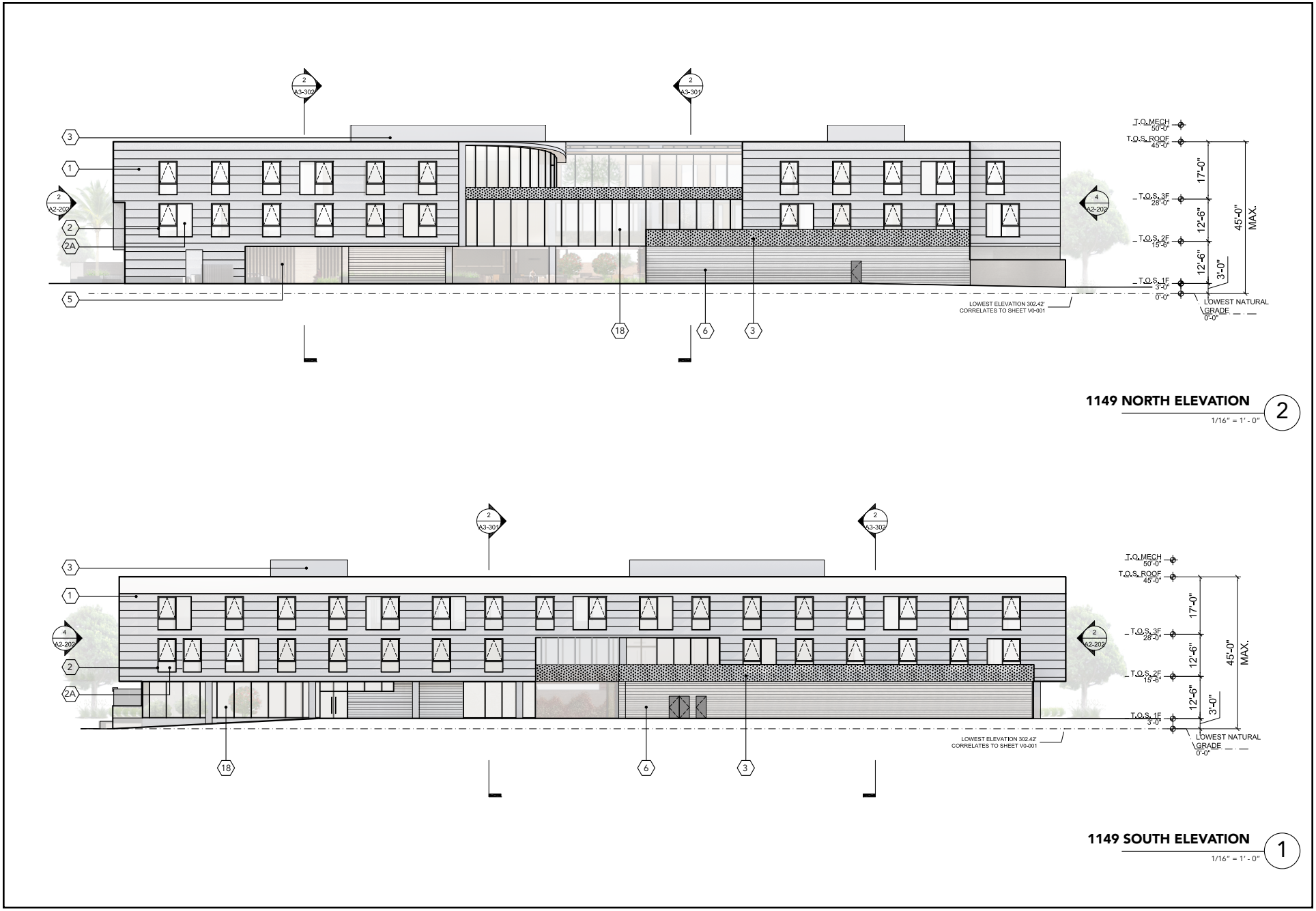
1/16" = 1' - 0"

North

Source: House & Robertson Architects, December 2022

FIGURE 12: Roof Plan
1151 Las Palmas

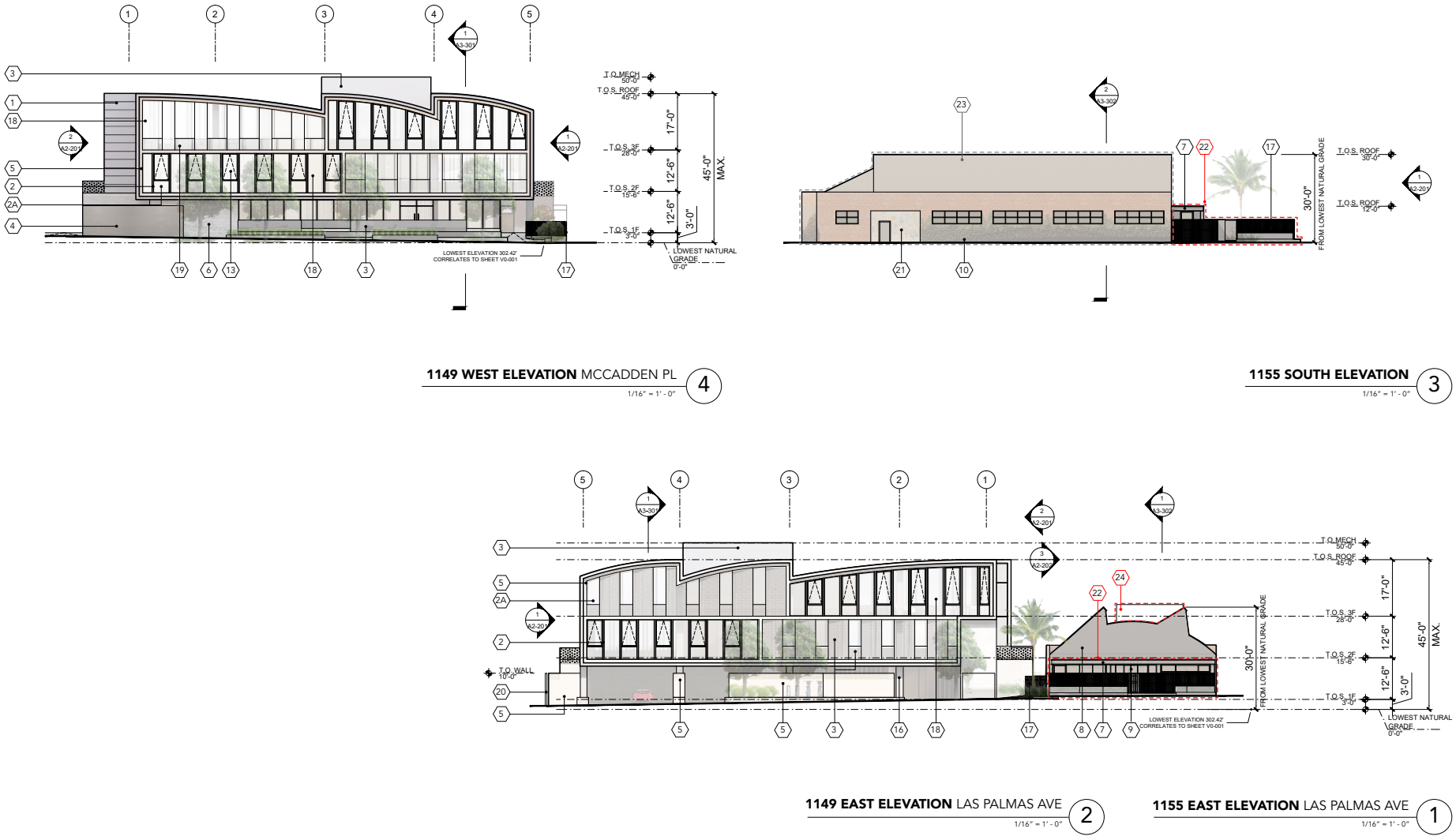
Kimley»Horn



Source: House & Robertson Architects, December 2022

FIGURE 13: North and South Elevations
1151 Las Palmas

Kimley»Horn



Source: House & Robertson Architects, December 2022

FIGURE 14: East and West Elevations
1151 Las Palmas

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Table 1: Project Development Summary

Address	Existing Building Area (SF)	Proposed Building Area and Use (SF)	Net New Building Area
Proposed New Building			
1149 Las Palmas (Building A)	0	Office/ Production: 80,987 sf	80,987 sf
Existing Building Proposed Expansion & Change of Use			
1155 Las Palmas (Building B)	5,498 sf	Office: 6,058 sf Retail: 135 sf	695 sf
Existing Buildings to Remain			
1144-1148 Las Palmas (Building C)	11,570 sf	Office/ Production: 11,570 sf	0
1138 Las Palmas (Building D)	9,560 sf	Office/ Production: 9,560 sf	0
1134-1136 Las Palmas (Building E)	8,050 sf	Office/ Production: 8,050 sf	0
1128 Las Palmas (Building F)	7,050 sf	Office/ Production: 7,050 sf	0
Total Existing	41,728 sf		
Total To Remain	41,728 sf		
Total Net New	81,682 sf		
Project Total Existing and New	**123,410** sf		

Source: Bardas Investment Ground, Otherworks, House & Robertson Architects, and KSA Inc., Landscape Studio, 1149 Las Palmas Entitlements Master Plans, December 2022.

Zoning and Floor Area

The Project Site is currently zoned [Q]M1-1VL-SN and is located within the Hollywood Community Plan Area, which designates the land use of the property as Limited Manufacturing. The M1 zone permits commercial and light industrial uses. The Qualified Classification (Q Classification) was adopted by the City Council in 1989 with Ordinance Number 164,704, and limits the commercial uses allowed at the Project Site to those permitted in the C4 zone, which include office, retail, and restaurant uses. The M1 zone has an unlimited height, but the Height District No. IVL restricts the height of development to 45 feet, three stories, and a FAR of 1.5:1.

The proposed floor area per building is shown in **Table 2:** *Project Floor Area and FAR Summary*. The Project would result in a total floor area of 123,410 square-feet, an increase of 81,682 square-feet of floor area. With a total lot area of 89,752 square-feet, the Project would result in a FAR of 1.38:1.

Table 2: Project Floor Area and FAR Summary

Building	Existing Floor Area	Proposed Interior Floor Area	Proposed Exterior Covered Floor Area	Net New Floor Area	Total Proposed Floor Area
Proposed New Building					
Building A	N/A				
P3		N/A	N/A	N/A	N/A
P2		N/A	N/A	N/A	N/A
P1		528 sf	N/A	528 sf	528 sf
1F Office		15,340 sf	3,640 sf	18,980 sf	18,980 sf
2F Office		31,394 sf	625 sf	32,019 sf	32,019 sf
3F Office		28,409 sf	1,051 sf	29,460 sf	29,460 sf
Subtotal New Building	*N/A*	*75,671sf*	*5,316 sf*	80,987 *sf*	80,987 *sf*
Existing Buildings					
Building B	5,498 sf	6,193 sf	0 sf	695 sf	6,193 sf
Building C	11,570 sf	11,570 sf	0 sf	0 sf	11,570 sf

Building	Existing Floor Area	Proposed Interior Floor Area	Proposed Exterior Covered Floor Area	Net New Floor Area	Total Proposed Floor Area
Building D	9,560 sf	9,560 sf	0 sf	0 sf	9,560 sf
Building E	8,050 sf	8,050 sf	0 sf	0 sf	8,050 sf
Building F	7,050 sf	7,050 sf	0 sf	0 sf	7,050 sf
Subtotal Existing Buildings	*41,728 sf*	*42,423 sf*	*0 sf*	*695 sf*	*42,423 sf*
Total Project Floor Area	***41,728 sf***	***118,094 sf***	***5,316 sf***	***81,682 sf***	***123,410 sf***

ft = feet; sf = square-feet
Source: Bardas Investment Ground, Otherworks, House & Robertson Architects, and KSA Inc., Landscape Studio, 1149 Las Palmas Entitlements Master Plans, December 2022.

Design and Architecture

The three-story new office building (Building A) to be constructed will feature curved, layered roofing and will incorporate a modern architectural design. Building B is currently designed with a stylistic, modern sculpted roof which will be preserved. The one-story retail/office addition would be constructed in front of the existing Building B and a retail courtyard is proposed in front of the new one-story addition.

The exterior facade of Building A would echo Building B's existing design and would feature a curved roof to increase the availability of natural light within the building. Glass panels, simulated wood, perforated metal railings, and concrete panels would be used to reflect the industrial history of the Project Site and create a facade architecturally consistent with Building B and Buildings C through F. Renovations to the exterior of Building B would also incorporate contemporary glass and metal facades utilizing the same neutral color palette as Building A. Proposed design materials can be seen in **Figure 15**.

The Project's design, massing, and height are designed to be compatible with the neighboring one- to six-story commercial and residential uses. The placement of the entrances to the Project Site along N. Las Palmas Avenue, away from the more heavily trafficked Santa Monica Boulevard, enhances pedestrian walkability and safety at the interior portion of the Project Site. Additionally, the concentration of activity along N. Las Palmas Avenue helps to integrate the Project Site on both the eastern and western sides of Las Palmas.

Open Space and Landscaping

The Project would not be open to the public; therefore, no open space requirements would apply to the Project. However, the Project would provide 22,056 square-feet of private open space for the proposed tenants of Building A as part of its design intended to promote worker well-being and enjoyment and attract/retain media-focused tenants in Hollywood. This private open space would include 13,245 square-feet of courtyard and seating areas on the ground floor, 3,244 square-feet of decks on the 2nd floor, and 5,567 square-feet of terrace and decks on the 3rd floor.

The Project would also provide 5,127 square-feet of landscaped area for Building A, including 4,100 square-feet of softscape planting area. As shown in **Figure 16** through **Figure 18**, the softscape planting areas would be located throughout the courtyard, terrace, decks, pedestrian entryways, and perimeter of Building A, and would contain a variety of low-growth shrubs, bushes, and plants. Renderings of the Project are shown in **Figures 20** through **22.**

There are five existing trees on the Project Site and one street tree on N. McCadden Place. Four Queen Palms (Syagrus romanzoffiana) are located on the eastern portion of the Project Site along the east side of N. Las Palmas in front of Buildings C-F. The Project would maintain the four Queen Palms on the eastern portion of the Project Site. On the western portion of the Project Site is one on-site Mexican fan palm (Washingtonia robusta) and one street tree: a Callery pear (Pyrus calleryana). None of the trees are considered to be protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873. Furthermore, any removal of street trees would require approval from the City of Los Angeles Bureau of Street Services.

The Project proposes to remove the one on-site tree and one street tree on the western portion of the Project Site and provide a total of 13 trees in the western portion of the Project Site. These trees would include the following: four Peppermint Willows (*Agonis Flexuosa*), one Cootamundra Wattle *(Acacia Bailyena*), and one Brisbane Box (*Lophostemon Confertus*) at the ground level and five Manzanita Trees (*Arctostaphylos Manzanita*) on 3rd floor terrace of Building A. Two new street trees would be provided along N. McCadden Place to the satisfaction of the Urban Forestry Division, Bureau of Street Services requirements for a 2:1 ratio.

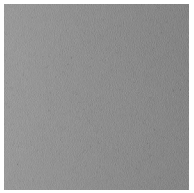
SUSTAINABLE FEATURES

The project will include enhanced energy-efficiency via high-performance glazing as well as enhanced façade, roof and deck insulation values. The air conditioning system will be comprised of highly efficient Variable Refrigerant Flow systems allowing for minimal electrical consumption, particularly when the building is lightly occupied. The building systems will include enhanced filtration of outside air being delivered to the occupied areas, and operable windows and oversize folding glass walls will enhance the natural ventilation whenever weather conditions permit. Vertical circulation via the feature outdoor stair will further enhance the health and wellness of the occupants.

Water usage will be minimized via the use of ultra-low flow plumbing fixtures throughout the project. All roof, balcony and plaza deck drains will feed into a rainwater harvesting cistern, approximately 10,000-gallon capacity, to be used entirely for irrigation of the on-site landscaping.

The on-site drop-off area in the ground floor will encourage ridesharing and carpooling, while the on-site parking will include preferential parking for electric and low-emitting vehicles, and the project will provide over-code electric vehicle charging stations.

MATERIAL PALETTE

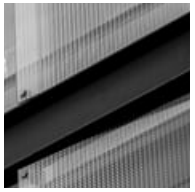

1 GFRC

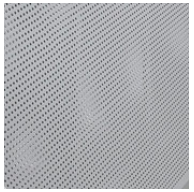

5 SIMULATED WOOD

2 ALUMINUM WINDOW FRAMES


6 BOARD FORM CONCRETE

2A HIGH PERFORMANCE GLAZING


7 PAINTED STEEL


3 PERFORMED METAL


8 PAINTED STUCCO


4 METAL PANEL


9 WOOD CLAD STOREFRONT

Source: House & Robertson Architects, December 2022

FIGURE 15: Materials
1151 Las Palmas

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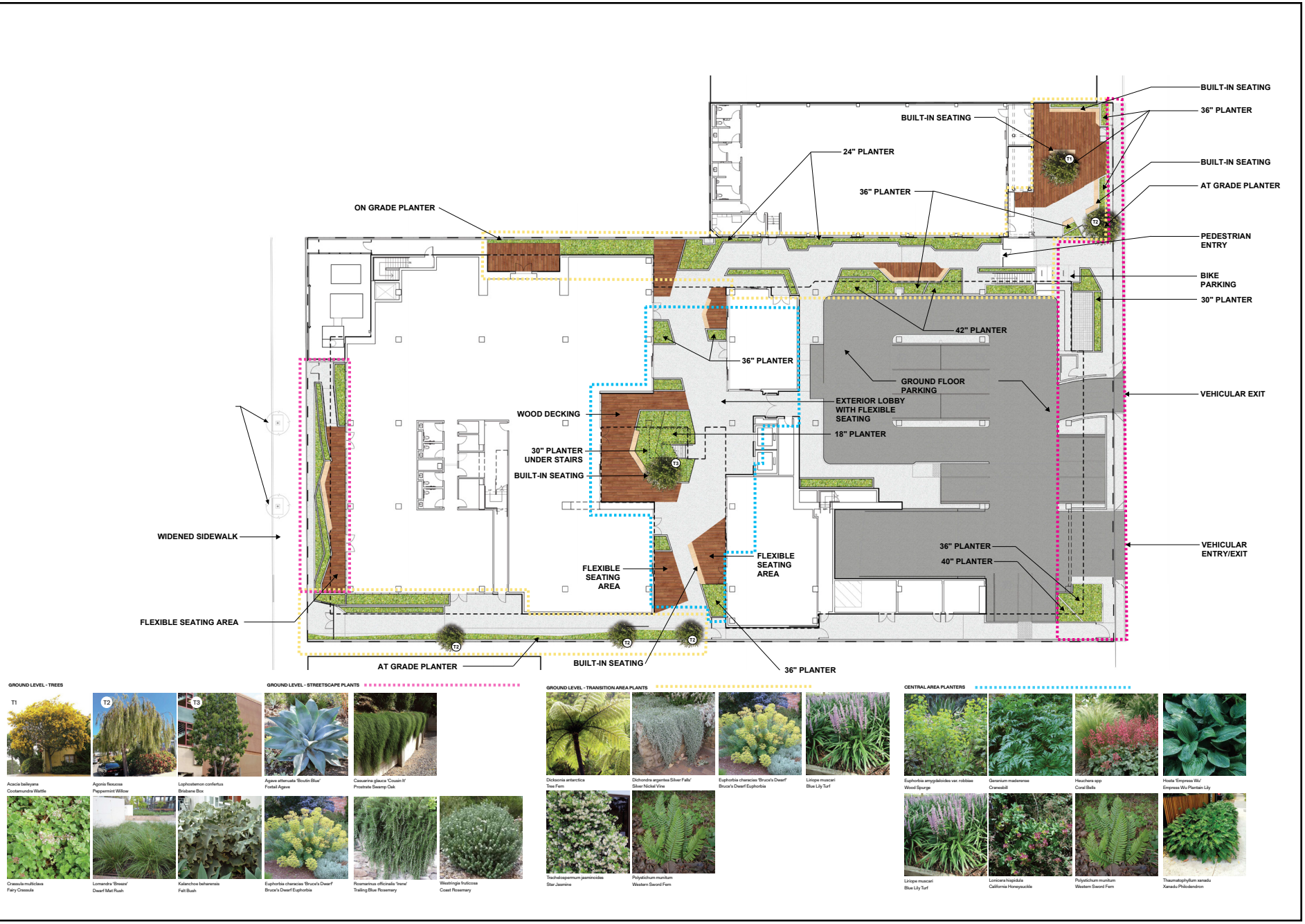

Source: House & Robertson Architects, December 2022

FIGURE 16: Planting Plan – Ground Floor
1151 Las Palmas

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Geranium maderense
Cranesbill


Westringia fruticosa
Coast Rosemary


Lonicera hispidula
California Honeysuckle


Polystichum munitum
Western Sword Fern

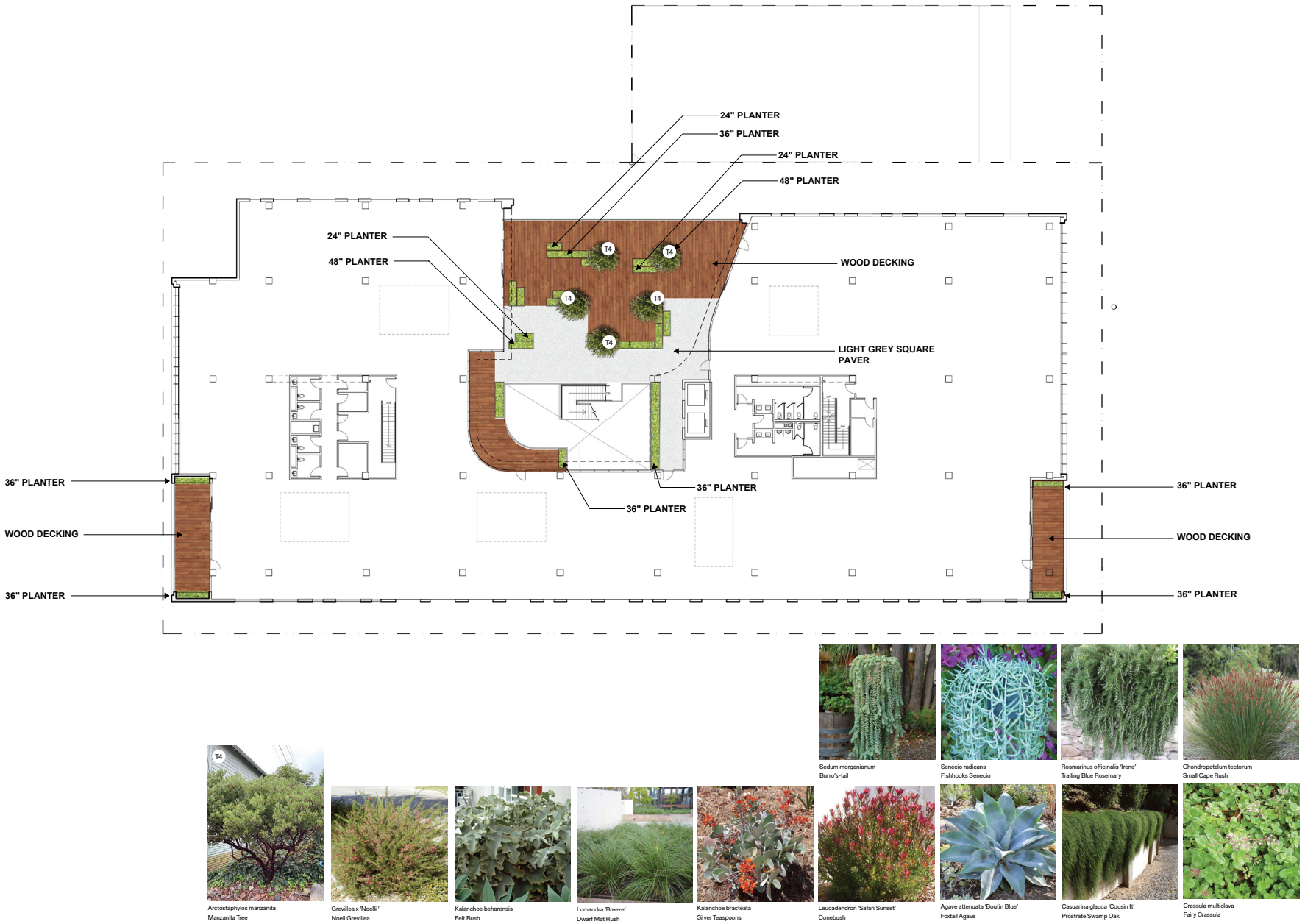

Rosmarinus officinalis 'Irene'
Trailing Blue Rosemary


Thaumatophyllum xanadu
Xanadu Philodendron

Source: House & Robertson Architects, December 2022

FIGURE 17: Planting Plan – 2nd Floor
1151 Las Palmas

Kimley»Horn



Source: House & Robertson Architects, December 2022

FIGURE 18: Planting Plan – 3rd Floor
1151 Las Palmas

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Access, Circulation, and Parking

The Project would provide access for all modes of travel, including pedestrians and cyclists. Vehicular access to the western portion of the Project Site is currently provided by three driveways each on both N. McCadden Place and N. Las Palmas Avenue. The Project proposes to close all N. McCadden Place driveways and limit all vehicular access to proposed Building A's parking garage to N. Las Palmas Avenue. As shown in **Figure 19:** *Project Circulation*, two driveways are proposed along the western side of N. Las Palmas Avenue: (1) one driveway would provide two-way entry/exit to the subterranean parking levels beneath Building A for monthly parkers and valet parking, as well as entry to the ground floor parking level; and (2) a one-way exit from the ground floor parking level for Uber, Lyft or rideshare drop off. There would also be an on-site drop-off area to serve rideshare arrivals/departures in the ground floor parking level. Existing temporary loading zones and driveways along the eastern side of N. Las Palmas associated with Buildings C-F would remain.

Pedestrian access to Building A and Building B would be shared and would be provided separately from vehicular driveways. Pedestrian access would be available from N. McCadden Place and N. Las Palmas with entrances at the southwestern corner of the Project Site along N. McCadden Place and north of the surface parking area along N. Las Palmas. Pedestrian entrances would connect via an interior courtyard on the ground floor of Building A. An additional ground-floor pedestrian courtyard would be provided for Building B in front of the proposed retail space. To further enhance pedestrian safety along N. McCadden Place, in addition to eliminating all driveways on N. McCadden Place, the Project also proposes to reconfigure N. McCadden Place to provide a wider sidewalk and a narrower roadway as the LA LGBT Center recently did directly to the south of the Project Site. The refuse collection area within Building A's ground floor garage would also be located away from pedestrians. Pedestrian access from Building A's subterranean garage to its ground floor would be provided by stairwells located at the northwestern and northeastern corners of the garage. Existing pedestrian access points to Buildings C-F directly from N. Las Palmas Avenue would be maintained.

Parking for the proposed office development would be provided on-site in a parking structure in Building A with one at-grade level and three below-grade subterranean levels. As shown in **Table 3:** *Summary of Required and Proposed Vehicular Parking Spaces*, the Project would provide 213 vehicular parking spaces, that are located and configured in compliance with applicable requirements of the LAMC. The Project would provide parking at grade level, with the balance of the parking being located in three below-grade levels accessed by internal vehicle ramps. Pursuant to the requirements of the California Green Building Standards, 21 of the vehicle parking spaces would be reserved for clean air vehicles. In addition, the Los Angeles Green Building Code requires that 30 percent of provided parking (64 spaces) for nonresidential uses be installed with electric vehicle supply equipment and 10 percent of provided parking (22 spaces) be installed with electric vehicle charging stations. The Project would install electric vehicle supply equipment in 85 parking spaces and electric vehicle charging stations in 64 parking spaces, exceeding the City's Green Building Code requirements.

Table 3: Summary of Required and Proposed Vehicular Parking Spaces

Description	Quantity	Rate	Spaces
Required			
New Building			
Office Use	80,987 sf	2 per 1,000 sf[1]	162
Existing Buildings			
1155 N. Las Palmas	5,498 sf existing office	Per C of O[2]	
	560 sf new office	2 per 1,000 sf[1]	1
Retail	135 sf	2 per 1,000 sf[1`]	1
1144-1148 N. Las Palmas	11,570 sf	2 per 1,000 sf[1]	23
1138 N. Las Palmas	9,560 sf	Per C of O[2]	2
1134-1136 N. Las Palmas	8,050 sf	2 per 1,000 sf [1] (existing)	16
1128 N. Las Palmas	7,050 sf	2 per 1,000 sf[1] (existing)	14
Required Subtotal			**219**
Bike Parking Reduction for Provision of 26 bicycle spaces[3]			*-6*
Total Parking Provided			**213**
Parking Spaces for Clean Air Vehicles[4]	21	Parking Spaces for Clean Air Vehicles [4]	21
Parking Spaces with EV Charging Stations[5]	64	Parking Spaces with EV Charging Stations [5]	64
Parking Spaces with EV Supply Equipment[5]	85	Parking Spaces with EV Supply Equipment [5]	85

Notes:
sf = square feet

1 Pursuant to LAMC Section 12.21 A4(x)(3)3.

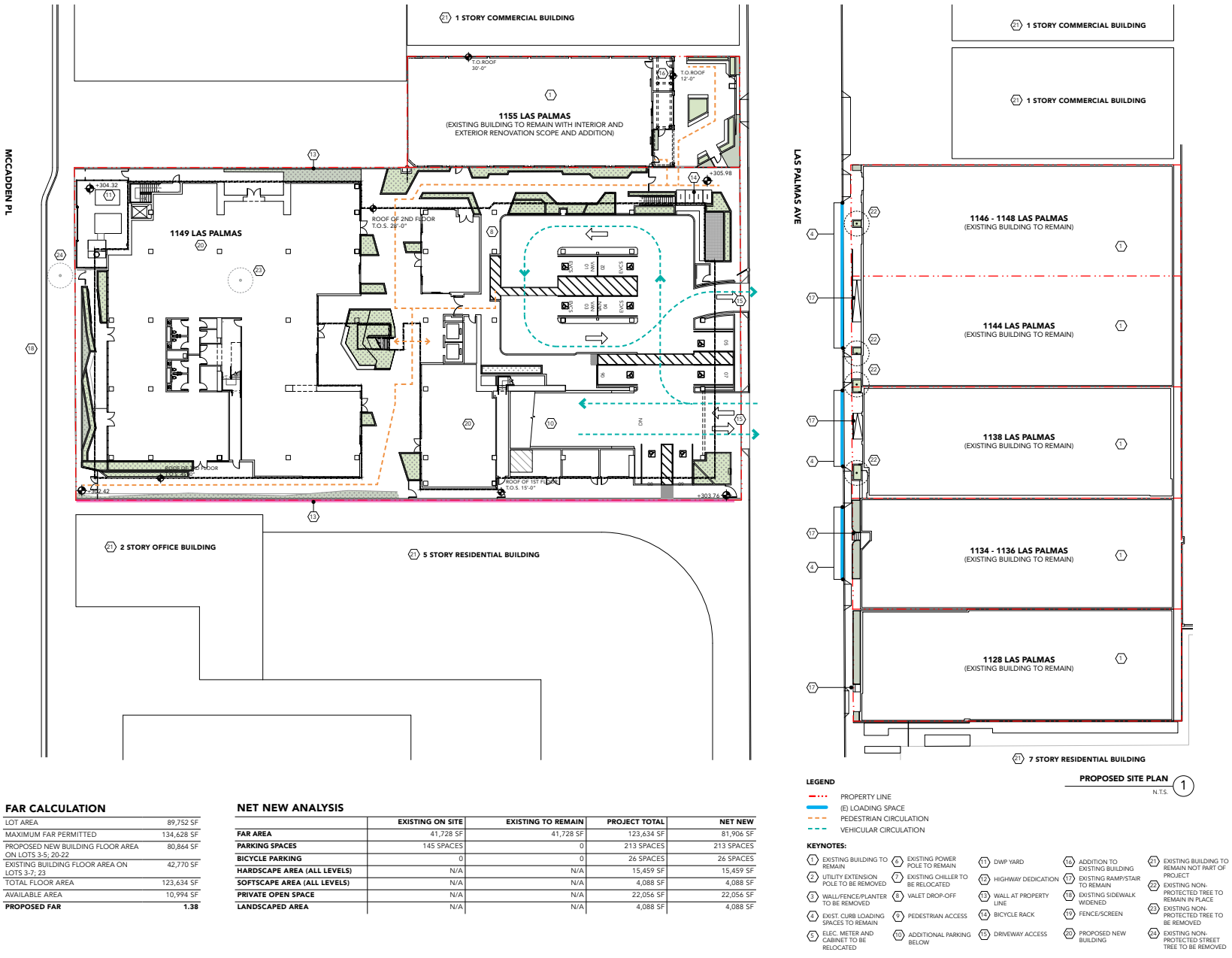
2 Pursuant to the Certificate of Occupancy

3 Pursuant to City Ordinance No. 185,480, new or existing code-required vehicle parking spaces for all uses may be replaced by bicycle parking at a ratio of one vehicle space for every four bicycle spaces.

4 Pursuant to 2019 California Green Building Standards, Nonresidential Mandatory Measures, Table 5.106.5.2, Designated Parking for Clean Air Vehicles.

5 Pursuant to the Los Angeles Green Building Code, Division 5, Nonresidential Mandatory Measures.

Source: Bardas Investment Ground, Otherworks, House & Robertson Architects, and KSA Inc., Landscape Studio, 1149 Las Palmas Entitlements Master Plans, December 2022.



FAR CALCULATION

LOT AREA	89,752 SF
MAXIMUM FAR PERMITTED	134,628 SF
PROPOSED NEW BUILDING FLOOR AREA ON LOTS 3-5; 20-22	80,864 SF
EXISTING BUILDING FLOOR AREA ON LOTS 3-7; 23	42,770 SF
TOTAL FLOOR AREA	123,634 SF
AVAILABLE AREA	10,994 SF
PROPOSED FAR	**1.38**

NET NEW ANALYSIS

	EXISTING ON SITE	EXISTING TO REMAIN	PROJECT TOTAL	NET NEW
FAR AREA	41,728 SF	41,728 SF	123,634 SF	81,906 SF
PARKING SPACES	145 SPACES	0	213 SPACES	213 SPACES
BICYCLE PARKING	0	0	26 SPACES	26 SPACES
HARDSCAPE AREA (ALL LEVELS)	N/A	N/A	15,459 SF	15,459 SF
SOFTSCAPE AREA (ALL LEVELS)	N/A	N/A	4,088 SF	4,088 SF
PRIVATE OPEN SPACE	N/A	N/A	22,056 SF	22,056 SF
LANDSCAPED AREA	N/A	N/A	4,088 SF	4,088 SF

Source: House & Robertson Architects, December 2022

FIGURE 19: Project Circulation
1151 Las Palmas

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As shown in **Table 4**: *Summary of Required and Proposed Bicycle Parking*, the Project is required to provide 26 bicycle parking spaces. The Project would provide 17 long-term bicycle parking spaces on Building A's subterranean parking Level 1 and nine short-term bicycle parking spaces on Building A's ground level adjacent to Building A along N. Las Palmas Avenue. Four showers and a total of 17 lockers would be provided in the first level of the subterranean parking.

Table 4: Summary of Required and Proposed Bicycle Parking

	Use	Size	Parking Ratio	Required Spaces
Building A	Office	80,987 sf	LT: 1 per 5,000 sf [1] ST: 1 per 10,000 sf [1]	LT: 17 ST: 9
Building B	Existing Office New Office Retail	5,498 sf 560 sf 135 sf	-- [2] -- --	0 0 0
Building C	Office	11,570	-- [3]	0
Building D	Office	9,560	-- [3]	0
Building E	Office	8,050	-- [3]	0
Building F	Office	7,050	-- [3]	0
Total Required Bicycle Parking				**LT: 17 ST: 9**
Total Proposed Bicycle Parking				**LT: 17 ST: 9**

sf = square feet; LT = long-term; ST = short-term
1 Pursuant to LAMC Table 12.21 A.16(a)(2), Required Bicycle Parking Spaces per Building Floor Area.
2 Pursuant to LAMC Section 12.21 A.16(c), buildings undergoing a change of use shall not be required to provide bicycle parking.
3 Existing uses that would not be expanded are not required to provide bicycle parking.
Source: Bardas Investment Ground, Otherworks, House & Robertson Architects, and KSA Inc., Landscape Studio, 1149 Las Palmas Entitlements Master Plans December 2022.

Lighting and Signage

The Project would install various exterior lights on and around Building A and Building B. The exterior lighting would include soffit downlights in the ground floor covered area, as well as low-level landscape lighting and limited façade up-lighting (including lighting of the feature exterior stair on the east-facing elevation) to highlight key architectural features. Exterior lights would be wall- or ground-mounted and shielded away from adjacent land uses. Building security lighting would be used at all entry and exits and would remain on from dusk to dawn, but would be designed to prevent light trespass onto adjacent properties. All exterior lighting would meet applicable LAMC standards and be shielded or directed toward the areas to be illuminated.

The Project Site is located within the boundaries of the Hollywood Signage Supplemental Use District (Hollywood Sign District) and all signage at the Project Site would be subject to its regulations, standards, and prohibitions. However, the Project does not propose any new signage at the Project Site.

Site Security

During construction, the Project Site would be secured with perimeter fencing. During Project operations, other than the retail component of the Project, the Project will not be open to the public. The plans for the Project would incorporate guidelines as identified in the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles Police Department. Such design

Source: House & Robertson Architects, December 2022

FIGURE 20: Aerial View from the Corner of Lexington and McCadden
1151 Las Palmas

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Source: House & Robertson Architects, December 2022

FIGURE 21: View from McCadden Place
1151 Las Palmas

Kimley»Horn

Source: House & Robertson Architects, December 2022

FIGURE 22: View from Lexington and Las Palmas
1151 Las Palmas

Kimley»Horn

guidelines provide security design measures for semi-public and private spaces, which may include but not be limited to, the use of security cameras, access control to the building, secured parking facility with key system, and well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of building entrances in high-foot traffic areas.

Sustainability Features

The Project would comply with the City's Green Building Code. The Green Building Code requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The Green Building Code contains both mandatory and voluntary green building measures to conserve energy.

The Project would include enhanced energy-efficiency via high-performance glazing as well as enhanced roof and deck insulation values in buildings. The air conditioning system would be comprised of highly efficient Variable Refrigerant Flow systems allowing for minimal electrical consumption, particularly when the building is lightly occupied. The building systems would include enhanced filtration of outside air being delivered to the occupied areas, and operable windows and sliding glass walls that would enhance the natural ventilation whenever weather conditions permit. Vertical circulation via the feature outdoor stair would further enhance the health and wellness of the occupants. The winged roofs and second and third story balconies on Building A are designed to allow the building to take advantage of the natural lights and breeze and correspondingly lower energy consumption.

Water usage would be minimized via the use of ultra-low flow plumbing fixtures throughout the Project. All roof, balcony, and plaza deck drains would feed into a rainwater harvesting cistern, to be used entirely for irrigation of the on-site landscaping. The irrigation system would be designed to meet or exceed the state Model Water Efficient Landscape Ordinance. The system would utilize a dedicated landscape water meter and automatic weather-based controllers with electronically operated control valves and seasonal irrigation schedules. All areas would include high efficiency irrigation emitters, including micro spray and drip irrigation. Bubblers would be used for trees or shrubs where drip irrigation is not feasible.

The on-site drop-off area in the surface parking lot would encourage ridesharing and carpooling, while the below-grade parking would include preferential parking for electric and low-emitting vehicles. The Project would also provide electric vehicle charging stations beyond code-requirements. The Project's infill location would promote the concentration of development in an urban location with extensive infrastructure and access to public transit facilities, which would reduce vehicle miles traveled for the office space.

Anticipated Construction Schedule

For purposes of analyzing impacts associated with air quality, this analysis assumes a Project construction schedule of approximately 20 months, with construction beginning the first quarter of 2023 and final construction ending in the fourth quarter of 2024. Construction activities would be undertaken in four main steps: (1) demolition; (2) grading, excavation, site preparation, and foundations; (3) building construction and paving; and (4) finishing and architectural coatings. Construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible

hours of construction within the City are 7:00 A.M. to 9:00 P.M. Monday through Friday, and between 8:00 A.M. and 6:00 P.M on any Saturday or national holiday. No construction activities are permitted on Sundays.

The Project would include approximately 51,800 cubic yard of export and approximately 150 truck trips will be required for export.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The MND 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:

- **Site Plan Review.** Pursuant to the Los Angeles Municipal Code ("LAMC") Section 16.05, the Applicant requests Site Plan Review to allow the demolition an existing parking lot and the construction of a three-story, approximately 80,987 square-foot office building with three levels of subterranean parking, retain four existing buildings at 1128 to 1146 N. Las Palmas Avenue, and renovate an existing building at 1155 N. Las Palmas Avenue, change use to office, and construct an approximately 695-square-foot addition on the ground floor.
- **Conditional Use Permit.** Pursuant to the Los Angeles Municipal Code ("LAMC") Section 12.24-A19, to allow FAR Averaging in a Unified Development in the C zone.
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, haul route approval, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits

4 ENVIRONMENTAL IMPACT ANALYSIS

4.1 AESTHETICS

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

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.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File 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." [3]

PRC Section 21099 applies to the Project, as the Project is an employment center project" located in a "transit priority area" as defined in PRC Section 21099(a). Therefore, the Project is exempt from aesthetic impacts, and the analysis in this IS/MND is provided for informational purposes only, and not for determining whether the Project would result in potentially significant impacts to the environment. As such, nothing in this aesthetic discussion shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

a) Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. The Project is located in the Hollywood Community Plan area within the City of Los Angeles. The City of Los Angeles' General Plan Conservation Element defines scenic vistas as the panoramic public views that provide access to natural features, including views of the ocean, striking or unusual natural terrain, or unique urban or historic resources. Panoramic public views within the Hollywood Community Plan area include views of the Santa Monica Mountains, the Hollywood Hills, and the Hollywood Sign. Adjacent to the Project Site, views of the Hollywood Hills and the Hollywood Sign are available looking north from locations along north-south streets. Specifically, distant views of the Hollywood Hills and the Hollywood Sign are available from locations along N. McCadden Place west of the Project Site and along N. Las Palmas Avenue east of the Project Site.

The western portion of the Project Site is currently developed with a one-story, 30-foot-tall manufacturing building and a surface parking lot. The eastern portion is currently developed with four office buildings ranging from one- to two-stories. The Project Site area is not located within a designated Hillside Area and is predominantly flat. The current viewshed at the Project Site is characterized by existing urban development consisting of low- to mid-rise manufacturing, commercial, and multi-family residential uses. There are no prominent topographical features on the Project Site from which scenic vistas could be viewed, nor does the Project Site contain a scenic vista.

Once the Project is built, distant views of the Hollywood Hills and the Hollywood Sign would continue to be available in the vicinity of the Project Site on an intermittent basis along roadway segments, particularly north-south roadways. In particular, the Project would not block existing public views of the distant Hollywood Hills or Hollywood Sign from N. McCadden Place or N. Las Palmas Avenue because the existing views are oriented north-south, and the Project Site is an infill location between these north-south streets. The Project would not directly obstruct an existing public view of a scenic vista as no scenic vistas are near the Project Site vicinity. Furthermore, because the Project is an infill, employment center project located within a TPA, it is subject to ZI File No. 2452 and is exempt from aesthetic impacts. Even if the Project had potential aesthetic impacts, which it does not, its impacts would not be considered to be significant impacts on the environment and no mitigation measures would be required.

[3] 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. Available at: http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf

b) Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

Less Than Significant Impact. There are no designated state scenic highways within the vicinity of the Project Site. The nearest state-designated scenic highways are a 55-mile segment of SR-2 (Angeles Crest Highway) located over 13 miles to the northeast of the Project Site and a 2.5-mile segment of SR-27 (Topanga Canyon Boulevard) located over 14 miles southwest of the Project Site. In addition, the nearest highways eligible for designation as state scenic highways are SR 187 located over 10 miles to the southwest of the Project Site and I-210 (Foothill Freeway) located over 10 miles to the northeast of the Project Site. As such, the Project would not substantially damage scenic resources within a state scenic highway.

In addition, as discussed in detail in Section 4.5, *Cultural Resources* below, there are historic resources located in the vicinity of the Project Site. These include the 1161 N. Las Palmas Avenue building, Toberman Storage Company located at 1025 N. Highland Avenue, Kodak Corporation located at 6700 Santa Monica Boulevard and the Hollywood Center Studios Historic District at 1040 N. Las Palmas Avenue. As evaluated in 4.5, *Cultural Resources* due to its relatively low scale, the Project would not significantly change any views to or from these resources that have not already been impeded by higher-scale intervening development. Therefore, impacts related to scenic resources would be less than significant, and no mitigation measures are required.

Furthermore, because the Project is an infill, employment center project located within a TPA, it is subject to ZI File No. 2452 and is exempt from aesthetic impacts. Therefore, the Project would not have an impact on scenic resources or historic buildings within a state scenic highway. Therefore, impacts would be less than significant, and no mitigation measures are required.

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?

Less Than Significant Impact. The Project Site is located in an urbanized area of the City; therefore, the applicable threshold with respect to the Project is consistent with applicable zoning and other regulations governing scenic quality.

Consistency with Zoning

The Project Site has a General Plan land use designation of Limited Manufacturing. The Project Site is zoned [Q]M1-1VL-SN. The M1 zone permits commercial and light industrial uses. The City Council adopted the Q Classification in 1989 with Ordinance Number 164,704, and limits the commercial uses allowed at the Project Site to those permitted in the C4 zone, including office, retail, and restaurant uses. Both the M1 zoning and the Q Classification are consistent with the General Plan land use designation of Limited Manufacturing. The M1 zone has an unlimited height, but the Height District No. IVL restricts the height of development to 45 feet, three stories, and a FAR of 1.5:1.

The Project would be consistent with the zoning for the Project Site, including the land use, FAR, height, and setback requirements, standards, and limits established in the LAMC for the M1-1VL-SN zone.

With approval of the CUP requested under LAMC Section 12.24-A19, to allow FAR Averaging in a Unified Development in the C zone, the Project's FAR of 1.38:1 would be consistent with the applicable zoning regulations.

The Project Site is also subject to the requirements of the Hollywood Signage Supplemental Use District, which limits the number, size, material, and illumination of allowed signs and requires the approval of the Planning Department prior to the issuance of a sign permit from the Los Angeles Department of Building and Safety (LADBS).[4] The Project does not propose any new signage and would, accordingly, not conflict with the requirements of the Hollywood Signage Supplemental Use District.

Other Regulations Governing Scenic Quality: Citywide General Plan Framework Element and Citywide Design Guidelines

City of Los Angeles General Plan

The Citywide General Plan Framework Element (December 1996 and readopted in August 2001) 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 Site is located within the boundaries of the Hollywood Community Plan (1988). The Hollywood Community Plan is one of the community plans that comprise the Land Use Element of the City of Los Angeles' General Plan and is intended to promote an arrangement of land use, circulation, and services which will encourage and contribute to the economic, social, and physical health, safety, welfare, and convenience of the Community, within the larger framework of the City. The Hollywood Community Plan does not contain specific design guidelines for the Project Site or office uses.

Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the General Plan Framework Element's urban design principles and are intended to be used by DCP staff, developers, architects, engineers, and community members in evaluating project applications and relevant policies from the Framework Element and Community Plans. The Citywide Design Guidelines were established to carry out common design objectives that maintain neighborhood form and character while promoting design excellence and innovative development solutions. The Citywide Design Guidelines are not intended to supersede the LAMC and/or other regulatory documents such as specific plans and overlays, which may contain design guidelines that better address the specific needs of different geographic areas and communities. As such, in cases where the Citywide Design Guidelines conflict with a provision in a Community Plan's Urban Design chapter, specific plan, overlays, or other local design guidelines, the community-specific requirement will prevail.[5] Additionally, as stated in the Citywide Design Guidelines, although each of the objectives and corresponding guidelines should be considered in a project, not all of them will be

[4] City of Los Angeles, Ordinance 181,340 as amended, effective: November 17, 2010, available at: https://planning.lacity.org/Code_Studies/Other/HwdSignOrd.pdf .

[5] City of Los Angeles Department of City Planning, Citywide Design Guidelines, adopted by the City Planning Commission on October 24, 2019.

appropriate in every case, as each project will require a unique approach, and "flexibility is necessary and encouraged to achieve excellent design."[6]

In October 2019, the City Planning Commission adopted a new set of Citywide Design Guidelines that consolidates the guidelines for three project types into a single document in order to establish a more efficient and effective design review process. The new set includes adopted City policies and up-to-date design solutions that were not previously considered, plus input from various City departments including the Department of Building and Safety, Bureau of Engineering, Cultural Affairs, and the Mayor's Sustainability and Resiliency teams.[7]

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

The Project would improve the pedestrian experience by providing additional street trees on-site trees compared to existing conditions. Under existing conditions, the Project Site includes six existing trees, including one street tree and five existing trees on the interior of the Project Site. The Project proposes to remove the one on-site tree and one street tree on the western portion of the Project Site and provide a total of 13 trees in the western portion of the Project Site including two new street trees.

Project would also provide landscaping between Building A and the sidewalk on N. McCadden Place, and provide ground cover, planters, and trees within the ground floor interior courtyard and the second and third floor decks. The proposed landscaping would promote walkability along N. McCadden Place and N. Las Palmas Avenue and would enhance the built environment.

The Project would also provide adequate lighting for security and wayfinding purposes. 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 would provide separate pedestrian entrances to ensure safe pedestrian access separate from vehicular activity. Vehicular access to the western portion of the Project Site is currently provided by three driveways each on both N. McCadden Place and N. Las Palmas Avenue. The Project proposes to close all N. McCadden Place driveways and limit all vehicular access to the proposed Building A parking garage to N. Las Palmas Avenue.

Two driveways are proposed along the western side of N. Las Palmas Avenue: (1) one driveway would provide two-way entry/exit to the subterranean parking levels beneath Building A for monthly parkers and valet parking, as well as entry to the ground floor parking level; and (2) a one-way exit from the ground floor parking level for Uber, Lyft or rideshare drop off. The Project significantly reduces the number of vehicular access points at the Project Site. The limited number of vehicular access points would help to avoid disrupting the streetscape along the perimeter of the Project Site and promote pedestrian safety along McCadden Place and Las Palmas Avenue.

[6] City of Los Angeles Department of City Planning, Commercial Citywide Design Guidelines, Pedestrian-Oriented/Commercial and Mixed-Use Projects, May 2011, p. 5.

[7] City of Los Angeles City Planning Commission, Recommendation Report, Case No. CPC-2019-1098-MSC, October 24, 2019.

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

The Project would not be open to the public; therefore, no open space requirements would apply to the Project. However, the Project would provide 22,056 square-feet of private open space for the proposed tenants of Building A as part of its design intended to promote worker well-being and enjoyment and attract/retain media-focused tenants in Hollywood. The Project is designed so that building facades are in harmony with uses on all sides of the Project Site. Pedestrian entrances along the ground floor are concentrated on N. Las Palmas Avenue to promote sidewalk activity along the street and integrate the Project Site on both the eastern and western sides of N. Las Palmas Avenue. The exterior facades would incorporate muted architectural design to respect and blend with the adjacent office and warehouse and distribution buildings to the north and the east, the LA LGBT Center, and residences to the south. The exterior facades along N. Las Palmas Avenue, the local street adjoining both sides of the Project Site, will be lined with vehicular and pedestrian access points, a retail store front, and open-air balconies, building entrances, and awnings to enhance the pedestrian experience. The Project proposes to close all driveways along N. McCadden Place and limit the access to Building A's parking garage to just two driveways along Las Palmas Avenue. The reduction of driveways on N. McCadden Place would promote N. McCadden Place's pedestrian safety and provide an enhanced pedestrian experience.

Guideline 5: Express a clear and coherent architectural idea

The Project would express a clear and coherent architectural idea. The three-story new office building (Building A) to be constructed will feature curved, layered roofing and will incorporate a modern architectural design. Building B is currently designed with a stylistic, modern sculpted roof which will be preserved. The one-story retail/office addition would be constructed in front of the existing Building B and a retail courtyard is proposed in front of the new one-story addition.

The exterior facade of Building A would echo Building B's existing design and would feature a curved roof to increase the availability of natural light within the building. Glass panels, simulated wood, perforated metal railings, and concrete panels would be used to reflect the industrial history of the Project Site and create a facade architecturally consistent with Building B and Buildings C through F. Renovations to the exterior of Building B would also incorporate contemporary glass and metal facades utilizing the same neutral color palette as Building A.

The Project's design, massing, and height are designed to be compatible with the neighboring one- to six-story commercial and residential uses. The placement of the entrances to the Project Site along N. Las Palmas Avenue, away from the more heavily trafficked Santa Monica Boulevard, enhances pedestrian walkability and safety at the interior portion of the Project Site. Additionally, the concentration of activity along N. Las Palmas Avenue helps to integrate the Project Site on both the eastern and western sides of Las Palmas. Overall, the Project design would express a clear and coherent architectural idea.

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

The Project would provide 22,056 square-feet of private open space for the proposed tenants of Building A as part of its design intended to promote worker well-being and enjoyment and attract/retain media-focused tenants in Hollywood. The softscape planting areas would be located throughout the courtyard,

terrace, decks, pedestrian entryways, and perimeter of Building A, and would contain a variety of low-growth shrubs, bushes, and plants.

The Project would maintain all existing street trees and planters within the eastern portion of the Project Site along the east side of N. Las Palmas in front of Buildings C-F. Currently, the western portion of the Project Site contains landscape vegetation and five on-site trees as well as one street tree. None of the existing on-site or street trees is a protected species or a heritage tree.

The Project proposes to remove the one on-site tree and one street tree on the western portion of the Project Site and provide a total of 13 trees in the western portion of the Project Site including two new street trees. Project would also provide landscaping between Building A and the sidewalk on N. McCadden Place, and provide ground cover, planters, and trees within the ground floor interior courtyard and the second and third floor decks.

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

With the exception of the small retail area, the Project would be closed to the general public. The Project would incorporate guidelines as identified in the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles Police Department. Such design guidelines provide security design measures for semi-public and private spaces, which may include but not be limited to, the use of security cameras, access control to the building, secured parking facility with key system, and well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of building entrances in high-foot traffic areas. The Project would also include lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify and secure routes between parking areas and points of entry into the buildings.

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

The Project Site is located in an urbanized and developed area of the City and the Project Site does not contain expansive natural areas or substantial landscaping.

The Project would provide 22,056 square-feet of private open space for the proposed tenants of Building A as part of its design intended to promote worker well-being and enjoyment and attract/retain media-focused tenants in Hollywood. The softscape planting areas would be located throughout the courtyard, terrace, decks, pedestrian entryways, and perimeter of Building A, and would contain a variety of low-growth shrubs, bushes, and plants.

The Project would maintain all existing street trees and planters within the eastern portion of the Project Site along the east side of N. Las Palmas in front of Buildings C-F. The Project proposes to remove the one on-site tree and one street tree on the western portion of the Project Site and provide a total of 13 trees in the western portion of the Project Site including two new street trees. Project would also provide landscaping between Building A and the sidewalk on N. McCadden Place, and provide ground cover, planters, and trees within the ground floor interior courtyard and the second and third floor decks.

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

The Project would be designed and constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code. The Project's design is based on principles of smart growth and environmental sustainability.

The Project would include enhanced energy-efficiency via high-performance glazing as well as enhanced roof and deck insulation values in buildings. The air conditioning system would be comprised of highly efficient Variable Refrigerant Flow systems allowing for minimal electrical consumption, particularly when the building is lightly occupied. The winged roofs and second and third story balconies on Building A are designed to allow the building to take advantage of the natural lights and breeze and correspondingly lower energy consumption.

Water usage would be minimized via the use of ultra-low flow plumbing fixtures throughout the Project. All roof, balcony, and plaza deck drains would feed into a rainwater harvesting cistern, to be used entirely for irrigation of the on-site landscaping. The system would utilize a dedicated landscape water meter and automatic weather-based controllers with electronically operated control valves and seasonal irrigation schedules. All areas would include high efficiency irrigation emitters, including micro spray and drip irrigation. Bubblers would be used for trees or shrubs where drip irrigation is not feasible.

The on-site drop-off area in the surface parking lot would encourage ridesharing and carpooling, while the below-grade parking would include preferential parking for electric and low-emitting vehicles. The Project would also provide electric vehicle charging stations. The Project's infill location would promote the concentration of development in an urban location with extensive infrastructure and access to public transit facilities, which would reduce vehicle miles traveled for the office space.

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

The Project would be required to comply with the City's Low Impact Development (LID) ordinance and to implement standard erosion controls to limit stormwater runoff. As part of these requirements, the Project would construct storm drainage infrastructure, including roof drains and downspouts, to convey on-site runoff to a stormwater treatment system. As discussed in the Hydrology Report (Appendix G) the proposed stormwater treatment system will consist of an underground rainwater harvesting cistern which will capture the stormwater runoff. On-site runoff that exceeds the required stormwater treatment volume will be pumped to a sump pump outlet control structure from the rain harvesting cistern and discharge to the curb face via a curb drain.

Overall, the Project would be consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Urban Form and the Citywide Design Guidelines regarding scenic quality. Based on the above, the Project would be consistent with the zoning for the Project Site. The Project Site is not located within the boundaries of or subject to any Specific Plan or Community Design Overlay. As such, the Project would not conflict with applicable zoning or other regulations governing scenic quality. Furthermore, because the Project is an infill, employment center project located within a TPA, it is subject to ZI File No. 2452 and is exempt from aesthetic impacts.

Therefore, impacts would be less than significant, and no mitigation measures are required.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

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

Construction

While the majority of Project construction would occur during daylight hours, there is a potential that construction could occur in the evening hours and require the use of artificial lighting, particularly during the winter season when daylight is no longer sufficient earlier in the day. Outdoor lighting sources, such as floodlights, spotlights, and/or headlights associated with construction equipment and hauling trucks, typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of Project construction. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements.[8] Additionally, as part of the Project, construction lighting would be shielded to minimize light spillover. Construction lighting, while potentially bright, would be focused on the particular area undergoing work.

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

Based on the above, light and glare associated with Project construction activities would not substantially alter the character of off-site areas surrounding the Project Site or adversely impact day or nighttime views in the area. Therefore, impacts related to light and glare during construction would be less than significant, and no mitigation measures are required.

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

Operation

Light

The Project Site currently contains a surface parking lot and existing manufacturing and office buildings, all of which contain nighttime security lighting. The Project Site is also located in a well-lit area of the City where there are moderate levels of ambient nighttime lighting, including street lighting, vehicle headlights, architectural and security lighting, and indoor building illumination (light emanating from structures that passthrough windows).

The Project would introduce new sources of light and glare that are typically associated with commercial buildings, including architecture, interior, security, and wayfinding lighting sources. However, all Project lighting would comply with current energy standards and codes, while providing efficient and effective on-site lighting. Nighttime security lighting for the Project would be provided to illuminate building entrances, parking areas, and internal roadways and walkways. The nearest sensitive receptors in the vicinity of the Project Site are the multi-family residences across Lexington Avenue to the north, the AVA Hollywood apartments to the east and south, and residential uses and the Los Angeles LGBT Anita May Rosenstein Center to the south. However, all exterior lights would be wall- or ground-mounted and shielded away from adjacent land uses and security lighting would be designed to prevent light trespass onto adjacent properties. It is not anticipated that the amount of light emanating from the Project would represent a noticeable increase over current light levels.

The Project would include appropriate levels of interior and exterior lighting for security, parking, and architectural highlighting. Outdoor lighting would be designed and installed with shielding, such that lighting would be directed and focused on the Project in accordance with LAMC lighting regulations that require that operational lighting would be directed downward or on the specific on-site feature to be lit and avoid direct glare onto exterior glazed windows or glass doors of existing and adjacent uses.

Glare

Daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. In general, sun reflection that has the greatest potential to interfere with driving occurs from the lower stories of a structure. Similar to the existing development at the Project Site, sun reflection from the Project would occur during periods in which the sun is low on the horizon and when the point of reflection within the Project Site is in front of the driver, in the direction of travel. The Project Site currently contains a surface parking lot and existing manufacturing and office buildings constructed of various non-reflective materials. No sources of substantial glare are anticipated with implementation of the Project. Exterior building materials of Building A and Building B would use various non-reflective material designed to minimize the transmission of glare from the Project's buildings and would not include polished metals. The Project building would be prohibited from using highly reflective building materials such as mirrored glass on exterior facades. Parking would be located within Building A, thereby reducing potential nighttime glare from vehicles.

Based on the above, the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Furthermore, because the Project is an infill,

employment center project located within a TPA, it is subject to ZI File No. 2452 and is exempt from aesthetic impacts. Therefore, impacts would be less than significant, and no mitigation measures would be required.

Cumulative Impacts

As indicated in the related projects map (**Figure 24**), none of the related projects is located in the immediate vicinity of the Project Site, nor does any related project share a direct line-of-site with the Project. Moreover, like the Project, the related projects would be reviewed on a case-by-case basis by the City to comply with LAMC requirements regarding, building heights, setbacks, massing, and lighting or, for those projects that require discretionary actions, to undergo site-specific review regarding building density, design, and light and glare effects. Lastly, the Project would result in less-than-significant aesthetics impacts and thus would not contribute considerably to cumulative aesthetics impacts. For all these reasons, cumulative aesthetics impacts would be less than significant.

4.2 AGRICULTURE AND FORESTRY RESOURCES

ENVIRONMENTAL Issues	IMPACTS	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. 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. Would the project:					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?		☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?		☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?		☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?		☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?		☐	☐	☐	☒

a) 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 a highly urbanized setting and is currently developed with office and manufacturing uses as well as surface parking. No agricultural uses, or related farmland operations, are present within the Project Site or surrounding area.

The Project Site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.[9] The urban character of the Project Site would be consistent with the Farmland Mapping and Monitoring Program's definition of "Urban and Built-Up Land," which does not constitute farmland. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. Therefore, no impacts would occur, and no mitigation measures would be required.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Williamson Act of 1965 allows local governments to enter into contractual agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use. The Project Site is zoned [Q]M1-1VL-SN (Qualified Limited Industrial in Height District 1VL subject to a Sign District) and has a General Plan Land Use Category of Limited Manufacturing. Accordingly, the Project Site is not zoned for agricultural use nor are there agricultural uses occurring on or in the vicinity of the Project Site. The Project Site is located within an Urban Agriculture Incentive Zone; however, the Project does not involve a contract to use vacant property for agricultural purposes in exchange for reduced property taxes. The Project Site is not zoned for agricultural uses presently and would not be rezoned to permit agricultural uses and is not subject to a Williamson Act contract. Therefore, no impacts would occur, and no mitigation measures would be required.

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))?

No Impact. The Project Site is zoned [Q]M1-1VL-SN (Qualified Limited Industrial in Height District 1VL subject to a Sign District) and has a General Plan Land Use Category of Limited Manufacturing. In the City of Los Angeles, forest land is a permitted use in areas zoned OS (Open Space) and no forest land exists on the Project Site. The City does not have specific zoning for timberland or timberland production; however, the Project Site is currently developed with a parking lot and manufacturing and office uses and does not include timberland or timberland production uses. As such, the Project would not conflict with existing zoning for forest land or timberland or result in the rezoning of forest land, timberland, or timberland production. Therefore, no impacts would occur, and no mitigation measures would be required.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. No forest land exists at the Project Site. In addition, the surrounding vicinity is developed with residential, manufacturing, and office uses in a developed area of the City. Accordingly, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impacts would occur, and no mitigation measures would be required.

[9] State of California Department of Conservation, California Important Farmland Finder, https://maps.conservation.ca.gov/DLRP/CIFF/ Accessed August 18, 2022.

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?

No Impact. The Project Site is located in an urban area of the City developed with a parking lot and manufacturing and office uses. No agricultural uses, designated Farmland, or forest land uses occur at the Project Site or within the surrounding area. The Project would construct a new office building and remodel/expand and convert an existing manufacturing building to office use consistent with the zoning for the Project Site. As such, implementation of the Project would not result in the conversion of existing Farmland, agricultural uses, or forest land on- or off-site. Therefore, no impacts would occur, and no mitigation measures would be required.

Cumulative Impacts

No agricultural or forest uses exist within the Project Site or its vicinity. Therefore, the Project would not convert agricultural or forestry resources to other uses. In addition, the Project Site and adjacent properties are not designated or zoned for agricultural or forestry use, nor are the Project Site and adjacent parcels subject to Williamson Act contracts. Furthermore, none of the related projects proposes converting agricultural or forestry resources to other uses. Therefore, the Project would not contribute considerably to cumulative agriculture and forestry resources impacts, and cumulative agriculture and forestry resources impacts would be less than significant.

4.3 AIR QUALITY

ENVIRONMENTAL Issues	IMPACTS	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
3.	**AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:**				
a)	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c)	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d)	Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	☐	☐	☒	☐

The analysis is based on the information provided in the *1151 N. Las Palmas, Air Quality and Greenhouse Gas Impact Assessment,* prepared by Kimley-Horn, May 2023 and in Appendix A.

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. As part of its enforcement responsibilities, the Environmental Protection Agency (EPA) requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under State law, the California Ambient Air Quality Standards (CAAQS) requires an air quality attainment plan to be prepared for areas designated as nonattainment regarding the state and federal ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The Project is located within the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is required, pursuant to the Federal Clean Air Act (FCAA), to reduce emissions of criteria pollutants for which the SCAB is in nonattainment. To reduce such emissions, the SCAQMD drafted the 2016 Air Quality Management Plan (AQMP) and 2022 AQMP. The 2016 AQMP establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving state (California) and national air quality standards. The 2022 AQMP builds upon measures already in place from previous AQMPs.[10] The primary purpose of the 2022 AQMP is to identify, develop, and

[10] South Coast Air Quality Management District, *2022 Air Quality Management Plan, page ES-2,* December 2022. http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan

implement strategies and control measures to meet the 2015 8-hour ozone National Ambient Air Quality Standard (NAAQS). The AQMP (refers to both the 2016 and 2022 AQMP) is a regional and multi-agency effort including the SCAQMD, the CARB, the Southern California Association of Governments (SCAG), and the EPA. The AQMP's pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's growth projections and the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. The Project is subject to the SCAQMD's AQMP.

Criteria for determining consistency with the AQMP are defined by the following indicators:

- **Consistency Criterion No. 1**: The Project will not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.
- **Consistency Criterion No. 2**: The Project will not exceed the assumptions in the AQMP or increments based on the years of the Project build-out phase.

According to the SCAQMD's *CEQA Air Quality Handbook*, the purpose of the consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and thus if it would interfere with the region's ability to comply with CAAQS and National Ambient Air Quality Standards (NAAQS).[11]

The violations to which Consistency Criterion No. 1 refers are CAAQS and NAAQS. As shown below, the Project would not exceed the construction or operational standards. Therefore, the Project would not result in an increase in frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP. Thus, the Project would be consistent with the AQMP under the first criterion.

Concerning Consistency Criterion No. 2, the 2022 AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts. SCAG's growth forecasts (SCAG's 2020-2045 RTC/SCS) are made in consultation with local governments and with reference to their local general plans. The 2020–2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review.[12] The Project is expected to generate a net increase of 346 employees at the Project Site.[13] Growth forecasts prepared by SCAG contained in the 2020-2045 RTP/SCS indicate that employment within the City will increase from 1,848,300 jobs in 2016 to 2,135,900 jobs in 2045, an increase of 287,600 jobs.[14]

[11] South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993.
[12] Southern California Association of Governments, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.
[13] City of Los Angeles VMT Calculator Documentation, Version 1.3, LADOT, Los Angeles Department of Transportation and Los Angeles Department of City Planning, Table 1, Land Use and Trip Generation Base Assumptions, May 2020
[14] Southern California Association of Governments, Connect SoCal (2020–2045 RTP/SCS), Demographics and Growth Forecast adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579

Representing 0.1 percent of this increase, the Project's net employee increase would be within local and regional employment projections. Thus, the Project would also be consistent with the AQMP under the second criterion.

In addition, the Project would not conflict with or obstruct implementation of the City's General Plan Air Quality Element.[15] The City's General Plan Air Quality Element identifies policies and strategies for advancing the City's clean air goals. To achieve the goals of the Air Quality Element, performance-based standards have been adopted by the City of Los Angeles to provide flexibility in implementation of its policies and objectives. The goal, objectives, and policies provided in the City's Air Quality Element applicable to the Project include the following:

- **Goal 1:** Good air quality and mobility in an environment of continued population growth and healthy economic structure.
- **Objective 1.1:** It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.
- **Objective 1.3:** It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.
- **Policy 1.3.2:** Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.
- **Policy 4.2.3:** Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.

The Project's location within an existing developed urban area would reduce VMT and related vehicle emissions in comparison to a project located in a non-urban environment as discussed further in Section 4.17, *Transportation*. High population density would result in employees and visitors potentially living closer to the Project Site, reducing travel distances and overall VMT. In addition, the Project includes short- and long-term bicycle parking spaces (i.e., 26 bicycle parking spaces consisting of 9 short-term and 17 long-term spaces), shower/changing facilities, pedestrian-friendly features (e.g., a separate pedestrian entrance at the main gate), and on-site EV and EV-ready parking, and the Project Site provides convenient access to public transit, all of which encourages multi-modal transportation and facilitates a reduced use of vehicular use and a reduction in VMT.

Project implementation would not exceed the SCAQMD localized significance thresholds which were developed to ensure no exceedances of the California or federal ambient air quality standards or thresholds. As the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for air quality pollutants (including VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$), the Project also would not delay timely attainment of air quality standards or interim emission reductions specified in the 2016 AQMP. In addition, the Project would be consistent with the population and employment growth projections in the AQMP.

[15] Department of City Planning Los Angeles, General Plan Air Quality Element, November 1992, https://planning.lacity.org/odocument/0ff9a9b0-0adf-49b4-8e07-0c16feea70bc/Air_Quality_Element.pdf.

Based on the above, the Project would not conflict with or obstruct implementation of the SCAQMD's AQMP or the City's General Plan Air Quality Element. Impacts would be less than significant, and no mitigation measures are required.

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?

South Coast Air Quality Management District Thresholds

Less Than Significant Impact. The SCAQMD CEQA Air Quality Handbook provides significance thresholds for volatile organic compounds (VOC) (also referred to as reactive organic gases [ROG]), nitrogen oxides (NO_X), carbon monoxide (CO), sulfur oxides (SO_X), particulate matter 10 microns or less in diameter (PM_{10}), and particulate matter 2.5 microns or less in diameter ($PM_{2.5}$). The thresholds apply to both construction and operation for projects located within the SCAQMD jurisdictional boundaries. If the SCAQMD thresholds are exceeded, a potentially significant impact could result. If a project proposes development that would result in criteria pollutant emissions in excess of the established thresholds, as outlined in **Table 5**: *South Coast Air Quality Management District Significance Thresholds,* a significant air quality impact may occur, and additional analysis warranted to fully assess the significance of impacts.[16]

Table 5: South Coast Air Quality Management District Significance Thresholds

Pollutant	Mass Daily Thresholds (pounds per day)	
	Construction	Operations
Nitrogen Oxides (NO_X)	100	55
Volatile Organic Compounds (VOC)[1]	75	55
Particulate Matter up to 10 Microns (PM_{10})	150	150
Particulate Matter up to 2.5 Microns ($PM_{2.5}$)	55	55
Sulphur Oxides (SO_X)	150	150
Carbon Monoxide (CO)	550	550
1. VOCs and reactive organic gases (ROGs) are subsets of organic gases that are emitted from the incomplete combustion of hydrocarbons or other carbon-based fuels. Although they represent slightly different subsets of organic gases, they are used interchangeably for the purposes of this analysis.		
Source: South Coast Air Quality Management District, *South Coast AQMD Air Quality Significance Thresholds*, April 2019.		

Regional Construction

Construction associated with the proposed Project would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the South Coast Air Basin include ozone-precursor pollutants (i.e., ROG and NO_X), PM_{10}, and $PM_{2.5}$. Construction-generated emissions of these criteria pollutants are short-term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated were to exceed the SCAQMD's thresholds of significance.

Construction would result in the temporary generation of criteria pollutant emissions from activities such as demolition, site grading, building construction, architectural coating, motor vehicle exhaust associated with construction equipment, materials deliveries and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are largely generated by motor vehicle exhaust and ground disturbance; the volume of airborne particulate matter

[16] South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993.

is largely dependent on the amount of ground disturbance associated with site preparation activities, as well as weather conditions and the appropriate application of water.

Construction activities for the Project were assumed to begin in January 2023. Construction-generated emissions associated with the proposed Project were calculated using the California Air Resources Board (CARB)-approved California Emissions Estimator Model (CalEEMod), version 2020.4.0, which is designed to model emissions for land use development projects, based on typical construction requirements. It is assumed that all construction equipment operated during each individual phase would be operated simultaneously to provide a conservative analysis. **Table 6:** *Project Construction Equipment,* shows the equipment required for each construction phase and the number of hours per day they would be used. See **Appendix A**, for more information regarding the construction assumptions used in this analysis.

Table 6: Project Construction Equipment

Construction Phase	Equipment	Quantity	Numbers of Hours Used per Day
Demolition	Backhoe	1	8
Foundation/Concrete Pour	Crane	1	8
	Pump	1	8
	Backhoe	1	6
	Forklift	1	7
Grading	Excavator	1	8
	Backhoe	1	7
	Front End Loader	1	7
	Dump Truck	1	8
Building Construction	Air Compressor	1	8
	Crane	1	8
	Forklift	1	7
	Pump	1	8
	Backhoe	1	6
Architectural Coating	Air Compressor	2	6
	Scissor/Boom Lift	2	8
Source: Equipment provided by Project Applicant. Hours of operation based on CalEEMod defaults.			

The predicted maximum daily construction-generated criteria pollutant emissions for the proposed Project are reported in **Table 7**: *Project Construction Emissions.* As noted in **Table 7**, the Project's emissions were calculated assuming mandatory compliance with SCAQMD Rule 403, fugitive dust control measures.

Table 7: Project Construction Criteria Pollutant Emissions

Construction Year	Emissions (pounds per day)[1]					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Year 1 (2023)	1.38	26.57	15.38	0.11	3.29	1.21
Year 2 (2024)	7.17	19.59	25.04	0.05	1.94	1.13
SCAQMD Threshold	75	100	550	150	150	55
SCAQMD Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
1. Mandatory compliance with SCAQMD Rule 403 Fugitive Dust assumed. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. No mitigation was applied to construction equipment. Refer to Appendix A for Model Data Outputs.						
Source: CalEEMod version 2020.4.0. Refer to Appendix A for model outputs.						

The results summarized on **Table 7** show that the Project's regional criteria pollutant emissions during construction would remain below applicable thresholds.

The Project incorporates two Project Design Features (PDFs), PDF-1 and PDF-2 (detailed below), neither of which was assumed when estimating the Project's construction emissions for **Table 7**, above. PDF-1 would reduce the Project's diesel exhaust construction emissions by requiring that all off-road diesel-powered construction equipment greater than 90 horsepower meet CARB Tier 4 Final off-road emissions standards. PDF-2 would also reduce the Project's diesel exhaust construction emissions by requiring that all forklifts be non-diesel forklifts.

PDF AQ-1 **Off-Road Diesel-Powered Construction Equipment.** All off-road diesel-powered construction equipment greater than 90 horsepower would meet California Air Resources Board Tier 4 Final off-road emissions standards. Requirements for Tier 4 Final equipment will be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's Best Available Control Technology (BACT) documentation (certified tier specification or model year specification), and CARB or SCAQMD operating permit (if applicable) will be provided to the City at the time of mobilization of each applicable unit of equipment.

PDF AQ-2: **Off-Road Forklifts.** All forklifts would be non-diesel forklifts. This requirement will be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment.

Project construction would also comply with SCAQMD Rules 402 (Nuisance)[17] and 1113 (Architectural Coatings)[18] and CARB's anti-idling regulations which prohibit idling for more than five minutes; however, compliance with these rules also was not assumed when estimating the Project's construction emissions for Table 7, above. Therefore, the Project's maximum-day construction emissions of criteria pollutants would be even lower than reported in Table 7 if the Project's incorporation of PDF AQ-1 and PDF AQ-2 and its compliance with SCAQMD Rules 402 and 1113 and CARB's anti-idling regulations were taken into account.

The Project would also retain the four existing buildings located at 1128 to 1146 N. Las Palmas Avenue with only minor interior renovations anticipated, but no Project-related exterior renovations, change in use, or expansion of these buildings proposed at this time. Should modifications to the exterior and/or interior of the buildings be undertaken at a future date, heavy-duty equipment would not be required as no demolition or grading activities would be required. Therefore, criteria pollutant emission impacts associated with the potential future renovation of these existing buildings would not be anticipated.

As shown above, the Project's estimated criteria pollutant emissions during construction would be below their respective thresholds such that regional construction impacts would be less than significant and no mitigation measures are required.

[17] SCAQMD Rule 402 prohibits the discharge of quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of people or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or have a natural tendency to cause injury or damage to business or property.

[18] SCAQMD Rule 1113 sets limits on the VOC content of architectural coatings.

Regional Operations

The Project's operational criteria pollutant emissions would be associated with mobile sources (i.e., motor vehicle use) and area sources (such as the use of landscape maintenance equipment, consumer products, and architectural coatings). Energy source emissions would be generated from electricity and natural gas (non-hearth) usage. **Table 8**: *Operational Emissions,* summarizes the operational emissions attributable to the proposed Project (new building and existing square footage to be expanded and converted to office and retail). Existing emissions associated with the 5,498 square feet of manufacturing use that the Project would convert to office and retail space have been calculated and subtracted from the Project's estimated emissions. The existing surface parking lot to be demolished contributes emissions associated with nighttime lighting. However, these emissions would be minimal, and credit has not been taken for their removal.

As shown in **Table 8**, the Project's operational criteria pollutant emissions would not exceed SCAQMD thresholds. Therefore, Project operations would result in less than significant long-term regional air quality impacts.

Table 8: Operational Criteria Pollutant Emissions

Source	Emissions (pounds per day)[1, 2]					
	ROG	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Proposed Project						
Area	1.99	<0.01	0.03	0.00	<0.01	<0.01
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Mobile	2.62	2.88	25.94	0.06	6.48	1.75
Proposed Project Total	**4.84**	**3.04**	**27.11**	**0.06**	**6.72**	**1.82**
Existing to be Removed	*0.22*	*0.16*	*1.14*	*<0.01*	*0.25*	*0.07*
Net Project Emissions	**4.61**	**2.88**	**25.97**	**0.06**	**6.48**	**1.75**
SCAQMD Threshold	55	55	550	150	150	55
SCAQMD Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
1. Emissions were calculated using the California Emissions Estimator Model version 2020.4.0 (CalEEMod), as recommended by the SCAQMD. Worst-case seasonal maximum daily emissions are reported.						
Source: CalEEMod version 2020.4.0. Refer to **Appendix A** for model outputs.						

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact.

Localized Construction Impacts

The nearest sensitive receptors to the Project Site are the residential units located immediately adjacent to and to the south of the Project Site. To assess the potential for Project construction to create impacts to sensitive receptors, the SCAQMD recommends utilizing its Localized Significance Thresholds (LSTs) for construction. The LSTs were developed in response to the SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4) and are based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the state or federal ambient air quality standard (the more stringent of the two). The SCAQMD provided the *Final*

Localized Significance Threshold Methodology (dated June 2003 [revised 2008]) for guidance.[19] The LST methodology assists lead agencies in their project-specific analysis of the potential localized impacts associated with proposed projects.

Since CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment, **Table 9:** *Equipment-Specific Grading Rates* was used to determine the maximum daily disturbed acreage for the LST analysis. For this Project, the appropriate source receptor area (SRA) for the LSTs is the Central LA (SRA 1) area since this area includes the Project Site. LSTs only take into consideration emissions of NO_X, CO, PM_{10}, and $PM_{2.5}$.[20] The SCAQMD produced look-up tables for projects that disturb areas less than or equal to 5 acres in size.[21] Based on the daily equipment modeled in CalEEMod, Project construction is anticipated to disturb approximately 1.5 acres in a single day. Thus, the LSTs applicable to this Project were interpolated using the SCAQMD-produced look up tables for 1 and 2-acre sites.

Table 9: Equipment-Specific Grading Rates

Construction Phase	Equipment Type	Equipment Quantity	Acres Graded per 8-Hour Day	Operating Hours per Day	Acres Graded per Day
Grading	Backhoe	1	0.5	8	0.5
	Grader	1	0.5	8	0.5
	Front Loader	1	0.5	8	0.5
				Total Acres Graded per Day	**1.5**
Source: CalEEMod version 2020.4.0.					

The SCAQMD's methodology states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs."[22] Therefore, for purposes of the construction LST analysis, only the emissions included in the CalEEMod "on-site" emissions outputs were considered. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. SCAQMD's LST guidance recommends using the 25-meter threshold for receptors located 25 meters (or approximately 82 feet) or less from the Project Site.[23] Therefore, the LSTs for 1.5 acres at 25 meters were used for the construction analysis, which is consistent with the SCAQMD LST methodology.

Table 10: *Localized Significance of Construction Emissions,* presents the emissions modeling results for the Project's localized emissions during construction. As stated above, incorporation of PDF-1 and PDF-2 and compliance with SCAQMD Rules 402 and 1113 and CARB anti-idling regulations were not assumed when estimating the Project's localized construction emissions for **Table 10**. Therefore, the Project's maximum-day localized construction emissions would actually be even lower than reported in **Table 10. Table 10**

[19] South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, Revised 2008, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds, Accessed December 2022

[20] Ibid.

[21] South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology, Appendix C – Mass Rate LST Look-up Tables*, Revised 2008, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds, Accessed December 2022

[22] South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, Revised 2008, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds, Accessed December 2022

[23] Ibid

shows that the emissions of these pollutants on the peak day of construction would not exceed the LSTs and therefore would not be expected to create substantial concentrations of pollutants at the sensitive receptors closest to the Project Site or cause or contribute to an exceedance of federal or state ambient air quality standards. Therefore, localized construction impacts would be less than significant, and no mitigation is required.

Table 10: Localized Significance of Construction Emissions

Source/Activity	Emissions (pounds per day)[1,2]			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Demolition (2023)	1.54	2.23	0.66	0.16
Grading (2023)	7.83	10.48	0.37	0.32
Foundations (2023)	8.56	8.23	0.40	0.38
Building Construction (2023)	10.30	10.65	0.50	0.48
Building Construction (2024)	9.57	10.58	0.44	0.42
Architectural Coating (2024)	8.79	11.56	0.45	0.42
Building Construction and Architectural Coating Overlap (2024)	18.36	22.14	0.89	0.84
Maximum Daily Emissions	*18.36*	*22.14*	*0.89*	*0.84*
SCAQMD LST (for 1.5 acres at 25 meters)	91	864	7	4
Maximum Daily Emissions Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**

1. CalEEMod version 2020.4.0. Worst-case seasonal maximum daily emissions are reported.
2. Mandatory compliance with SCAQMD Rule 403 Fugitive Dust applied for construction emissions. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. No mitigation was applied to construction equipment.

Source: CalEEMod version 2020.4.0. Refer to Appendix A for model outputs.

Localized Operational Impacts

According to the SCAQMD localized significance threshold methodology, operational LSTs apply only to on-site sources.[24] LSTs for receptors located at 25 meters for SRA 1 were utilized in this analysis. The 2.0-acre LST threshold was conservatively used for the Project Site.[25] The on-site operational emissions were calculated using CalEEMod and are compared to the LST thresholds in **Table 11:** *Localized Significance of Operational Emissions*.

Table 11: Localized Significance of Operational Emissions

Activity	Emissions (pounds per day)[1, 2]			
	NO_X	CO	PM_{10}	$PM_{2.5}$
On-Site Emissions (Area and Energy Sources)	0.0003	0.0306	0.0001	0.0001
SCAQMD Localized Screening Threshold (adjusted for 2.0 acre at 25 meters)	*108*	*1,048*	*2*	*2*
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**

1. Emissions were calculated using the California Emissions Estimator Model version 2020.4.0 (CalEEMod), as recommended by the SCAQMD. Worst-case seasonal maximum daily emissions are reported.
2. On-site emissions consist of area sources and energy sources.

Source: CalEEMod version 2020.4.0. Refer to Appendix A for model outputs.

[24] Ibid.

[25] Construction LST analysis is based on the amount of daily ground disturbance, which was calculated to be 1.5 acres. For operations, the size of the Project Site has been used.

The operational emissions shown on **Table 11** include all on-site Project-related sources (i.e., area and energy). As stated above, compliance with SCAQMD Rules 402 and 1113 and CARB anti-idling regulations have not been assumed when estimating the Project's localized operational emissions for **Table 11.** Therefore, the Project's maximum-day localized operational emissions would in fact be even lower than reported in **Table 11**. The results of the LST analysis show that the Project would not cause or contribute to an exceedance of federal or state ambient air quality standards. Therefore, the Project would result in less than significant impacts concerning LSTs during operational activities and no mitigation is required.

Carbon Monoxide Hotspots

An analysis of CO "hot spots" is needed to determine whether the change in the level of service (LOS) of an intersection as a result of Project activities would have the potential to result in exceedances of the CAAQS or NAAQS. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined.

Accordingly, with steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard. An analysis prepared for CO attainment in the South Coast Air Basin by the SCAQMD can assist in evaluating the potential for CO exceedances. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 *Air Quality Management Plan* and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan).[26,27] As discussed in the 1992 CO Plan, peak carbon monoxide concentrations in the Air Basin are due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. Considering the region's unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of the 1992 CO Plan and subsequent plan updates and air quality management plans. The Basin was re-designated as attainment in 2007 and CO is no longer addressed in the SCAQMD's Air Quality Management Plan (AQMP).

In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which had a daily traffic volume of approximately 100,000 vehicles per day.

The 2003 *Air Quality Management Plan* is the most recent AQMP that addressed CO concentrations. As part of the 2003 AQMP CO Modeling Attainment Demonstration, an updated analysis was performed based on the 1992 CO Plan using more recent modeling techniques (dispersion modeling, emission

[26] South Coast Air Quality Management District, *Air Quality Management Plan, Appendix V, Modeling and Attainment Demonstrations*, August 2003.

[27] South Coast Air Quality Management District*, Federal Attainment Plan for Carbon Monoxide*, 1992.

factors).[28] The Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 parts per million (ppm), which is well below the 35-ppm federal standard.

By contrast, the proposed Project would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD's 2003 CO hot-spot analysis. According to daily traffic volume data, Las Palmas between Lexington and Santa Monica has an existing vehicle count of 5,733, Santa Monica between Highland and Las Palmas has an existing vehicle count of 47,083, and Santa Monica between Seward and Las Palmas has an existing vehicle count of 47,726. As CO hotspots were not created at the Wilshire Boulevard/Veteran Avenue intersection even as it accommodated 100,000 vehicles daily, it can be reasonably inferred that CO hotspots would not be experienced at any of the intersections in the vicinity of the Project Site from an additional 925 daily vehicle trips attributable to the Project. Therefore, impacts would be less than significant, and no mitigation is required.

d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?

Less Than Significant Impact. The SCAQMD *CEQA Air Quality Handbook* identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding.[29] The Project would not include any of the land uses that have been identified by the SCAQMD as odor sources.

During construction-related activities, some odors (not substantial pollutant concentrations) that may be detected are those typical of construction vehicles (e.g., diesel exhaust from grading and construction equipment). These odors would be temporary, would be typical of construction projects, and would disperse rapidly. Furthermore, odors that could be generated by construction activities are required to follow SCAQMD Rule 402 (Nuisance) to prevent odor nuisances on sensitive land uses. Therefore, the Project would not create objectionable odors, and no mitigation is required.

Cumulative Impacts

Cumulative Short-Term Emissions

The South Coast Air Basin (SCAB) is designated nonattainment for O_3, PM_{10}, and $PM_{2.5}$ for State standards and nonattainment for O_3 and $PM_{2.5}$ for national standards. Appendix D of the SCAQMD White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (2003) notes that projects that result in emissions that do not exceed the project-specific SCAQMD regional thresholds of significance should result in a less than significant impact on a cumulative basis unless there is other pertinent information to the contrary.[30] The mass-based regional significance thresholds published by the

[28] South Coast Air Quality Management District, Air Quality Management Plan, Appendix V, Modeling and Attainment Demonstrations, August 2003.

[29] South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993.

[30] South Coast Air Quality Management District, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, August 2003. http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf, Accessed December 2022

SCAQMD are designed to ensure compliance with both NAAQS and CAAQS and are based on an inventory of projected emissions in the SCAB. Therefore, if a project is estimated to result in emissions that do not exceed the thresholds, the project's contribution to the cumulative impact on air quality in the SCAB would not be cumulatively considerable. As shown above, Project construction-related emissions by themselves would not exceed the SCAQMD significance thresholds for criteria pollutants. Therefore, the proposed Project would not result in a cumulatively considerable contribution to air pollutant emissions during construction.

The SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the FCAA mandates. As discussed above, the Project is consistent with the AQMP and the City's General Plan. The analysis assumed fugitive dust controls would be utilized during construction, including frequent water applications. SCAQMD rules, mandates, and compliance with adopted AQMP emissions control measures would also be imposed on construction projects throughout the SCAB, which would include related projects. Compliance with SCAQMD rules and regulations would further reduce the Project construction-related impacts. Therefore, Project-related construction emissions, combined with those from other projects in the area, would not substantially deteriorate local air quality. Construction emissions associated with the Project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

Cumulative Operational Impacts

The SCAQMD has not established separate significance thresholds for cumulative operational emissions. A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or state non-attainment pollutant. Because the Los Angeles County portion of the Air Basin is currently in nonattainment for ozone, NO_2, PM_{10}, and $PM_{2.5}$, cumulative projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. Cumulative impacts to air quality are evaluated under two sets of thresholds for CEQA and the SCAQMD. In particular, Section 15064(h)(3) of the CEQA Guidelines provides guidance in determining the significance of cumulative impacts. Specifically, Section 15064(h)(3) states in part that:

> *"A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency…"*

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the Project's incremental contribution to cumulative air quality impacts is determined based on compliance with the SCAQMD adopted AQMP. The Project would not conflict with or obstruct implementation of AQMP and would be consistent with the growth projections in the AQMP. Nonetheless, SCAQMD no longer recommends relying solely upon consistency with the AQMP as an appropriate methodology for assessing cumulative air quality impacts. The SCAQMD developed the

operational thresholds of significance based on the level above which individual project emissions would result in a cumulatively considerable contribution to the SCAB's existing air quality conditions. Therefore, a project that exceeds the SCAQMD operational thresholds would also be a cumulatively considerable contribution to a significant cumulative impact.[31]

As shown above, the Project operational emissions would not exceed SCAQMD thresholds. As a result, operational emissions associated with the Project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. Additionally, adherence to SCAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Project operations would not result in an incremental contribution to long-term emissions of non-attainment pollutants and ozone precursors, considered together with cumulative projects, would not be cumulatively considerable, and therefore the cumulative impact of the Project would be less than significant.

4.4 BIOLOGICAL RESOURCES

ENVIRONMENTAL Issues	IMPACTS	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
BIOLOGICAL RESOURCES. 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 Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒
c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐

[31] South Coast Air Quality Management District, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, August 2003. http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf, Accessed December 2022

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

The following discussion regarding biological resources is based, in part, on the tree evaluation report prepared for the Project, entitled *1128-1146 N. Las Palmas Ave., 1139-1149 Las Palmas Ave., 1138-1140 McCadden Pl., Los Angeles, CA 90038,* prepared by Paul Lewis Landscape Architect, dated September 27, 2021, and contained in Appendix B.

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 Game or U.S. Fish and Wildlife Service?

Less than Significant Impact. The Project Site is located in an urbanized and developed area of the City and consists of surface parking and existing buildings. The Project Site does not contain any habitat capable of sustaining 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 (CDFW) or U.S. Fish and Wildlife Service (USFWS). [32],[33],[34] Additionally, there are no known locally designated natural communities at the Project Site or in the immediate vicinity, nor is the Project Site located immediately adjacent to undeveloped natural open space or a natural water source that may otherwise serve as habitat for state or federally listed species. Species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings.

The City of Los Angeles Protected Tree and Shrub Ordinance (Ordinance 186873, LAMC Chapter IV, Article 6) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, California Bay trees, Mexican Elderberry shrubs, and Toyon shrubs of at least 4 inches in diameter at breast height or four and one-half feet above the ground level at the base of the tree or shrub. These tree and shrub species are defined as "protected" by the City of Los Angeles. Trees or shrubs that have been planted as part of a tree planting program are exempt from the City's Protected Tree and Shrub Ordinance and are not considered protected. The City's Protected Tree and Shrub Ordinance prohibits, without a permit, the removal of any regulated protected tree, including "acts that inflict damage upon root system or other parts of the tree or shrub…" The

[32] Los Angeles County. Significant Ecological Areas and Coastal Resource Areas Policy Map. Available: http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf. Accessed: September 9,2022.

[33] California Department of Fish and Wildlife. California Regional Conservation Plan. August 2015. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline. Accessed: September 9,2022.

[34] U.S. Fish and Wildlife Service, National Wetlands Inventory.www.fws.gov/wetlands/Data/Mapper.html, Accessed: September 9,2022.

protected tree or shrub must be replaced within the property by at least four specimens of a protected variety, except where the protected species is relocated pursuant to the LAMC. In addition, a protected tree shall only be replaced by other protected tree varieties and shall not be replaced by shrubs. A protected shrub shall only be replaced by other protected shrub varieties and shall not be replaced by trees, to the extent feasible as determined by the Advisory Agency, Board of Public Works, or a licensed or certified arborist.

There are five existing trees on the Project Site and one street tree on N. McCadden Place. Four Queen Palms (Syagrus romanzoffiana) are located on the eastern portion of the Project Site along the east side of N. Las Palmas in front of Buildings C-F. The Project would maintain the four Queen Palms on the eastern portion of the Project Site. On the western portion of the Project Site is one on-site Mexican fan palm (Washingtonia robusta) and one street tree: a Callery pear (Pyrus calleryana). None of the trees are considered to be protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.[35] Furthermore, any removal of street trees would require approval from the City of Los Angeles Bureau of Street Services.

The Project proposes to remove the one on-site tree and one street tree on the western portion of the Project Site and provide a total of 13 trees in the western portion of the Project Site. These trees would include the following: four Peppermint Willows (*Agonis Flexuosa*), one Cootamundra Wattle *(Acacia Bailyena*), and one Brisbane Box (*Lophostemon Confertus*) at the ground level and five Manzanita Trees (*Arctostaphylos Manzanita*) on 3rd floor terrace of Building A. Two new street trees would be provided along N. McCadden Place to the satisfaction of the Urban Forestry Division, Bureau of Street Services requirements for a 2:1 ratio.

The removal and placement of street trees would be subject to the review and approval of the Board of Public Works, Urban Forestry Division. Prior to the issuance of any permit, a plot plan must be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way (see RCM-BIO-1, below) and per Section 62.177 of the LAMC, the Applicant must pay an in-lieu tree replacement fee for any trees removed in the public right-of-way that cannot be replaced on site. Therefore, the Project would have a less than significant impact upon removal of a non-protected tree.

While the Project would provide more trees than occur under existing conditions, the two trees removed by the Project could potentially have provided nesting sites for migratory birds; therefore, removal of one or both of these trees could potentially create an adverse effect on migratory birds. However, all migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R Section 10.13), and by Sections 3503, 3503.5 and 3513 of the California Fish and Game Code, which prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). The Department of City Planning enforces the MBTA and state protections through precautionary and preventative measures to avoid or reduce the potential for disturbances to wildlife during construction. The Project would be required to comply with all applicable laws and regulations to ensure that no significant impacts to nesting birds would occur due

[35] Tree Evaluation Report: *1128-1146 N. Las Palmas Ave., 1139-1149 Las Palmas Ave., 1138-1140 McCadden Pl., Los Angeles, CA 90038* contained in **Appendix B**.

to the Project's removal of the two existing trees. As a standard practice, the Department of Building and Safety requires the enforcement of regulatory compliance measure RCM-BIO-2, compliance with which would avoid any potential impacts related to nesting birds during construction activities. Therefore, with adherence to the requirements of existing laws and regulations, the Project would have a less than significant impact on sensitive biological species or habitat, and no mitigation measures are required.

Regulatory Compliance Measures

RCM-BIO-1: Tree Removal (Public Right-of-Way). Removal of trees in the public right-of way requires approval by the Board of Public Works. The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works. Per Section 62.177 of the LAMC, the Applicant shall pay an in-lieu tree replacement fee for any trees removed in the public right-of-way that cannot be replaced on site.

RCM-BIO-2: Proposed Project activities (including disturbances to native and non-native vegetation, structures, and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code Section 86).

If Project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:

- Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
- If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31.
- Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.
- The Applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the Project.

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 Game or U.S. Fish and Wildlife Service?

No Impact. The Project Site is located within a developed, urban portion of the City and no watercourses, riparian habitat, including wetlands,[36] or other sensitive natural communities, such as Significant Ecological Areas or Coastal Resource Areas,[37] exist or are mapped on or near the Project Site. Since neither the Project Site nor adjacent areas are within a biological resource area or Significant Ecological Area, implementation of the Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities. As such, the Project would not have the potential to adversely affect riparian habitat or other sensitive natural communities. Therefore, no impact would occur, and no mitigation measures are required.

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?

No Impact. As previously discussed, no wetlands exist or are mapped on or near the Project Site.[38] In addition, the Project does not propose any filling or grading of any ravines or other hydrologically low-lying areas that may contain intermittent waterbodies. As such, the Project would not have the potential to affect wetlands. As discussed above, no riparian or other sensitive habitat areas are located on or adjacent to the Project Site. As discussed above, neither the Project Site nor adjacent areas are within a biological resource area or Significant Ecological Area. Thus, implementation of the Project would not result in any adverse impacts to state or federally protected wetlands such as marshes vernal pools, or coastal areas. Therefore, no impact would occur, and no mitigation measures are required.

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?

Less than Significant Impact. The Project Site is currently developed and located in a highly urbanized area in the City. No wildlife corridors or native wildlife nursery sites are present on the Project Site or in the surrounding area. Furthermore, due to the urbanized nature of the Project Site area, the potential for native resident or migratory wildlife species movement through the Project Site is negligible.

Nonetheless, the Project Site does include non-native trees that could support raptor and/or songbird nests. The Project proposes to remove the one on-site tree and one street tree on the western portion of the Project Site. However, and provide a total of 13 trees in the western portion of the Project Site: an increase of 11 trees over existing conditions.

The Project would be required to comply with the Migratory Bird Treaty Act (MBTA) and state laws, which would reduce its potential impacts to migratory bird species that could potentially nest in the two trees

[36] Los Angeles County. Significant Ecological Areas and Coastal Resource Areas Policy Map. Available: http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf. Accessed: September 9,2022.

[37] California Department of Fish and Wildlife. California Regional Conservation Plan. August 2015. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline. Accessed: September 9,2022

[38] U.S. Fish and Wildlife Service, National Wetlands Inventory. www.fws.gov/wetlands/Data/Mapper.html, Accessed: September 9,2022.

that would be removed as part of the Project. Thus, the Project would not interfere substantially with the movement of any native resident or migratory fish, wildlife species, or with established native resident or migratory wildlife corridors, and/or impede the use of native wildlife nursery sites. As such, the Project would not interfere substantially with the movement of any native resident or migratory fish, wildlife species, or with established native resident or migratory wildlife corridors, and/or impede the use of native wildlife nursery sites. Therefore, the Project's potential impacts would be less than significant, and no mitigation measures are required.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. There are no native tree species within the Project Site that would be subject to the protection of Ordinance No. 177404 of the LAMC (Section 1, Subdivision 12, of Subsection A of Section 12.21, as amended). The Project proposes to remove the one on-site tree and one street tree on the western portion of the Project Site and provide a total of 13 trees in the western portion of the Project Site including two new street trees.

As discussed above, the removal and placement of street trees would be subject to the review and approval of the Board of Public Works, Urban Forestry Division. Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way (RCM-BIO-1) and per Section 62.177 of the LAMC, the Applicant must pay an in-lieu tree replacement fee for any trees removed in the public right-of-way that cannot be replaced on site. The Project would be required to comply with the Federal Migratory Bird Treaty Act and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, which prohibit take of all birds and their active nests including raptors and other migratory nongame birds (RCM-BIO-2).

Thus, the Project's potential impacts related to the loss of on-site trees would be less than significant, and no mitigation measures are required.

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?

No Impact. The Project Site is currently developed and located in an urbanized area of the City. As discussed above, there are no identified Significant Ecological Areas (SEAs) on the Project Site or within the vicinity of the Project Site,[39] and the Project Site is not subject to any Habitat Conservation Plans, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.[40] As such, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impacts would occur, and no mitigation measures are required.

Cumulative Impacts

The Project Site is located in a highly urbanized area and does not serve as habitat for fish or wildlife species. In addition, no sensitive plant or animal community or special status species occur on the Project

[39] City of Los Angeles, General Plan Conservation Element, Adopted September 26, 2001, Exhibit B2.

[40] City of Los Angeles, Zone Information and Map Access System (ZIMAS), available at: http://zimas.lacity.org.

Site and no special-status wildlife or fish species are considered to have a moderate or high potential for occurrence in the Project Site area, the Project would not remove protected trees, and the Project would not conflict with the provisions of an HCP, Natural Community Conservation Plan or other such plan. The Project would also be required to comply with the Migratory Bird Treaty Act (MBTA) and state laws, which would reduce its potential impacts to migratory bird species. Thus, the Project would not interfere substantially with the movement of any native resident or migratory fish, wildlife species, or with established native resident or migratory wildlife corridors, and/or impede the use of native wildlife nursery sites.

In addition, as with the Project, the related projects would be required to comply with the City's Protected Tree Ordinance, the Migratory Bird Treaty Act, and other applicable biological resources regulations, as well as with CEQA for those projects subject to CEQA review. Furthermore, to the extent that the related projects would result in significant impacts to biological resources, they would be required to implement mitigation to reduce/avoid the impacts. Thus, as the Project would not result in significant impacts to biological resources, the Project would not contribute considerably to cumulative biological resources impacts. As such, cumulative biological resources impacts would be less than significant.

4.5 CULTURAL RESOURCES

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

The following discussion regarding Cultural Resources is based, in part, on the technical report prepared for the Project, entitled *1149 Las Palmas Project Historical Resources Technical Report* (Historic Report), prepared by *Architectural Resources Group, (ARG) Consulting, in November 2022* and contained in Appendix C. Additional cultural resources technical reports include the *Phase I Cultural Resources Assessment: 1151 N. Las Palmas Avenue,* prepared by Material Culture Consulting, Inc*, May 2023, Paleontological Resources Assessment: 1151 N. Las Palmas Avenue Project,* prepared by *Material Culture Consulting Inc., December 2022,* and *Tribal Cultural Resources Assessment: 1151 N. Las Palmas* prepared by Material *Culture Consulting Inc., January 2023.*

a) Cause a substantial adverse change in the significance of a historical resource pursuant to in § 15064.5?

Less than Significant Impact.

The term "historical resource" includes, but is not limited to, "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (California PRC Section 5020.1(j)). In 1992, the California legislature established the California Register of Historical Resources (California Register) "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1(a)). The criteria for listing resources on the California Register were expressly developed to be in accordance with criteria developed for listing in the National Register of Historic Places (National Register), enumerated below. According to PRC Section 5024.1(c)(1–4), a resource is considered historically significant if it: (i) retains "substantial integrity"; and (ii) meets at least one of the following criteria:

(1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

(2) Is associated with the lives of persons important in our past.

(3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

(4) Has yielded, or may be likely to yield, information important in prehistory or history.

As discussed in the Historic Report, in order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the California Register if it can be demonstrated that sufficient time has passed to understand its historical importance (see 14 California Code of Regulations [CCR] § 4852(d)(2)).

The California Register protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the California Register are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the National Register are automatically listed in the California Register as are the state landmarks and points of interest. The California also includes properties designated under local ordinances or identified through local historical resource surveys.

Section 15064.5 of the CEQA Guidelines generally defines a historic resource as a resource that is: (1) listed in, or determined to be eligible for listing in the CRHR; (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code). 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 an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register.

Buildings on the Project Site

The Project Site encompasses multiple parcels and is developed with non-historic surface parking lots and five industrial buildings that are over 45 years of age. Each property is addressed in more detail below:

1128 N. Las Palmas Avenue

The building at 1128 N. Las Palmas Avenue was constructed in 1925 to serve as a plant for the Hollywood Carpet Cleaning Company. The building is a one-story industrial/commercial building reflecting a modest Mediterranean Revival style. It has a rectangular footprint and is constructed of both wood framing and brick (originally unreinforced). The building has brick cladding at its secondary elevations and textured stucco at the primary (west) façade. It is fronted by a metal security fence, with swinging gates in front of two entries.

The property was used as a carpet cleaning plant, a shop, office. Minor modifications to the building include the pent roof tile removal, addition of security features, and signage changes.

1134-36 N. Las Palmas Avenue

The building was constructed for use as a warehouse in 1950-51. The building is a two-story industrial/ commercial building reflecting a utilitarian, commercial vernacular idiom. It has a rectangular footprint and is wood framed, with brick cladding. It was used as a warehouse until 1963 when it was converted in part to office space. In 1977, the building was converted from a warehouse into a photo studio by new occupant (and probable owner) Reid Miles, Inc. Reid Miles was a significant graphic designer and photographer, and this property was his photography studio for 16 years, at the height of his productive period as a photographer.

After Miles' death in 1993, 1136 N. Las Palmas was owned and occupied by a series of businesses, including other commercial photographers; between 2000 and 2012. Interior connections between the three buildings 1144-46, 1138, and 1134-36 N. Las Palmas, which resulted in combining them into a single complex, were made by adjacent occupants between 2002 and 2007.

1138 N. Las Palmas Avenue

The building at 1138 N. Las Palmas Avenue was constructed in 1946-1947 as an office and shop building for the Bishop Machine Works. The building is a one-story industrial/commercial building reflecting a utilitarian, commercial vernacular idiom with Mid-Century Modern elements. It has a roughly rectangular footprint and is constructed of reinforced brick, with smooth stucco cladding at the primary (west) facade. The building occupies its entire lot, and its north and south walls directly abut those of the buildings to either side, obscuring them.

The building's architect, Kenneth R. Swift, was a prolific Los Angeles practitioner who designed residential and commercial properties. By the 1950s, Swift had found a niche creating Modern designs for commercial properties like offices and retail buildings, with transportation buildings of particular note. Swift's 1946 design for the new Bishop Machine Works building at 1138 N. Las Palmas Avenue appears to have been Modern, with a flat roof, recessed entry with canopy at the south end of the primary façade, and flush grouped windows at the north end.

In 1963. E.R. including interior alterations and re-configuration of the entire primary façade occurred. In 2002 a concrete access ramp was added to the front of the building. Exterior alterations dating to the period after 2002 include the replacement of the primary door and its sidelight window. Interior connections between the three buildings 1138, 1144-46, and 1134-36 N. Las Palmas, which resulted in combining them into a single complex, occurred between 2002 and 2007.

1144-46 N. Las Palmas Avenue

Constructed 1941, the building at 1144-46 N. Las Palmas Avenue is a two-story industrial/commercial building reflecting a utilitarian, commercial vernacular idiom. It has a rectangular footprint and is wood-framed, with brick cladding. The building's primary (west) façade, flat-roofed with a flat parapet, fronts the rest of the building, which has shallowly barrel-vaulted roofs with sawtooth daylight roof monitors.

The building was originally used as a machine shop. Sometime in the early 2000s, major alterations occurred at the building's primary façade, including replacement of all doors and windows; resizing of first story window openings and former vehicular entries; and addition of an access ramp. Interior connections

between the three buildings 1144-46, 1138, and 1134-36 N. Las Palmas, which resulted in combining them into a single complex, also appear to have been made between 2002 and 2007.

1155 N. Las Palmas Avenue

Constructed in 1955, the building at 1155 N. Las Palmas Avenue is a one-story industrial building reflecting a utilitarian, commercial vernacular idiom. It has a rectangular footprint and is wood-framed, with brick and smooth stucco cladding. The building has a barrel-vaulted roof covered with composition shingles and rolled asphalt, featuring large sawtooth daylight roof monitors containing fixed metal windows.

Originally constructed as a machine shop it was extensively altered the interior and exterior of the building in the 1990s and 2000s. Between 2007 and 2009, a brick wall was added with new fenestration at the south elevation. The primary façade was altered by modifying and adding entries and constructing the projecting angled, glazed bay that now dominates the façade.

Previous Evaluations and Studies

None of the properties on the Project Site has been designated under any local, state, or federal registration program. Four of the five have not been either identified or evaluated as potential historic resources, or as elements of a potentially eligible historic district, in any known historic resources inventory or survey, including the Los Angeles Citywide Survey (SurveyLA) of the Hollywood Community Plan Area conducted in 2011 (revisions in November 2015), and are not listed in the California Built Environment Resource Directory (BERD) database or in the records of the South Central Coastal Information Center (SCCIC).

The fifth property, 1128 N. Las Palmas Avenue, is listed in the BERD with a 7N California Historical Resource Status Code ("Needs to be reevaluated"). The project and date for this assessment are not known. The building was not identified in SurveyLA.

SurveyLA identified the larger area in which the Project Site is located as the Entertainment Industry Support Services Planning District, containing over 750 buildings, and roughly bounded by Formosa Avenue to the west, Lexington Avenue to the north, Lillian Way to the east, and Melrose Avenue to the south. While SurveyLA identified it as "the most significant collection of entertainment industry-related support services buildings in Hollywood," it found that the area did not retain "sufficient integrity and/or cohesion to qualify as a historic district."[41] SurveyLA planning districts are identified because they may warrant special consideration for local planning purposes; however, they do not meet the definition of a historical resource under CEQA, nor do any of the properties within their boundaries.[42]

Direct Impacts Evaluation

1128 N. Las Palmas Avenue

As analyzed in the Historic Report*,* the buildings at 1128 N. Las Palmas Avenue, 1138 N. Las Palmas Avenue, 1144-46 N. Las Palmas Avenue and 1155 N. Las Palmas Avenue are not individually eligible for

[41] SurveyLA Historic Resources Survey Report Appendix: Hollywood Historic Districts, Planning Districts and Multi-Property Resources – 11/23/15, 389.

[42] 1149 Las Palmas Project Historical Resources Technical Report (Historic Report), prepared by Architectural Resources Group, (ARG) Consulting, in November 2022 and contained in Appendix C.

listing in the National Register, California Register, or as a Los Angeles Historic Cultural Monument (HCM). Additionally, the buildings do not appear eligible as contributors to a potential historic district/Historic Preservation Overlay Zone (HPOZ) and are not historical resources under CEQA. Because these buildings do not meet the definition of a historical resource under CEQA, the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 with respect to any of them.

1134-36 N. Las Palmas Avenue

As analyzed in the Historic Report, the property at 1134-36 N. Las Palmas Avenue is determined, for the purposes of this CEQA analysis, to be potentially individually eligible for listing in the California Register and as a Los Angeles HCM solely due to its association with a significant individual, Reid Miles, who was a prominent photographer/graphic designer. Due to the relatively late date of its significant association with this individual, the building does not appear to be eligible for listing in the National Register. It also does not appear to be a contributor to a potential historic district or Los Angeles HPOZ. The building's period of significance under California Register/Los Angeles Criteria 2/2 is defined as 1977-1993, coinciding with Miles' occupation of the property as his photography studio.

As evaluated in the Historic Report, the Project would not result in the demolition of the building. It also would not result in any exterior changes to the building, meaning the building would continue to retain all of its character-defining features, as follows:

- Two-story height
- Boxy, rectangular plan
- Flat parapet at primary façade, shielding industrial roof behind
- Brick cladding
- Grouped, steel multi-light windows with shared simple brick frame and metal awnings
- Vehicular entrance with roll-up door
- Angled, recessed primary entry with oversized "1136" address signage, cantilevered concrete canopy, and integral planter

The Project may make minor tenant improvements to the building's interior, but as no interior character-defining features related to the historically significant occupancy by the Reid Miles photo studio remain, these alterations would not result in the loss of any character-defining features. The Project would retain the building's existing setback and relationship to the rest of the street and the other buildings on the east side of N. Las Palmas Avenue within the Project Site. The Project would result in some changes to setting, but these would all be on the west side of N. Las Palmas Avenue, which has already experienced extensive changes to the historic streetscape.

Based on a review of all Project plans and other documents, the Historic Report has determined that the Project would not significantly impact the building's integrity of location, design, materials, workmanship, feeling, and association, and that it would not further materially compromise the building's integrity of setting, which has previously been lost due to prior changes to its surroundings. Therefore, development of the Project would not materially impair 1134-36 N. Las Palmas Avenue or its immediate surroundings

because it would retain sufficient integrity to convey its potential historic significance and would remain potentially eligible for listing in the California Register and designation as a Los Angeles HCM. Because the Project would comply with the Secretary of the Interior's Standards for Rehabilitation and preserve all the physical characteristics of the building that convey its potential historical significance and potential eligibility for listing in the California Register and as a Los Angeles HCM, the Project would not result in a substantial adverse change in the potential historical significance of the resource.

As such, direct impacts on the historical resources located on the Project Site would be less than significant and no mitigation measures would be required.

Indirect Impacts

The Project would not have an indirect impact on any historical resources located in the vicinity of the Project Site. For these purposes, "vicinity" is defined as directly adjacent to the Project Site and/or within view of or from the Project Site, and thus having the potential to impact important viewsheds, if any, and/or a historical resource's integrity of setting and feeling. There are four properties identified below located in the vicinity of the Project Site that are conservatively treated as historical resources for the purposes of this CEQA analysis:

- 1161 N. Las Palmas Avenue (1939)
- 1025 N. Highland Avenue (Toberman Storage Company, 1925)
- 6700 Santa Monica Boulevard (Kodak Corporation, 1929)
- 1040 N. Las Palmas Avenue (Hollywood Center Studios Historic District, 1927)

While many more historical resources and potential historical resources are present within a quarter-mile radius of the Project Site, they are not directly adjacent to the Project Site or within view of or from the Project Site. The low scale of most of the area's historical resources, as well as the low scale of the 1100 block of N. Las Palmas located within the Project Site, means that taller intervening construction, both historic and modern, obscures any views to or from these potential historical resources from the Project Site.

An evaluation of indirect impacts of the above four properties identified in the vicinity of the Project Site that are conservatively treated as historical resources is provided below:

1161 N. Las Palmas Avenue

The industrial building at 1161 N. Las Palmas Avenue is adjacent to the Project Site, on the parcel immediately north of 1155 N. Las Palmas Avenue (which the Project proposes to alter) and directly abutting it. The Project proposes construction of an addition to the north portion of the primary (east) façade of 1155, which would bring that portion of the façade closer to the same setback line as 1161, though remaining shallowly set back from that line. As a result, the addition to 1155 N. Las Palmas Avenue would partially obscure more of the featureless brick side (south) elevation of 1161 N. Las Palmas Avenue. The remaining patio area of 1155 N. Las Palmas Avenue would be repurposed for a retail function. The rest of the exterior of 1155 N. Las Palmas would also be altered, including reconfiguration of the visible primary (east) and side (south) façades to reflect new office use and retail storefront; however, the building would remain one story in height, retain its overall footprint and its distinctive sawtooth roof

monitors, and incorporate exterior materials including brick and steel. Therefore, its scale, massing, and materials would remain compatible with that of 1161 N. Las Palmas Avenue.

The construction of the Project's new three-story office building on the parcels south of 1155 N. Las Palmas Avenue would return a building (albeit larger, and office rather than industrial) to parcels that were once developed with industrial buildings. The new building would be visible from the corner of N. Las Palmas Avenue and Lexington Avenue, where 1161 N. Las Palmas is located, but would not directly abut 1161 N. Las Palmas Avenue. As integrity of setting has already been lost in this area due to the development of modern residential and mixed-use developments five to seven stories in height, the resource's setting would not be affected by the construction of a three-story building two parcels to the south.

Following completion of the Project, 1161 N. Las Palmas Avenue (and its immediate surroundings) would continue to convey all of its existing historic physical characteristics that may make it eligible for designation and would retain all aspects of integrity it is currently presumed to possess. Therefore, the Project would not have any indirect impacts on the potential historical resource.

1025 N. Highland Avenue

The Toberman Storage Company building is a 14-story Art Deco tower constructed as a storage facility in 1925. Due to its tall height (unusual for this area), it is distantly visible from the Project Site and has distant views of the Project Site. The resource does not have a historically significant association with the area of the Project Site, and the views between the Toberman building and the Project Site are not character-defining or important. Due to its relatively low scale, the Project would not change any views to or from this resource that have not already been impeded by higher-scale intervening development, particularly along Santa Monica Boulevard. The resource would continue to convey all of the important historic and physical characteristics that make it eligible for designation following completion of the Project and would retain all aspects of integrity that it currently has upon Project completion. The Project would not have any indirect impacts on 1025 N. Highland Avenue or its immediate surroundings.

6700 Santa Monica Boulevard

The Kodak Corporation building is a two-story Mediterranean Revival industrial building repurposed in the 2010s as creative office space. Located at the southwest corner of Santa Monica Boulevard and N. Las Palmas Avenue, the resource has distant partial views to and from the Project Site (specifically the east side of the 1100 block of N. Las Palmas Avenue). The building does not have a historically significant association with the area of the Project Site and the views between the two are not character-defining or important. As it would restrict new construction to the west side of N. Las Palmas Avenue and would not change the buildings along the east side, the Project would not change any existing views to or from this resource. Broader views to this resource that may have once existed have already been impeded by higher-scale intervening development along Santa Monica Boulevard and N. Las Palmas Avenue. The resource would continue to convey all of the important historic and physical characteristics that may make it eligible for designation following completion of the Project and would retain all aspects of integrity that it currently has upon Project completion. The Project would not have any indirect impacts on 6700 Santa Monica Boulevard or its immediate surroundings.

1040 N. Las Palmas Avenue

The Hollywood Center Studios Historic District is a 1927 film studio complex of multiple buildings occupying a "superblock" bounded roughly by N. Las Palmas Avenue, Romaine Street, Seward Street, and the rear parcel lines of buildings fronting on Santa Monica Boulevard. The resource has distant partial views to and from the Project Site. The district does not have a historically significant association with the area of the Project Site and the views between the two are not character-defining or important. As the Project's low-scale new construction would not block any existing views or change the buildings along the east side of the 1100 block of N. Las Palmas Avenue, the Project would not change any existing views to or from this resource. Broader views that may have once existed have already been impeded by higher-scale intervening development along Santa Monica Boulevard and N. Las Palmas Avenue. The resource would continue to convey all of the important historic and physical characteristics that make it eligible for designation following completion of the Project and would retain all aspects of integrity that it currently has upon Project completion. The Project would not have any indirect impacts 1040 N. Las Palmas Avenue or its immediate surroundings.

Historic District/Los Angeles Historic Preservation Overlay Zone

The subject properties' surroundings, both inside and outside of the Project Site, were industrial at the time the buildings were constructed; as of 2022, they are mixed industrial, commercial, residential, and institutional in nature, and reflect a wide range of construction dates, scales, and architectural styles. Two large surface parking lots have replaced older historic buildings on the west side of the block, and as noted above, most of the subject properties themselves have experienced substantial alterations that have reduced, if not eliminated, their ability to convey any significant associations either individually or as part of a grouping. A single, cohesive development pattern is no longer represented on this block of N. Las Palmas Avenue, and this area was not identified as a potential historic district or HPOZ in the Hollywood CPA during SurveyLA.

As a result, none of the buildings on the Project Site appear to be contributors to a potential historic district or Los Angeles HPOZ. As such, there would be no impacts on historical resources.

As such, the Project would have no indirect impacts on the historical resources in the study area and no mitigation measures would be required.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Less than Significant Impact with Mitigation Incorporated. The *Phase I Cultural Resources Assessment: 1151 N. Las Palmas Avenue*, prepared by Material Culture Consulting, Inc., includes a California Historical Resources Information System (CHRIS) records search at the South Central Coastal Information Center (SCCIC), background/ literature research, a search of the Sacred Lands File (SLF) by the Native American Heritage Commission (NAHC), outreach efforts with nine Native American tribal representatives, and an intensive-level pedestrian survey of the Project Area.

A search of the CHRIS records search identified 56 prior cultural resources investigations within a 1-mile radius of the Project Area. None of these studies intersects the Project Site area. A total of 167 previously recorded cultural resources were identified within a 1-mile radius of the Project Site area; however, none of these was documented directly within the Project Site area. The SLF search was negative for previously known tribal cultural resources or sacred lands within the Project Site area or within 1-mile of the Project Site area. A cultural site visit of the Project Site area was conducted on November 21, 2022. During the survey, it was determined the area is highly developed and five historic-age structures were present. No archaeological resources were observed. Archaeological materials may include prehistoric resources such as flaked and ground stone tools and debris, shell, bone, ceramics, and fire-affected rock as well as historical resources such as glass, metal, wood, brick, or structural remnants

To reduce potential impacts to less than significant, prior to the start of construction, a cultural resources management plan (CRMP) should be prepared and implemented. The Project's CRMP would include MM-CUL-1 and regulatory compliance measure RCM-1. MM-CUl-1 requires the training of construction personnel regarding the recognition of cultural resources and protection of all cultural resources. This training would take place before the initiation of ground-disturbing activities.

Per PRC Section 21083.2(f), a lead agency may make provisions for archaeological sites accidently discovered during construction. The Project Applicant would be required to comply with the City's standard condition of approval related to inadvertent discovery of unknown archaeological resources (RCM-CR-1). In the event that any subsurface cultural resources are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately. The applicant shall notify the City and consult with a qualified archaeologist who shall evaluate the find in accordance with federal, state, and local guidelines, including those set forth in PRC Section 21083.2, and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

With the Project's incorporation of MM-CUL-1 and RCM-CR-1 set forth below, the Project would result in less than significant impacts to archaeological resources.

Mitigation Measure

MM-CUL-1: All construction personnel shall be trained regarding the recognition of cultural resources and protection of all cultural resources. This training shall take place before the initiation of ground-disturbing activities. Training shall inform all construction personnel of the procedures to be followed upon the discovery of cultural resources, general cultural items, including the prehistoric and historic use of the area, as well as pictures of typical cultural resources that can be found during construction. This training should stress applicable state, federal, and local laws, and include information on what to do in case an unanticipated discovery is made by a worker. All construction personnel should be instructed to stop work within a 100-foot radius of the find and immediately inform their field supervisor upon any discovery in the Project Area.

Regulatory Compliance Measure

RCM-CR-1: In the event that any subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5. At which time the applicant shall notify the City and consult with a qualified archaeologist who shall evaluate the find in accordance with Federal, State, and local guidelines, including those set forth in the California Public Resources Code Section to PRC Section 21083.2 and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Less than Significant Impact. The Project Site is developed with existing buildings and a surface parking. Although the Project Site has been subject to grading and development in the past, future construction may disturb human remains, including those interred outside of dedicated cemeteries. If human remains are exposed during construction, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made the necessary findings as to origin and disposition, pursuant to PRC Section 5097.98. If the county coroner concludes that the remains are of Native American descent, NAHC must be notified within 24 hours, and NAHC guidelines would be adhered to in the treatment and handling of the remains (RCM-CR-2). With regulatory compliance, the Project's potential impacts would be less than significant.

Regulatory Compliance Measure

RCM-CR-2 In the event that human skeletal remains are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event human skeletal remains are discovered during construction or during any ground disturbance actives, the following procedures shall be followed:

- Stop immediately and contact the County Coroner:

  1104 N. Mission Road
  Los Angeles, CA 90033
  323) 343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
  (323) 343-0714 (After Hours, Saturday, Sunday, and Holidays)

- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.

- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

Cumulative Impacts

Cumulative impacts to historical resources must also consider changes within the same historic district. However, the Project Site is not located within the boundaries of a historic district. Additionally, cumulative impacts to historical resources must consider whether a project substantially diminishes the number or significance of historical resources of the same property type, even if they are not otherwise on the related projects list. As discussed above, the Project would have no direct or indirect impacts on historical resources on the Project Site or in the study area.

While the Project would introduce a new visual element to the study area, it would not affect the setting of any of the identified historical resources. The overall integrity of setting of the study area has already been changed by demolition and new construction. The Project would not result in a substantial adverse change to the immediate surroundings of these historical resources to the degree that they would no longer be eligible for listing under national, state, or local landmark programs. None of the historical resources in the study area would be materially impaired as a result of the Project and cumulative impacts would be less than significant.

The Project is required to implement mitigation measure MM CUL-1 and RCM-CR-1 and with that incorporation, impacts would be less than significant. Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable, and the Project, considered together with the related projects, would not result in a cumulative significant impact on archeological resources. The cumulative impact on archeological resources would be less than significant.

The Project would incorporate RCM-CR-2 and with regulatory compliance, the Project's potential impacts on human remains would be less than significant and would not result in a cumulative significant impact. Furthermore, in association with CEQA review, and depending on the depth of excavation and sensitivity of respective sites, mitigation measures and/or compliance with regulatory measures for the protection of human remains would be identified and implemented for those related projects that have the potential to cause significant impacts to undiscovered archaeological resources or to disturb human remains.

4.6 ENERGY

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

The following discussion regarding Energy is based, in part, on the technical report prepared for the Project, entitled *Utility Infrastructure Technical Report: Energy* prepared by KPFF, December 2022, contained in Appendix K and energy calculation worksheets prepared by Kimley-Horn, December 2022, contained in Appendix D.

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. The Project would redevelop the Project Site by replacing the existing parking lot and surrounding metal fence currently on site with a three-story 45-foot-tall creative office building with a three-level subterranean garage at 1139-1149 N. Las Palmas Avenue. The Project would also renovate the existing building at 1155 N. Las Palmas Avenue, change its existing use to office, and construct an approximately 695 square-foot retail and office addition on the ground floor. The Project would retain the four existing buildings located at 1128 to 1146 N. Las Palmas Avenue with minor interior renovations, but no exterior renovations, change in use, or expansion of these buildings proposed at this time. For the purpose of this Energy section, modelling assumptions used a larger Project square footage of 81,906. As such, the Energy section's conclusions are more conservative than Plan Set dated March 2022, which indicated the Project square footage to be 81,682.

The Project is required to comply with California's Energy Efficiency Standards established in Title 24, Part 6, of the California Code of Regulations (CCR). These standards were first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated by the California Energy Commission on an approximately three-year cycle to allow consideration and possible incorporation of new energy efficiency technologies and methods.

Part 11 of the Title 24 Building Standards Code is referred to as the CALGreen Code. The purpose of the CALGreen Code is to improve public health, safety and the general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) planning and design; (2) energy efficiency; (3) water efficiency and conservation; (4) material conservation and resource efficiency; and (5) environmental quality. The CALGreen Code

establishes mandatory measures for new residential and non-residential buildings, which include requirements for energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality.

The Project would comply with the applicable Energy Efficiency Standards provisions (Part 6) of Title 24 and the CALGreen Code (Part 11) and would install energy- and water- efficient appliances. The Project would comply with the current standards at the time of permit approval by the City. Those standards would be no less stringent than the 2019 Building Energy Efficiency Standards, which improved upon the 2016 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The 2019 Building Energy Efficiency Standards went into effect January 1, 2020.[43]

Construction

Energy use associated with construction of the Project would include diesel fuel consumption by on-road trucks (hauling, material delivery, and vendor trips) and off-road construction equipment, gasoline consumption by on-road worker vehicles (construction worker commute trips), and propane consumption by one construction forklift. Construction of the Project would require the export of asphalt, soil and other material, and building debris from the Project Site during the demolition and site clearing phases as well as the delivery of building materials during the building phase.

Electricity would be required to power the on-site construction trailer(s), perimeter lighting, etc., but is expected to be minimal compared to available supplies. Due to the portable, temporary nature of the trailers and lighting, they are not subject to the same codes and standards as permanent buildings and infrastructure. Nonetheless, lights and trailers would be used only as needed and be sized appropriately. Construction would not involve the on-site combustion of natural gas. Because electricity would be used only minimally and natural gas not at all, no additional analyses are required to determine that the consumption of electricity and natural gas during construction would not be wasteful, inefficient, or unnecessary.

The estimated total gasoline and diesel fuel anticipated to be used during construction is summarized below **in Table 12**: *Summary of Estimated Energy Use During Project Construction*, and in Appendix D, Energy Consumption Worksheets Project.[44]

Table 12: Summary of Estimated Energy Use During Project Construction

Energy Type	Project Annual Energy Consumption	Los Angeles County Annual Energy Consumption[1]	Percentage of Countywide Consumption
Automotive Fuel Consumption[2,3,4]			
Diesel	72,919 gallons	553,890,415 gallons	0.0132%
Gasoline	8,410 gallons	3,514,203,312 gallons	0.0002%
Propane	2,481 gallons	588,780,000 [5]	0.0004%
Notes:			

[43] https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency. Accessed September 7, 2022.

[44] See Energy Consumption Worksheets Included as Appendix D

1. The Project's estimated increases in automotive fuel consumption are compared with the countywide fuel consumption (projected) in 2024. 2. Countywide fuel consumption data is obtained from the California Air Resources Board EMFAC2021 model. 3. Construction fuel consumption is based on equipment and load factors from California Emissions Estimator Model (CalEEMod version 2020.4.0). 4. The estimated construction fuel consumption is based on the Project's construction equipment list timing/phasing, and hours of duration for construction equipment, as well as vendor, hauling, and construction worker trips. 5. Propane consumption reported for the State of California for the year 2018. Source: Argonne National Laboratory, *Source of Propane Consumed in California*, September 2020.
Refer to Appendix D Energy Data for assumptions used in this analysis.

During this construction phase, the Project would comply with regulatory compliance measures intended to conserve energy. These measures would include restricting haul truck trips to off-peak hours, not allowing engines to idle in excess of 5 minutes when not in use (CARB Air Toxics Control Measure), and using fuel that meets specified fuel and fuel additive requirements and emission standards (CCR Title 13, Sec. 2485). These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Due to increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction.

As indicated in **Table 12**, the overall diesel fuel consumption during construction of the Project would be 72,919 gallons and gasoline consumption would be 8,410 gallons, which would constitute nominal amounts (0.0132 percent and 0.0002 percent, respectively) of fuel use in the County. The use of one propane forklift would consume approximately 2,481 gallons of propane during construction, which would constitute approximately 0.0004 percent of propane consumption in the State. As such, Project construction would have a minimal effect on the local and regional energy supplies. It is noted that construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual Project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or State. Therefore, construction fuel consumption would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature. A less than significant impact would occur in this regard.

Operations

Electricity

Once the Project is operational, it would create electricity demand from a variety of sources including the commercial and retail uses on the Project Site, and related off-site water treatment and distribution. Electricity transmission for the Project Site is provided by the Los Angeles Department of Water and Power (LADWP), which serves approximately 3.8 million people in the City and is the nation's largest municipal electric utility.[45] In order to properly assesses and meet growing energy demands, the LADWP releases Integrated Resource Plans. The latest, the 2017 Final Power Strategic Long-Term Resource Plan, is a comprehensive 20-year roadmap intended to assist LADWP to meet the growing energy demand from

[45] Los Angeles Department of Water & Power (LADWP) (2017), Power Strategic Long-Term Resource Plan. Available at https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=10n2b06q5l_4&_afrLoop=192514895907060. Accessed September 7, 2022.

consumers in an environmentally responsible and cost effective manner.[46,47] LADWP reports that it has a net dependable generation capacity greater than 7,531 megawatts (MW).[48] LADWP is fully resourced to meet peak demand, but maintains transmission and wholesale marketing operations to keep production costs low and increase system reliability.[49] The LADWP December 2017 forecast reports that its total energy sales in the 2024-2025 fiscal year, when the Project would begin operation, are projected to be 23,268 gigawatt-hours (GWh).[50]

As shown below in **Table 13:** *Summary of Estimated Energy Consumption During Project Operation*, the estimated annual Project-related increase in the consumption of electricity would be approximately 2,132,032 kilowatt-hours (kWh). Existing electricity use associated with the 5,498 square feet of manufacturing use to be converted to office and retail space has been calculated and subtracted from the Project's estimated increase in electricity consumption. When compared to the LADWP's projected sales in 2024 of 23,268 GWh per year, the Project's estimated electricity demand would represent approximately 0.003 percent of total demand. This amount is negligible and is within the anticipated service capabilities of LADWP. Further, as discussed above, the Project would be required to comply with energy conservation standards contained in Title 24 of the California Code of Regulations. The Project would also be required to comply with the L.A. Green Building Code), which incorporates by reference the CALGreen Code. The L.A. Green Building Code, effective January 1, 2020, requires the use of numerous energy conservation measures beyond those required by Title 24 of the California Code of Regulations. Estimated energy consumption does not take into account reductions provided by adherence to the L.A. Green Building Code.

The L.A. Green Building Code contains both mandatory and voluntary green building measures that require energy conservation features that would reduce the Project's electricity demand. Specifically, the Project would include energy efficient lighting fixtures, Energy Star®-rated appliances, low-flow water features, and energy efficient mechanical heating and ventilation systems. In addition, the Project would provide 85 Electric Vehicle Ready Parking Spaces, including 64 Electric Vehicle Charging Stations. Therefore, with regulatory compliance and incorporation of energy conservation features that would reduce the Project's electricity demand from that estimated herein, Project operation would not result in the wasteful, inefficient, or unnecessary consumption of electricity and no mitigation measures are required.

[46] Ibid

[47] The LADWP 2022 Power Strategic Long-Term Resource Plan is currently (as of 10/19/2022) being finalized which has a 25-year horizon that aligns with state goals for greenhouse gas (GHG) emissions reductions. LADWP continues to produce an Integrated Resource Plan that is submitted to the California Energy Commission every five years.

[48] Ibid

[49] Ibid, pg. 17

[50] Ibid., Appendix A, pg. A-6

Table 13: Summary of Estimated Energy Consumption During Project Operation

Energy Type	Annual Quantity[1]	Los Angeles County Annual Energy Consumption[2]	Percentage of Countywide Consumption
Operational Electricity			
Electricity (On-Site)[3]	1,884,725 kWh	-	-
Electricity (Off-Site)[4]	307,015 kWh	-	-
Existing Electricity to be Removed	(-) 59,708 kWh	-	-
Net Electricity (Total)[5]	2,132,032 kWh	65,649,878,013 kWh[6]	0.0032%
Net Automotive Fuel Consumption[8]			
Gasoline (mobile sources)	133,333 gallons	3,514,203,312 gallons	0.0038%
Diesel (mobile sources)	733 gallons	553,890,415 gallons	0.0001%

1. Electricity value provided represent most conservative energy consumption estimates. The Project would not include natural gas usage.
2. Countywide fuel consumption is from the California Air Resources Board EMFAC2021 model.
3. Zero Emissions Vehicles, specifically as electric vehicles, will have a non-negligible energy use. That value is included in CalEEMod under the operational electricity use.
4. Off-site electricity use is dominated by water usage and includes the energy associated with the supply, treatment, distribution, and wastewater.
5. The Project increase in electricity consumption is compared to the total consumption in Los Angeles County in 2020.
6. Using LADWP's projected sales in 2024.
7. The Project increases in electricity consumption is compared with the total consumption in Los Angeles County in 2020.

kWh = kilowatt-hours

Source: **Appendix D** Energy Data for assumptions used in this analysis.

Transportation-Related Fuels

Operation of the Project would generate vehicle trips associated with people driving to and from the commercial and retail uses at the Project Site. Based on the trip generation rates provided in the Project Transportation Assessment and found in California Emissions Estimator Model (CalEEMod) outputs (Appendix J), it is estimated that operation of the Project would result in approximately 3,053,647 vehicle miles traveled (VMT) on an annual basis. Zero Emission Vehicles (ZEVs) would constitute 2.1% of VMT for all passenger vehicles.[51] It is estimated that the non-ZEV VMT (97.9% of total VMT) would result in the annual consumption of approximately 133,333 gallons of gasoline fuel and 733 gallons of diesel for Project operations.[52] As shown in **Table 13**, above, transportation fuel usage during Project operations would represent approximately 0.0036 percent of gasoline usage and 0.0001 percent of diesel usage within Los Angeles County.

The Project would include conservation measures and design features that would decrease its VMT and therefore its consumption of petroleum-based fuels (gasoline and diesel). Furthermore, the Project would be consistent with the vehicle miles travelled (VMT) reduction policies included in SCAG's 2020–2045

[51] California Emissions Factor Model (EMFAC), Los Angeles County On Road Emissions Inventory for 2024, Accessed at: https://arb.ca.gov/emfac/

[52] See **Appendix D** for detailed calculations.

RTP/SCS. Specifically, consistent with the 2020–2045 RTP/SCS alignment of transportation, land use, and housing strategies, the Project would encourage alternative modes of transit by providing employees with bicycle parking spaces and amenities and employees and visitors with convenient access to public transit, which would facilitate a reduction in VMT. The Project is an office and retail development located in a transit priority area, that increases density in an infill location located close to jobs, residential, government and service uses. In addition, the Project would provide 85 Electric Vehicle-Ready Parking Spaces including 64 Electric Vehicle Charging Stations. The Project would provide the bicycle parking pursuant to the LAMC, including up to 26 bicycle parking spaces within the one level of subterranean parking and the ground level parking. As an infill development, the Project would replace the existing empty parking lot at the Project Site with a more efficient 45-foot-tall mixed-use-development. Because of the Project Site's location near transit service, a number of Project-related trips would be expected to be transit or walking/bicycle trips, rather than vehicle trips. Some employees would take transit to their destinations or would walk to commercial uses and other services nearby. The expected reduction in Project-related vehicle trips would decrease the Project's consumption of petroleum-based fuels. As such, Project operation would not result in wasteful, inefficient, or unnecessary consumption of petroleum-based fuels, but would promote walking, biking, and other modes of public transportation, and mitigation measures are not required.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. Based on the analysis provided below, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. All of the Project's electricity demands would be served by LADWP. Additionally, the Project would comply with the 2019 California Title 24 energy standards, the 2019 CALGreen Code, the City of Los Angeles Green Building Code, City of LA Green New Deal and the 2020–2045 RTP/SCS, which contain conservation policies that are mandatory under the City's Building Code; as such, the Project would not conflict with applicable plans for renewable energy or energy efficiency. Such requirements of Title 24, CALGreen and Green Building Code include specific lighting requirements to conserve energy, window glazing to reflect heat, enhanced insulation to reduce heating and ventilation energy usage, and enhanced air filtration. The Project would incorporate these measures as required by code. The 2019 Title 24 Standards ensure that builders use the most energy efficient and energy conserving technologies and construction practices.

As discussed above, Title 24 of the California Code of Regulations contains energy efficiency standards for residential and non-residential buildings based on a state mandate to reduce California's energy demand. Specifically, Title 24 addresses a number of energy efficiency measures that impact energy used for lighting, water heating, heating, and air conditioning, including the energy impact of the building envelope such as windows, doors, skylights, wall/floor/ceiling assemblies, attics, and roofs.

Part 6 of Title 24 specifically establishes energy efficiency standards for residential and nonresidential buildings constructed in the State of California in order to reduce energy demand and consumption. The Project would comply with Title 24, Part 6 per state regulations. In accordance with Title 24, Part 6, the Project would have: (a) sensor-based lighting controls—for fixtures located near windows, the lighting would be adjusted by taking advantage of available natural light; and (b) efficient process equipment—improved technology offers significant savings.

Title 24, Part 11, contains voluntary and mandatory energy efficiency measures that are applicable to the Project under the California Green Building Standards Code. As discussed above, the Project would result in an increased demand for electricity, and petroleum-based fuels. In accordance with the Project's Title 24, Part 11 mandatory compliance, the Project would (a) divert 50% of its construction and demolition waste from landfills; (b) schedule mandatory inspections of its energy systems to ensure optimal working efficiency; (c) use only low pollutant-emitting exterior and interior finish materials, such as paints, carpets, vinyl flooring and particle boards; and (d) include features ensuring a 20% reduction in indoor water use. In addition, new Project buildings will not consume natural gas. Existing buildings would continue to operate as they do under existing conditions, and no increase in energy consumption would be anticipated. Compliance with all of these mandatory measures would decrease the Project's consumption of electricity and petroleum-based fuels.

The Project would not conflict with any of the federal, state, or local plans for renewable energy and energy efficiency. Because the Project would comply with Parts 6 and 11 of Title 24, no conflict with existing energy standards and regulations would occur.

Overall, the Project would be designed and constructed in accordance with applicable state and local green building standards that would serve to reduce the energy demand of the Project. In addition, as discussed above, the demand for electricity during construction and operation of the Project would represent a small fraction of LADWP's projected and planned sales. Similarly, as discussed above, petroleum-based fuels during construction and operations would also represent a fraction of the 2024 projected fuel use in Los Angeles County.

Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant, and no mitigation measures are required.

Cumulative Impacts

Electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. As described in LADWP's 2017 Power Strategic Long-Term Resource Plan, LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. LADWP has indicated that the Power Strategic Long-Term Resource Plan incorporates the estimated electricity requirement for the Project. The Power Strategic Long-Term Resource Plan considers future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. Development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Each of the related projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. Related project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the Project area. As such, the Project's contribution to cumulative impacts with respect to electricity infrastructure would not be cumulatively considerable and, thus, would be less than significant.

4.7 GEOLOGY AND SOILS

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

The following analysis of the Project's potential geology and soils impacts is based, in part, on the *Geotechnical Investigation Report* (Geotechnical Report) prepared for the Project by Feffer Geological Consulting, Inc., dated December 2021.[53] The Geotechnical Report received a Soils Report Approval Letter from the Los Angles Grading Division of the Department of Building and Safety on dated July 12, 2022. The Geotechnical Report and Soils Approval Letter is included as Appendix E and its findings, conclusions, and recommendations are incorporated by reference herein. The following discussion regarding Paleontological Resources is based on the technical report prepared for the Project, entitled *Paleontological Resources Assessment: 1151 N. Las Palmas Avenue* Project, prepared by Material Culture Consulting Inc., December 2022 and included in Appendix C.

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.

Less Than Significant. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey, faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults are those that have ruptured in the last 130,000 years. Inactive faults are those that have not shown evidence of surface displacement within the last 1.6 million years. In addition, there are buried thrust faults, commonly referred to as blind thrust faults, which are faults that are not exposed at the ground surface. While blind thrust faults do not present a potential surface fault rupture hazard, these deep thrust faults are considered active features capable of generating future earthquakes that could result in moderate to significant ground shaking.

The California Geological Survey establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones).[54] These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

As described in the Geotechnical Report, the Project Site is not located within a designated Alquist-Priolo Earthquake Fault Zone or within a Preliminary Fault Rupture Zone.[55] There are several Alquist-Priolo Earthquake Fault Zones in the Los Angeles region; the nearest Alquist-Priolo Earthquake Fault Zone to the

[53] Feffer Geological Consulting, Inc., Geotechnical Investigation Report, Proposed Three Story Building Over Three Subterranean Levels, 1139-1155 N. Las Palmas Avenue and 1138-1150 N. McCadden Place, Los Angeles, California, 90038, December 21, 2021.

[54] The Alquist-Priolo Earthquake Fault Zoning Act and its regulations are presented in California Department of Conservation, California Geological Survey, Special Publication 42, Earthquake Fault Zones.

[55] City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org.

Project Site is associated with the Hollywood Fault, located approximately 0.75-mile north of the Project Site.[56] There are no active faults delineated by the California Geological Survey that have been recognized as crossing or projecting toward the Project Site, and the potential for surface rupture at the Project Site is considered low. The Project would not contain uses or activities, such as mining operations or deep excavation into the earth, that would exacerbate the activity of a known earthquake fault.

As such, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death, related to rupture of a known earthquake fault. Impacts are less than significant, and no mitigation measures are required.

ii) Strong seismic ground shaking?

Less than Significant Impact. A significant impact would occur if the Project would exacerbate the risk of personal injury or death or property damage as a result of seismic ground shaking. The entire Southern California region is susceptible to strong ground shaking from severe earthquakes. Strong ground motion occurs as energy is released during an earthquake. The intensity of ground motion is dependent upon the distance to the fault rupture, the earthquake magnitude, and the geologic conditions underlying and surrounding the Project Site.

The Los Angeles Basin, as well as most of Southern California, is located within a complex zone of faults and folds resulting from compressional forces occurring along a bend within the boundary between the Pacific and North American tectonic plates. Numerous generally east-west to northwest trending faults have formed as a result of these north-south compressional forces acting within this area. The nearest active fault with a surface trace is the Hollywood Fault, located 0.75-mile north of the Project Site. In addition, the Santa Monica Fault and the Newport-Inglewood Fault are both located within 1.5 miles of the Project Site. However, as noted above, no active faults delineated by the California Geological Survey have been recognized as crossing or projecting toward the Project Site.

In addition, potential impacts related to seismic ground shaking can be reduced to less than significant through regulatory compliance, and Project structural design. State and local code requirements ensure that buildings are designed and constructed in a manner that, although they may sustain damage during a major earthquake, their risk of collapse is substantially reduced. 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 of these safety requirements before permits can be issued for construction of the Project. Accordingly, the design and construction of the Project would comply with all applicable existing regulatory requirements, the applicable provisions of the Los Angeles Building Code relating to seismic safety, and the application of accepted and proven construction engineering practices. The Los Angeles Building Code incorporates the current seismic design provisions of the 2022 California Building Code, with City amendments, to minimize seismic impacts. The 2022 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

[56] California Department of Conservation, California Earthquake Hazards Zone Application map, https://maps.conservation.ca.gov/cgs/EQZApp/app/.

earthquake safety. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of LADBS, including the recommendations provided in a final, site-specific Geotechnical Report that would be subject to review and approval by LADBS. As discussed in the Geotechnical Report, while the Project Site is subject to strong ground shaking in the event of an earthquake, this hazard is common in Southern California and the effects of ground shaking can be addressed by proper engineering design and construction in conformance with current building codes and engineering practices. The Geotechnical Report provides site-specific seismic design parameters based on the uses proposed and soil conditions at the Project Site.

Thus, the Project would be required through regulatory compliance, including the requirements of LAMC Section 91.7006.2, to incorporate the recommendations of the Project's Geotechnical Report and with any conditions issued by LADBS per their review of the Geotechnical Report, which would account for seismic calculations from probabilistic seismic hazard modeling for the Project Site. In addition, the Project would be required to comply with the City Building Code, which incorporates, with local amendments, the latest editions of the International Building Code and California Building Code. Compliance with the City Building Code includes incorporation of the seismic standards appropriate to the Project Site and its seismic design considerations as established in the Geotechnical Report that would be reviewed and approved or revised by LADBS as part of the building permit process. The Project would be required through regulatory compliance to incorporate the recommendations of the Project's geotechnical engineer contained within the Geotechnical Report and with all of the conditions issued by LADBS as part of their required review and approval, which would account for seismic calculations from probabilistic seismic hazard modeling for the Project Site.

As such, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death, related to seismic ground shaking. Therefore, impacts would be less than significant, and no mitigation measures would be required.

iii) Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Liquefaction is a phenomenon whereby saturated, granular soils lose their inherent shear strength due to excess pore water pressure build-up, such as that generated during repeated cyclic loading from an earthquake. A low relative density and loose consistency of the granular materials, shallow ground-water table, long duration and high acceleration of seismic shaking are some of the factors favorable to cause liquefaction.

As noted in the Geotechnical Report, the Project Site is not located within an area mapped as potentially affected by earthquake-induced liquefaction or landslides. As discussed in the Geotechnical Report, groundwater was encountered during exploration at a depth of 51.5 feet below the ground surface. Historically highest groundwater in this area of Los Angeles is estimated to be 20 feet below the ground surface. Groundwater was observed for a nearby site at a depth of 23 feet.

Subsurface soil conditions beneath the Project Site consist of artificial fill (clayey sand and silty sand) up to two feet below the ground surface) and dense alluvium and fine content soil, and are therefore not susceptible to liquefaction or significant seismic settlements. Furthermore, there are no open slopes or

waterways nearby that may present the seismic ground failure of lateral spreading. Therefore, the potential for seismic induced ground failure hazards such as liquefaction, seismic settlement, and lateral spreading on-site is considered low.

Additionally, pursuant to LAMC Section 91.7006.2, the Geotechnical Report for the Project addressing the Project Site soils conditions and the final design of the development would be reviewed and approved by LADBS as part of the City's ministerial process for issuing grading and building permits. Review and approval of the Geotechnical Report and design considerations by LADBS would ensure that development of the Project Site would occur in compliance with building safety requirements, including the California Building Code and the LAMC. As such, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death, related to seismic-related ground failure, including liquefaction. Therefore, impacts would be less than significant, and no mitigation measures would be required.

iv) Landslides?

No Impact. Landslide potential is generally the greatest for areas with steep and/or high slopes, low sheer strength, and increased water pressure. The area proposed for the new Building A has been previously graded and no steep slopes exist proximate to the development location and the Project does not propose substantial alterations to the existing topography that would directly or indirectly cause landslides.

As noted in the Geotechnical Report, the Project Site is not located within areas designated by the California Geological Survey where previous occurrence of landslide movement or local topographic, geological, geotechnical, and subsurface conditions indicate a potential for permanent ground displacement to the event that mitigation would be required. The Project would not contain uses or activities that would exacerbate existing environmental conditions.

As such, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death, related to landslides. No impact would occur, and no mitigation is required.

b) Result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. Project construction would involve ground-disturbing activities (e.g., excavation, grading, and foundation construction) that would expose soils for a limited time and allow for possible erosion. However, the potential for erosion would be reduced by implementation of required regulatory erosion controls imposed during Project Site preparation and grading activities. Specifically, all grading activities would require grading permits from the LADBS, which would include requirements and standards designed to limit potential impacts associated with erosion. In addition, on-site grading and Project Site preparation would be required to comply with all applicable provisions of Chapter IX, Article 1, Division 70 of the LAMC, which address grading, excavations, and fills. This LAMC division requires that all grading activities occur in accordance with grading permits issued by LADBS. The permits typically require that excavation and grading activities be scheduled during dry weather periods. Should grading activities occur during the rainy season (October 1 to April 14), a Wet Weather Erosion Control Plan must be prepared pursuant to the "Manual and Guideline for Temporary and Emergency Erosion Control," adopted by the Los Angeles Board of Public Works. The Wet Weather Erosion Control

Plan would include measures such as diversion dikes to channel runoff around the Project Site. Division 70 also requires that stockpiles, excavated, and exposed soil be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer. A deputy grading inspector is required to be on-site during grading operations to ensure adherence to applicable regulations.

Following the completion of construction, the potential for erosion would be relatively low since the Project Site would be largely impervious and the Project would be required to comply with the City's Low Impact Development (LID) Ordinance (Ordinance No. 183,833) and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. These LID BMPs would include a stormwater treatment system will consist of an underground rainwater harvesting cistern which will capture the stormwater runoff for on-site irrigation. On-site runoff that exceeds the required stormwater treatment volume will be pumped to a sump pump outlet control structure from the rain harvesting cistern and discharge to the curb face via a curb drain.

The use of hardscape and landscape plantings would act as an effective barrier to soil erosion by impeding direct contact between precipitation/irrigation and on-site soils.

With compliance with applicable regulations, impacts regarding wind or waterborne erosion during construction and operation of the Project would be less than significant. Therefore, the Project would not directly or indirectly cause potential substantial impacts related to soil erosion or the loss of topsoil. Impacts would be less than significant, and no mitigation is required.

c) 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?

Less than Significant Impact. As detailed above, the Project would not result in loss, injury, or death related to landslide or liquefaction. Because lateral spreading is the lateral movement of soils that have undergone liquefaction, the Project would, accordingly, not result in lateral spreading.

The topography of the Project Site is flat, and the Project Site is not located within a City of Los Angeles Hillside Grading Area or a Hillside Ordinance Area.[57] Subsidence and ground collapse generally occur in areas with active groundwater withdrawal or petroleum production. The extraction of groundwater or petroleum from sedimentary source rocks can cause the permanent collapse of the pore space previously occupied by the removed fluid. The Project Site is not identified as being located in an oil field or within an oil drilling area,[58] and the Project itself does not propose direct withdrawal or injection of fluid into the subsurface soils beneath the Project Site. According to testing of the site soils, the soils should be expected to be only slightly corrosive to ferrous metals, and per the recommendations of the Geotechnical Report, a consulting corrosion engineer would be retained to determine the most appropriate protection measures for the Project Site. As previously discussed, compliance with the City Building Code includes incorporation of the Project Site- and Project-specific design requirements for soil stability established in

[57] City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org.
[58] California, Department of Conservation, Division of Oil, Gas, and Geothermal Resources, Well Finder Interactive Web Map, available at: https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.24794/34.07564/18.

the Geotechnical Report that would be reviewed and approved by LADBS. The Project would be required through regulatory compliance to incorporate the recommendations of the Project's geotechnical engineer contained within the Geotechnical Report and with all of the conditions issued by LADBS per their review, which would account for slope stability at the Project Site. The Geotechnical Report prepared for the Project concluded that the Project Site can be developed without hazard of landslide and that development would also not result in a similar adverse impact on adjoining properties.[59]

Therefore, the Project Site is not located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in collapse. As such, the Project would not exacerbate existing conditions such as unstable geologic units or unstable soil. Therefore, impacts would be less than significant, and no mitigation measures would be required.

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?

No Impact. Expansion and contraction of volume can occur when expansive soils undergo alternating cycles of wetting (swelling) and drying (shrinking). During these cycles, the volume of the soil changes markedly, and can cause structural damage to buildings and infrastructure. The Geotechnical Report determined that the subsurface materials at the Project Site have low to medium expansion potential.[60] The Project would be required to comply with the City of Los Angeles Uniform Building Code, the Los Angeles Municipal Code, and other applicable building codes which include building foundation requirements, such as expansion joints, appropriate to Site-specific conditions, such as expansion potential, established in the Geotechnical Report that would be reviewed and approved by LADBS. The Project would be required through regulatory compliance to incorporate the recommendations of the Project's geotechnical engineer contained within the Geotechnical Report and with all of the conditions issued by LADBS (pursuant to LAMC Section 91.7006.2). As such, the Project would not risk life or property resulting from expansive soil. Therefore, no impacts would occur, and no mitigation measures would be necessary**.**

e) 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 in a developed area of the City, which is served by a wastewater collection, conveyance, and treatment system operated by the City. The Project would connect to the existing wastewater system. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impacts would occur, and no mitigation measures would be required.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant Impact with Mitigation Incorporated. The following discussion regarding Paleontological Resources is based on the technical report prepared for the Project, *Paleontological*

[59] Feffer Geological Consulting, Inc., Geotechnical Investigation Report, Proposed Three-Story Building Over Three Subterranean Levels, 1139-1155 N. Las Palmas Avenue and 1138-1150 N. McCadden Place, Los Angeles, California, 90038, December 21, 2021

[60] Feffer Geological Consulting, Inc., Geotechnical Investigation Report, Proposed Three-Story Building Over Three Subterranean Levels, 1139-1155 N. Las Palmas Avenue and 1138-1150 N. McCadden Place, Los Angeles, California, 90038, December 21, 2021

Resources Assessment: 1151 N. Las Palmas Avenue Project (Paleontological Resources Assessment) prepared by Material Culture Consulting Inc., December 2022.

Material Culture Consulting Inc. staff conducted an examination of geologic maps of the Project Site area and reviewed relevant published and unpublished geological and paleontological literature to determine which geologic units are present within the Project Site area and whether fossils have been recovered from those geologic units elsewhere in the region. On September 25, 2022, a locality search was conducted through the Natural History Museum of Los Angeles County (NHMLA) for the Project Site area. The search at NHMLA reported six significant vertebrate fossil localities from similar sediments to Late Pleistocene-age elevated and dissected alluvium (Qae) in close proximity to the Project Site area, within two miles. Fossil localities were discovered southwest of the Project Site area and produced specimens of bison, elephant, camel, horse, mammoth, rabbit, kangaroo rat, vole, pocket gopher, and turtle. Fossil localities were discovered northeast of the Project Site area during Metro Red Line construction and produced specimens of horse, mastodon, bison, and camel. Finally, a fossil locality was discovered southeast of the Project Site area and produced mastodon specimens.

Based on the results of the Paleontological Resources Assessment it was determined that the Project Site has a moderate potential to encounter paleontological resources and could have a potentially significant impact. However, with the Project's incorporation of MM-GEO-1, GEO-2, GEO-3, GEO-4, and GEO-5, set forth below, the Project would result in less than significant unforeseen impacts to paleontological resources.

Mitigation Measures

Mitigation Measure GEO-1: Full-time paleontological monitoring during ground-disturbing activities within the late Pleistocene-age elevated and dissected alluvium (Qae). A Paleontological Monitor is a paleontologist who has a minimum of a bachelor's or equivalent degree in geology or paleontology and no less than one year of experience performing paleontological monitoring and salvaging fossil materials in the relevant geologic province; or an equivalent degree in biology or pursuit of a degree in geology or paleontology and no less than two years of comparable experience

Mitigation Measure GEO-2: If a probable paleontological resource is uncovered during earthwork or construction, all work shall cease within a minimum distance of 50 feet from the find until a Qualified Paleontologist has been retained to evaluate the find in accordance with the Society of Vertebrate Paleontology's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Temporary flagging shall be installed around the find in order to avoid any disturbance from construction equipment. Any paleontological materials that are uncovered shall not be moved or collected by anyone other than a Qualified Paleontologist or his/her designated representative such as a Paleontological Monitor. If cleared by the Qualified Paleontologist, Ground Disturbance Activities may continue unimpeded on other portions of the site. The found deposit(s) shall be treated in accordance with the Society of Vertebrate Paleontology's Standard Procedures. Ground Disturbance Activities in the area where resource(s) were found may recommence once the identified resources are properly assessed and processed by the Qualified Paleontologist. A report that describes the resource and its disposition, as well as the assessment methodology, shall be prepared by the Qualified Paleontologist according to current professional standards and maintained for a minimum of five years after the

Certificate of Occupancy is issued. If appropriate, the report should also contain the Qualified Paleontologist's recommendations for the preservation, conservation, and curation of the resource at a suitable repository, such as the Natural History Museum of Los Angeles County, with which the Applicant or Owner must comply.

A Qualified Paleontologist is a paleontologist who meets the Society of Vertebrate Paleontology standards for a Principal Investigator or Project Paleontologist; has demonstrated competence in field techniques, preparation, identification, curation, and reporting and/or a graduate degree in paleontology or geology or a publication record in peer reviewed journals; at least two years professional experience with administration and project management experience; proficiency in recognizing fossils in the field and determining their significance; expertise in local geology, stratigraphy, and biostratigraphy; and experience collecting vertebrate fossils in the field."

Mitigation Measure GEO-3: Any recovered fossil remains will be prepared and identified to the lowest taxonomic level possible by knowledgeable paleontologists. Significant remains then will be transferred to a fossil repository for curation.

Mitigation Measure GEO-4: A qualified paleontologist shall prepare a report of findings made during all site grading activity with an appended itemized list of fossil specimens recovered during grading (if any).

Mitigation Measure GEO-5: Prior to the start of any ground-disturbing activities, a preconstruction meeting shall take place during which the qualified paleontologist shall provide all construction personnel with paleontological sensitivity training via a Worker Environmental Awareness Program (WEAP). This training program will provide information regarding the potential to encounter subsurficial paleontological resources during installation of Auger Pressure Grouted Displacement (AGPD) piles and the need to protect such resources. The training will inform construction personnel of the location(s) and boundaries of any areas with a high paleontological resource potential. Instruction will be provided as to the appropriate procedures and notifications to be undergone should paleontological resources be discovered during Project construction. The training will also emphasize that unauthorized collections or disturbances of protected fossils on or off the Project area are prohibited and may result in criminal penalties and fines. The qualified paleontologist or qualified paleontological monitor may attend tailgate meetings to brief the construction crew on paleontological monitoring protocols.

Cumulative Impacts

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. As analyzed under above, the Project's impacts to geology and soils would be less than significant. As with the Project, the related projects would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. Cumulative development would expose a greater number of people to seismic hazards. However, as with the Project, the related projects would be subject to local, state, and federal regulations and standards for seismic safety.

Many of the related projects would require excavation that could potentially expose or damage potential paleontological resources. Generally, however, projects with the potential for substantial excavation

would be subject to environmental review under CEQA. If the potential for significant impacts on paleontological resources were identified given a site's characteristics and development program of the cumulative projects, mitigation would be necessary. As with the Project, mitigation would include a monitoring program and treatment/curation of discovered fossils. Implementation of mitigation would reduce the potential for adverse effects on fossil resources individually and cumulatively and would preserve and maximize the potential of these resources to contribute to the body of scientific knowledge.

The Project is required to implement mitigation measure MM GEO-1 through MM GEO-5, reducing a significant Project impact on paleontological resources to a less than significant level. Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable, and the Project, considered together with the related projects, would not result in a cumulative significant impact on paleontological resources. The cumulative impact on paleontological resources would be less than significant.

4.8 GREENHOUSE GAS EMISSIONS

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

The analysis is based on the information provided in the *1151 N. Las Palmas, Air Quality and Greenhouse Gas Impact Assessment,* prepared by Kimley-Horn, December 2022 and in **Appendix A**.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact.

BACKGROUND

The "greenhouse effect" is the natural process that retains heat in the troposphere, the bottom layer of the atmosphere. Without the greenhouse effect, thermal energy would "leak" into space resulting in a much colder and inhospitable planet. With the greenhouse effect, the global average temperature is approximately 61˚F (16˚C). Greenhouse gases (GHGs) are the components of the atmosphere responsible for the greenhouse effect. The amount of heat that is retained is proportional to the concentration of GHGs in the atmosphere. As more GHGs are released into the atmosphere, GHG concentrations increase and the atmosphere retains more heat, increasing the effects of climate change. Six gases were identified by the Kyoto Protocol for emission reduction targets: carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFC), perfluorocarbons (PFC), and sulfur hexafluoride (SF_6). When accounting for GHGs, all types of GHG emissions are expressed in terms of CO_2 equivalents (CO_2e) and are typically quantified in metric tons (MT) or million metric tons (MMT).

Approximately 80 percent of the total heat stored in the atmosphere is caused by CO_2, CH_4, and N_2O. These three gases are emitted by human activities and natural sources. Each of the GHGs affects climate change at different rates and persists in the atmosphere for varying lengths of time. The relative measure of the potential for a GHG to trap heat in the atmosphere is called global warming potential (GWP).[61] The

[61] USEPA, *Greenhouses Gases, Understanding Global Warming Potentials*, https://www.epa.gov/ghgemissions/understanding-global-warming-potentials , accessed November 2022

GWP was developed to allow comparisons of the global warming impacts of different gases. Specifically, it is a measure of how much energy the emissions of one ton of a gas will absorb over a given period, relative to the emissions of one ton of CO_2. The larger the GWP, the more that a given gas warms the Earth compared to CO_2 over that period. GWPs provide a common unit of measure, which allows analysts to add up emissions estimates of different gases (e.g., to compile a national GHG inventory), and allows policymakers to compare emissions reduction opportunities across sectors and gases.

Stationary source combustion of natural gas in equipment such as water heaters, boilers, process heaters, and furnaces emit GHGs, primarily CO_2, CH_4, and N_2O. GHGs are also emitted from mobile sources such as on-road vehicles and off-road construction equipment, burning fuels such as gasoline, diesel, biodiesel, propane, or natural gas (compressed or liquefied). Indirect GHG emissions result from electric power generated elsewhere (i.e., power plants) used to operate process equipment, lighting, and utilities at a facility. Included in GHG quantification are electric power, which is used to pump the water supply (e.g., aqueducts, wells, pipelines) and disposal and decomposition of municipal waste in landfills.[62]

Regulations and Significance Criteria

Former California Governor Arnold Schwarzenegger issued Executive Order S-3-05 in June 2005, which established the following GHG emission reduction targets: (a) by 2010: Reduce GHG emissions to 2000 levels; (b) by 2020: Reduce GHG emissions to 1990 levels; and (c), by 2050: Reduce GHG emissions to 80 percent below 1990 levels.

Assembly Bill (AB) 32 Statutes of 2006, Health and Safety Code Section 38500 et seq. require that CARB determine what the Statewide GHG emissions level was in 1990 and approve a Statewide GHG emissions limit that is equivalent to that level, to be achieved by 2020. CARB has approved a 2020 emissions limit of 427 million metric tons of CO2 equivalent (MTCO2e). Additionally, Executive Order B-30-15 requires Statewide GHG emissions to be reduced by 40 percent below 1990 levels by 2030.

Executive Order B-30-15 also requires statewide GHG emissions to be reduced 40 percent below 1990 levels by 2030. SB 32, signed into law in September 2016, codifies the 2030 GHG reduction target in Executive Order B-30-15. SB 32 authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030 and to adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions. With SB 32, the California Legislature passed companion legislation AB 197, which provided an additional direction for developing an updated Scoping Plan. CARB released the second update to the Scoping Plan to reflect the 2030 target set by Executive Order B-30-15 and codified by SB 32 in November 2017.

Additionally, signed into law in September 2018, SB 100 increased California's renewable electricity portfolio from 50 to 60 percent by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045.

Due to the nature of global climate change, no single development project would be expected to have a substantial effect on global climate change. GHG emissions from the proposed Project would combine with emissions emitted across California, the United States, and the world to contribute cumulatively to

[62] California Air Resources Board, Climate Change Scoping Plan, 2008

global climate change. Addressing GHG emission impacts requires an agency to determine what constitutes a significant impact. The CEQA Guidelines specifically allow lead agencies to determine thresholds of significance that illustrate the extent of an impact and are a basis from which to apply mitigation measures. This means that each agency must determine whether a project's GHG emissions would have a "significant" impact on the environment. The guidelines direct that agencies use "careful judgment" and "make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" a project's GHG emissions (14 CRC §15064.4(a)).

Neither the State, SCAQMD, nor the City has adopted any numeric threshold for GHG emissions. The California Natural Resources Agency has also clarified that the effects of GHG emissions are cumulative impacts, and that they should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see Section 15064(h)(3)).[63] Further, the Governor's Office of Planning and Research's (OPR) technical advisory on CEQA and climate change, the Natural Resources Agency's Final Statement of Reasons, and CEQA Guidelines Section 15064.4 provide that a qualitative analysis of project-level impacts to determine whether a project's GHG impacts are significant can be based on a project's consistency with previously approved plans and mitigation programs, as long as such plans have adequately analyzed and mitigated GHG emissions to a less than significant level.[64] For the Project, Project consistency with applicable GHG reduction measures/plans is used as the significance threshold.

Therefore, the quantification of the Project's GHG emissions is being done for informational purposes, only, and Project GHG emissions are not evaluated against any numeric threshold; instead, Project GHG emissions are considered consistent with CEQA Guidelines Section 15064.4(b) in the context of whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For this Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the 2020–2045 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers consistency with regulations or requirements set forth by AB 32's 2008 Climate Change Scoping Plan and subsequent updates, the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the City of Los Angeles Sustainable City Plan/Green New Deal.[65]

Finally, the Project's operational GHG emissions inventory is assessed based on the incremental increase in emissions compared to baseline (existing) conditions. Therefore, the calculation of the Project's operational GHG emissions would subtract the existing emissions of the current use to determine the incremental increase. A specific discussion regarding potential GHG emissions associated with the construction and operational phases of the Project is provided below.

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[63] See generally California Natural Resources Agency, Final Statement of Reasons for Regulatory Action, December 2009, pp. 11–13, 14, 16; see also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources, April 13, 2009, www.opr.ca.gov/docs/Transmittal_Letter.pdf, accessed May 1, 2017.

[64] Governor's Office of Planning and Research, Technical Advisory—CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, 2008; California Natural Resources Agency, Final Statement of Reasons for Regulatory Action, December 2009, p. 22–26.

[65] See Appendix A2, Greenhouse Gas Assessment for detailed discussion of the regulatory framework with regards to GHG emissions.

The Project would create direct and indirect GHG emissions from Project construction and operations. Construction is considered a direct source since these emissions occur at the Project Site. Direct operational-related GHG emissions of the proposed Project would include emissions from area and mobile sources, while indirect emissions would include those related to energy consumption, water demand, and solid waste.

Construction GHG Emissions

Construction of the Project would result in direct emissions of CO_2, N_2O, and CH_4 related to the operation of construction equipment, and the transport of materials and construction workers to and from the Project Site. The SCAQMD advises that construction GHG emissions be summed and amortized over the lifetime of a project (assumed to be 30 years), then the yearly amount be added to the operational emissions.[66] Total GHG emissions generated during all phases of construction were combined and are presented in **Table 14:** *Construction Greenhouse Gas Emissions*. The CalEEMod outputs are contained within Appendix A. As shown in **Table 14**, Project construction would result in a total of 815 $MTCO_2e$ (approximately 27 $MTCO_2e$/year when amortized over 30 years).

Table 14: Construction Greenhouse Gas Emissions

Construction	**$MTCO_2e$**
Construction GHG Emission (2023)	606
Construction GHG Emission (2024)	209
Total Construction GHG Emission	815
30-Year Amortized Construction	27
Source: CalEEMod version 2020.4.0. Refer to **Appendix A** for model data outputs.	

Operational GHG Emissions

Operational or long-term emissions would occur over the life of the proposed Project. GHG emissions would result from direct emission sources such as Project-generated vehicular traffic, on-site combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power over the life of the Project, the energy required to convey water to, and wastewater from, the Project Site, the emissions associated with solid waste generated from the Project Site, and any fugitive refrigerants from air conditioning or refrigerators. **Table 15:** *Total Project Greenhouse Gas Emissions*, summarizes the total GHG emissions (amortized construction and operations) associated with proposed Project. As shown, the Project would generate approximately 1,684 $MTCO_2e$/year. After deducting the estimated existing 75 $MTCO_2e$ generated by the existing 5,498-square-foot building at 1155 N. Las Palmas Avenue with its current use to be converted, the Project would generate a total of 1,609 $MTCO_2e$ net new GHG emissions.

[66] The project lifetime is based on the standard 30-year assumption of the South Coast Air Quality Management District (South Coast Air Quality Management District, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13,* August 26, 2009).

Table 15: Total Project Greenhouse Gas Emissions

Emissions Source	$MTCO_2e$ per Year
Construction Amortized over 30 Years	27
Area Source	0.01
Energy	497
Mobile	1,001
Waste	41
Water & Wastewater	118
Total Project Emissions[1]	**1,684**
Existing Emissions to be Removed	*75*
Total Net New Emissions	**1,609**
1. Totals may be slightly off due to rounding.	
Source: CalEEMod version 2020.4.0. Refer to **Appendix A** for model data outputs.	

Greenhouse Gas Reduction Plan Compliance

In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as AB 32, into law. AB 32 commits the State to reduce statewide GHG emission levels as follows:

- By 2010, reduce to 2000 emission levels;
- By 2020, reduce to 1990 levels; and
- By 2050, reduce to 80 percent below 1990 levels.

AB 32 requires that CARB determine what the statewide GHG emissions level was in 1990 and approve a statewide GHG emissions limit that is equivalent to that level, to be achieved by 2020. Executive Order (EO) B-30-15, which was issued in April 2015 by Governor Brown, requires statewide requires GHG emissions to be reduced 40 percent below 1990 levels by 2030. SB 32, signed into law in September 2016, codifies the 2030 GHG reduction target in EO B-30-15. Also, pursuant to AB 32, CARB must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.[67]

To achieve these goals, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide Greenhouse Gas (GHG) emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved.

The California Attorney General's Office has taken an active role in addressing climate change in CEQA documents. The Attorney General's Office has created and routinely updates a Fact Sheet listing project design features to reduce greenhouse gas emissions.[68] The Attorney General's Office created the Fact Sheet primarily for the benefit of local agencies processing CEQA documents, noting that "local agencies will help to move the State away from 'business-as-usual' and toward a low-carbon future."[69] The Fact

[67] California Air Resources Board. AB 32 Global Warming Solutions Act of 2006. ww2.arb.ca.gov/resources/fact-sheets/ab-32-global-warming-solutions-act-2006, accessed August 15, 2021.

[68] California Attorney General's Office Fact Sheet, The CEQA—Addressing Global Warming Impacts at the Local Agency Level, revised January 6, 2010.

[69] California Attorney General's Office Fact Sheet, The CEQA—Addressing Global Warming Impacts at the Local Agency Level, revised January 6, 2010, http://understandtheplan.info/wp-content/uploads/2014/08/GW_mitigation_measures.pdf.

Sheet explains that the listed "measures can be included as design features of a project," but emphasizes that they "should not be considered in isolation, but as part of a larger set of measures that, working together, will reduce greenhouse gas emissions and the effects of global warming."[70]

The Governor's Office of Planning and Research (OPR) recommended Amendments to the CEQA Guidelines for GHGs which were adopted on December 30, 2009. CEQA Guidelines Section 15064.4 was adopted to assist lead agencies in determining the significance of the impacts of GHGs. Consistent with the developing practice, this section of the CEQA Guidelines urges lead agencies to quantify GHG emissions of projects where possible, but also indicates that a that a full "life-cycle" analysis is not required. In addition to quantification, CEQA Guidelines Section 15064.4 recommends consideration of several other qualitative factors that may be used in the determination of significance (i.e., the extent to which the Project may increase or reduce GHG emissions compared to the existing environment; whether the Project exceeds an applicable significance threshold; and the extent to which the Project complies with regulations or requirements adopted to reduce or mitigate GHGs).

Lead agencies must either establish significance thresholds for their respective jurisdictions or determine significance on a case-by-case basis.[71] The lead agency should use its "careful judgment" in making a determination of significance, and should make a "good-faith" effort to "describe, calculate or estimate" the amount of GHGs that will result from a project.[72,73] The lead agency is given the discretion to select a reasonable model and methodology to quantify GHGs and to rely on a qualitative analysis or performance based standards for its determination.[74] A lead agency should also consider the following factors, among others, when assessing the significance of impacts from GHGs: (1) the extent to which the project may increase or reduce GHGs; (2) whether the GHG emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, local plan for the reduction or mitigation of GHG emissions.[75]

CEQA Guidelines Section 15064 provides that a determination that an impact is not cumulatively considerable may rest on compliance with previously adopted plans or regulations, including plans or regulations for the reduction of GHG emissions.

As discussed above, no applicable numeric significance threshold for GHG emissions has been adopted by the State, SCAQMD, or the City of Los Angeles. Although State, regional, and local plans and policies have been adopted to help address climate change (see discussions above), no current law or regulation would regulate all aspects of the Project's GHG emissions. In the absence of any adopted numeric threshold, the City has determined to assess the significance of the Project's GHG emissions as provided in CEQA Guidelines Section 15064.4(b)(2) by determining whether the Project is consistent with applicable plans,

[70] California Attorney General's Office Fact Sheet, The CEQA—Addressing Global Warming Impacts at the Local Agency Level, revised January 6, 2010, http://understandtheplan.info/wp-content/uploads/2014/08/GW_mitigation_measures.pdf.

[71] CEQA Guidelines Section 15064.7(b)

[72] CEQA Guidelines Section 15064.4(a).

[73] CEQA Guidelines Section 15064.4(a).

[74] CEQA Guidelines Section 15064.4(a)(1)-(2).

[75] CEQA Guidelines Section 15064.4(b).

policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

Therefore, under this analysis, a significant impact would occur if the Project would not comply with applicable regulatory plans and policies to reduce GHG emissions such as those discussed within CARB's Scoping Plan and subsequent updates, SCAG's 2020–2045 RTP/SCS, and the City's Green New Deal. The analysis below describes the extent to which the Project complies with or exceeds the performance-based standards included in the regulations outlined in these plans. As shown herein, the Project would be consistent with the applicable GHG reduction plans and policies.

Regional Transportation Plan/Sustainable Communities Strategy Consistency

Under SB 375, each Metropolitan Planning Organization (MPO) is required to adopt and then update a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that its region will meet a target, set by CARB, for reducing GHG emissions. The purpose of SB 375 is to implement the State's GHG emissions reduction goals by integrating land use planning with the goal of reducing car and light-duty truck travel.

Reflecting that purpose, the primary goal of SCAG's 2020–2045 RTP/SCS is to provide a framework for achieving the CARB-assigned per capita reduction targets for GHG emissions from cars and light-duty trucks through land use planning and transportation options, while taking into account anticipated future growth within the region.[76] To accomplish this target, the 2020–2045 RTP/SCS identifies various strategies for reducing per capita VMT. New GHG reduction targets are assigned by CARB, and thus, SCAG's long-range planning document is updated, every four years.

In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2020–2045 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands.[77] Thus, successful implementation of the 2020–2045 RTP/SCS would result in communities with a variety of transportation and housing choices, while reducing automobile use and, thus, GHG emissions from that use.

With regard to individual developments, such as the Project, strategies and policies set forth in the 2020–2045 RTP/SCS can be grouped into the following three categories: (1) reduction of vehicle trips and VMT; (2) increased use of alternative fuel vehicles; and (3) improved energy efficiency.[78] These strategies and policies are addressed below. Also, the Project's consistency with applicable growth forecasts is also assessed because the development of the RTP/SCS involved compilation of local land use and growth trends to form the basis for projections and strategies of the RTP/SCS.[79] Key GHG reduction strategies in SCAG's 2020–2045 RTP/SCS, which are based on changing the region's land use and travel patterns,

[76] Southern California Association of Governments, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176

[77] Ibid.

[78] Southern California Association of Governments, Draft Program EIR for the 2020–2045 RTP/SC, Section 3.8, Greenhouses, December 2019, p. 3.8-61.

[79] Southern California Association of Governments, Connect SoCal (2020–2045 RTP/SCS) page 10, adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176

include: (1) new housing and job growth focused in High Quality Transit Areas (HQTAs); (2) limit total acreage of greenfield or otherwise rural land uses converted to urban use; and (3) reduce VMT per capita.[80]

Consistency with Integrated Growth Forecast. The 2020–2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. These population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies of local jurisdictions within SCAG's jurisdiction applicable to the specific area.[81] The Project is expected to generate a net increase of 346 employees at the Project Site.[82] Growth forecasts prepared by SCAG that are published in the 2020-2045 RTP/SCS indicate that employment within the City will increase from 1,848,300 jobs in 2016 to 2,135,900 jobs in 2045, which represents an increase of 287,600 jobs.[83] Representing only 0.1 percent of this increase, the Project's net increase of 346 employees would be within and therefore be consistent with, and not conflict with, local and regional employment projections.

Consistency with VMT Reduction Strategies and Policies. According to the Transportation Assessment prepared by Kimley-Horn in December 2022, the Project is estimated to generate lower VMT per employee than the APC average designated for the Project Site area with its incorporation of trip reduction Project Design Features. Specifically, the Project incorporates Project Design Features such as commute trip reduction and education and encouragement strategies to reduce VMT; Attachment G of the LADOT TAG provides the methodology to calculate the VMT reduction.[84] Trip generation and VMT were calculated using the LADOT VMT Calculator, which also accounts for the VMT reductions achieved by Project Design Features such as increased density and proximity to transit.[85] As shown in the Transportation Assessment (**Appendix J**), incorporation of these VMT reduction Project Design Features incorporated into the Project results in a 19-percent reduction in both overall VMT per employee and resultant GHG emissions, which reductions render the Project consistent with the GHG reduction strategies provided in the 2020–2045 RTP/SCS.[86]

The Project would also be consistent with the key GHG reduction strategy in SCAG's 2020–2045 RTP/SCS to reduce VMT per capita, which is based on changing the region's land use and travel patterns, as is more fully discussed below.[87]Therefore, the Project would be consistent with, and would not conflict with, these VMT reduction strategies and policies.

80 Southern California Association of Governments 2020–2045 RTP/SCS, Table 5.1, Connect SoCal Performance Measures and Results.

81 Southern California Association of Governments, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.

82 City of Los Angeles VMT Calculator Documentation, Version 1.3, LADOT, Los Angeles Department of Transportation and Los Angeles Department of City Planning, Table 1, Land Use and Trip Generation Base Assumptions, May 2020

83 Southern California Association of Governments, Connect SoCal (2020–2045 RTP/SCS), Demographics and Growth Forecast adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579

84 City of Los Angeles, Transportation Assessment Guidelines, July 2020. https://ladot.lacity.org/sites/default/files/documents/2020-transportation-assessment-guidelines_final_2020.07.27.pdf

85 City of Los Angeles VMT Calculator Documentation, Version 1.3, LADOT, Los Angeles Department of Transportation and Los Angeles Department of City Planning, Table 1, Land Use and Trip Generation Base Assumptions, May 2020

86 Southern California Association of Governments 2020–2045 RTP/SCS, Chapter 3, adopted September 2020 https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020

87 Southern California Association of Governments 2020–2045 RTP/SCS, Table 5.1, Connect SoCal Performance Measures and Results.

Increased Use of Alternative Fueled Vehicles Policy Initiative. Another goal of the 2020–2045 RTP/SCS for individual development projects, such as the Project, is to increase alternative fueled vehicles to reduce per capita GHG emissions.[88] The 2020–2045 RTP/SCS policy initiative focuses on providing charge port infrastructure and accelerating fleet conversion to electric or other near zero-emission technologies.[89] At least 30 percent of the Project's total LAMC-required parking spaces would be capable of supporting future EVSE and at least 10 percent of its total LAMC-required parking spaces would have EV charging stations as dictated by City requirements. As such, the Project would exceed CALGreen Code requirements. Therefore, the Project would be consistent with, and would not conflict with, this goal.

Energy Efficiency Strategies and Policies. Another important goal of the 2020–2045 RTP/SCS for individual development projects, such as the Project, involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions.[90] That goal is to actively encourage and create incentives for energy efficiency, where possible.[91] As discussed above, 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 Code.[92,93] These standards would reduce energy and water usage and waste and, thereby, reduce associated GHG emissions and help minimize any impact on natural resources and infrastructure. The sustainability Project Design Features incorporated into the Project include enhanced energy-efficiency via high-performance glazing, as well as enhanced roof and deck insulation values in the new building. The air conditioning systems would be comprised of highly efficient Variable Refrigerant Flow systems allowing for minimal electrical consumption. Landscape design would comply with the requirements of the water efficiency landscape ordinance and landscape regulations of the City. Furthermore, the Project would not utilize natural gas during operations for the newbuilding. In addition, the Project would be subject to the 2022 Title 24 standards, which encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards. Therefore, the Project would be consistent with, and would not conflict with, this goal.

Land Use Assumptions. At the regional level, the 2020–2045 RTP/SCS is a plan adopted for the purpose of reducing GHG emissions from car and light-duty truck travel through better land use planning.[94] In order to assess the Project's consistency with land use assumptions in the 2020–2045 RTP/SCS, the Project's land use characteristics have been analyzed for consistency with the underlying land use assumptions on which SCAG based its SCS. The following key GHG reduction strategies in SCAG's 2020–2045 RTP/SCS are based on changing the region's land use and travel patterns:[95]

- New housing and job growth focused in High Quality Transit Areas (HQTAs);

88 SCAG, 2020–2045 RTP/SCS, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.
89 Ibid.
90 Ibid.
91 Ibid.
92 City of Los Angeles Municipal Code (LAMC), Chapter IX, Article 9.
93 California Building Standards Commission, 2019 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11, effective January 1, 2020.
94 As part of the state's mandate to reduce per-capita GHG emissions from automobiles and light trucks, the 2020–2045 RTP/SCS presents strategies and tools that are consistent with local jurisdictions' land use policies and incorporates practices to achieve the state-mandated reductions in GHG emissions at the regional level through reduced per-capita vehicle miles traveled. SCAG 2020–2045 RTP/SCS, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176 .
95 Southern California Association of Governments 2020–2045 RTP/SCS, Table 5.1, Connect SoCal Performance Measures and Results.

- Limit total acreage of greenfield or otherwise rural land uses converted to urban use; and
- Reduce VMT per capita.

Generally, projects are considered consistent with the provisions and general policies of local and regional land use plans and regulations, such as the 2020–2045 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.[96]

The Project would support, and not conflict with, the goals of the 2020–2045 RTP/SCS to maximize the productivity of the region's transportation system as well as protect the environment and health of the region's residents by reducing per capita GHG emissions from cars and light-duty trucks through its land use characteristics and through the VMT-reducing Project Design Features incorporated into the Project. The Project would develop its increased density, and therefore its job growth, on a previously developed urban infill site located in a HQTA that is in close proximity to mass transit options. These Project land use characteristics would focus its job growth in a HQTA, not in a greenfield or rural area, and would minimize the Project's vehicle miles traveled. In addition, the Project would provide bicycle parking spaces and shower facilities and lockers that would serve to promote walking and use of bicycles over travel by car or truck. As such, the Project's location and design would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation. The Project is the type of land use development that is encouraged by the 2020–2045 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State's long-term climate policies.[97] By furthering implementation of SB 375, the Project supports regional land use and transportation-related GHG reductions consistent with State regulatory requirements.

The reduction strategies stated in the 2020–2045 RTP/SCS are "consistent with local jurisdictions' land use policies and incorporate best practices for achieving the state-mandated reductions in GHG emissions at the regional level".[98] The strategies identify how the SCAG region can achieve GHG reductions and while SCAG does not have a direct role in the implementation of these strategies, SCAG works to support local jurisdictions by identifying ways to implement the RTP/SCS that fits the vision and needs of each local community.[99] A detailed consistency discussion placed in the context of the strategies as laid out in the RTP/SCS is included in **Table 16:** *Regional Transportation Plan/Sustainable Communities Strategy Consistency*. As shown in **Table 16**, many RTP/SCS strategies are not directly applicable to the proposed Project. Nonetheless, the proposed Project would not conflict with implementation of any of the strategies of the RTP/SCS. Therefore, the proposed Project would not result in any significant impacts or interfere with SCAG's ability to achieve the region's mobile source GHG reduction targets.

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96 See, e.g., *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 717-719.

97 As discussed above, SB 375 legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32.

98 Southern California Association of Governments 2020–2045 RTP/SCS Connect SoCal, page 48. Adopted September 2020. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176

99 Southern California Association of Governments 2020–2045 RTP/SCS Connect SoCal, page 49. Adopted September 2020. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176

Table 16: Regional Transportation Plan/Sustainable Communities Strategy Consistency

Reduction Strategy	Project Consistency Analysis
Focus Growth Near Destinations and Mobility Options	
• Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations. • Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets. • Plan for growth near transit investments and support implementation of first/last mile strategies. • Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses. • Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods. • Encourage design and transportation options that reduce the reliance on a number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations). • Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking).	**No Conflict.** These strategies are intended to direct local jurisdictions' actions. Nonetheless, the Project fulfills the intent of these land use policies. The Project Site is located in a HQTA and increases density in an infill location located close to jobs, residential, government, and service uses. The Project Site is located in an urban infill area within walking and biking distance to existing commercial and neighborhood-serving retail uses and transit. The Project Site is also located within close proximity to several transit options. It is approximately 0.7 miles from the Hollywood and Highland Metro Station which serves the B Line (formally the Red Line) of the Metro Rail System. Numerous bus lines also serve the Project Site, including Metro bus lines 224 and 4 and the DASH Hollywood line. The Project would also provide the required number of bicycle parking spaces and related amenities and EV parking spaces in accordance with City of Los Angeles Ordinance 186485; the Project's EV parking spaces exceed CALGreen Code requirements. The Project's focus on locating its growth near destinations and mobility options results in a less-than-significant VMT of 7.4 per employee, which demonstrates that the Project would contribute to reducing GHG emissions from the transportation sector.
Promote Diverse Housing Choices	
• Preserve and rehabilitate affordable housing and prevent displacement. • Identify funding opportunities for new workforce and affordable housing development. • Create incentives and reduce regulatory barriers for building accessory dwelling units to increase housing supply. • Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions.	**No Conflict.** The proposed Project does not include a residential component and this strategy would not be applicable.
Leverage Technology Innovations	
• Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space. • Improve access to services through technology – such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-model payments. • Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation.	**No Conflict.** These strategies are intended to direct local jurisdictions' actions. Nonetheless, the Project fulfills the intent of these policies. The Project would be required to comply with all applicable Title 24 and CALGreen building codes at the time of construction. These building codes would require EV charging stations, designated EV parking, as well as bike parking and storage. The Project would provide the required number of bicycle parking spaces and related amenities and EV parking spaces in accordance with City of Los Angeles Ordinance 186485; the Project's EV parking spaces exceed CALGreen Code requirements. Therefore, the Project would utilize technology innovations to reduce reliance on fossil fuels to help the City, County, and State meet its GHG reduction goals. The Project would be consistent with this reduction strategy.

Reduction Strategy	Project Consistency Analysis
Support Implementation of Sustainability Policies	
• Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions. • Support Statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations. • Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space. • Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies. • Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region. • Continue to support long range planning efforts by local jurisdictions. • Provide educational opportunities to local decision makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy.	**No Conflict.** These strategies are intended to direct local jurisdictions' actions. Nonetheless, the Project fulfills the intent of these policies. As previously discussed, the Project would comply with sustainable practices included in the Title 24 standards, CALGreen Code, and City ordinances such as installation of EV charging stations, bike parking and storage, and low-flow fixtures. In addition, the Project would not require the use of natural gas, supporting the phasing out of fossil fuels. Thus, the Project would be consistent with this reduction strategy.
Promote a Green Region	
• Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards. • Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration. • Integrate local food production into the regional landscape. • Promote more resource efficient development focused on conservation, recycling, and reclamation. • Preserve, enhance, and restore regional wildlife connectivity. • Reduce consumption of resource areas, including agricultural land. • Identify ways to improve access to public park space.	**No Conflict.** These strategies are intended to direct local jurisdictions' actions. Nonetheless, the Project fulfills the intent of these policies. The proposed Project consists of an office development on a previously developed infill site in an urbanized area. Development of the Project would therefore not interfere with regional wildlife connectivity or consumption of agricultural or greenfield land. The Project would be required to comply with Title 24 standards and CALGreen Code, which would help reduce energy consumption and reduce GHG emissions. In addition, the Project would be an all-electric development that would not require the use of natural gas, and would thereby support the goal of phasing out fossil fuels. The Project would provide the required number of bicycle parking spaces and related amenities and EV parking spaces in accordance with City of Los Angeles Ordinance 186485 requirements, which requirements exceed CALGreen Code requirements. The Project would include multiple pedestrian-friendly features both within the Project Site and along its perimeter, including wayfinding signage and lighting, safety lighting, and separate pedestrian entrances. Given the Project Site's location in proximity to a variety of transportation options, its abundant EV parking spaces, and its bicycle parking spaces and related amenities and pedestrian-friendly features, the Project would maximize mobility, accessibility, and overall productivity of the transportation system by encouraging and providing various opportunities for the use of alternative modes of transportation, including public transit, walking and biking. Thus, the Project would support efficient development that reduces energy consumption and GHG emissions. The Project would be consistent with this reduction strategy.

Reduction Strategy	Project Consistency Analysis
Source: Southern California Association of Governments, *Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)*, 2020.	

California Air Resource Board Scoping Plan Consistency

Appendix D, Local Actions, of the 2022 Scoping Plan Update includes "recommendations intended to build momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under the California Environmental Quality Act (CEQA)." (Page 4 of **Appendix D**.)

The State encourages local governments to adopt a CEQA-qualified CAP addressing the three priority areas (transportation electrification, VMT reduction, and building decarbonization). However, the State recognizes that almost 50 percent of jurisdictions do not have an adopted CAP, among other reasons because they are costly, requiring technical expertise, staffing, funding. Additionally, CAPs need to be monitoring and updated as State targets change, and new data is available. Jurisdictions that wish to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP are advised to look to the three priority areas when developing local climate plans, measures, policies, and actions: (transportation electrification, VMT reduction, and building decarbonization). "By prioritizing climate action in these three priority areas, local governments can address the largest sources of GHGs within their jurisdiction." (Page 9 of **Appendix D**.)

The State also recognizes in Appendix D, Local Actions, of the Scoping Plan that each community or local area has distinctive situations and local jurisdictions must balance the urgent need for housing[100] while demonstrating that a Project is in alignment with the State's Climate Goals. The State calls for the climate crisis and the housing crisis to be confronted simultaneously. Jurisdictions should avoid creating targets that are impossible to meet as a basis to determine significance. Ultimately, targets that make it more difficult to achieve statewide goals by prohibiting or complicating projects that are needed to support the State's climate goals, like infill development, low-income housing, or solar arrays, are not consistent with the State's goals. The State also recognizes the lead agencies' discretion to develop evidence-based approaches for determining whether a project would have a potentially significant impact on GHG emissions.

As discussed above, jurisdictions that want to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP should also look to the three priority areas (transportation electrification, VMT reduction, and building decarbonization). To assist local jurisdictions, the 2022 Scoping Plan Update presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas (Priority GHG Reduction Strategies for Local Government Climate Action Priority Areas).[101] A detailed assessment of goals, plans, policies implemented by the City which would support the GHG reduction strategies in the three priority areas is provided below. In addition, further details are provided regarding the correlation between these reduction strategies and

[100] The State recognizes the need for 2.5 million housing units over the next eight years, with one million being affordable units. See page 20, **Appendix D**, 2022 Scoping Plan Update, November 2022.
[101] Table 1 of **Appendix D**, 2022 Scoping Plan Update, November 2022.

applicable actions included in Table 2-1 (page 72) of the Scoping Plan (Actions for the Scoping Plan Scenario).

Transportation Electrification. The priority GHG reduction strategies for local government climate action related to transportation electrification are discussed below and would support the Scoping Plan action to have 100 percent of all new passenger vehicles to be zero-emission by 2035 (see Table 2-1 of the Scoping Plan).

- Convert local government fleets to zero-emission vehicles (ZEV)

The CARB approved the Advanced Clean Cars II rule which codifies Executive Order N-79-20 and requires 100 percent of new cars and light trucks sold in California be zero-emission vehicles by 2035. The State has also adopted AB 2127, which requires the CEC to analyze and examine charging needs to support California's EVs in 2030. This report would help decision-makers allocate resources to install new EV chargers where they are needed most.

The City of LA Green New Deal (Sustainable City Plan 2019) identifies a number of measures to reduce VMT and associated GHG emissions. Such measures that would support the local reduction strategy include converting all city fleet vehicles to zero emission where technically feasible by 2028. Starting in 2021, all vehicle procurement followed a "zero emission first" policy for City fleets. The Green New Deal also establishes a target to increase the percentage of zero emission vehicles to 25 percent by 2025, 80 percent by 2035 and 100 percent by 2050. In order to achieve this goal, the City would build 20 Fast Charging Plazas throughout the City. The City would also install 28,000 publicly available chargers by 2028 to encourage adoption of ZEVs.

The City's goals of converting the municipal fleet to zero emissions and installation of EV chargers throughout the City would be consistent with the Scoping Plan goals of transitioning to EVs. Although this measure mainly applies to City fleets, the Project would not conflict with these goals by installing EV chargers in at least 10 percent of total proposed parking spaces. Installation of additional EV chargers would encourage adoption of EVs

- Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans)

The State has adopted AB 1236 and AB 970, which require cities to adopt streamline permitting procedures for EV charging stations. As a result, the City updated Section IX of the LAMC, which requires most new construction to designate 30 percent of new parking spaces as capable of supporting future electric vehicle supply equipment (EVSE). This would exceed the CALGreen 2022 requirements of 20 percent of new parking spaces as EV capable. The ordinance also requires new construction to install EVSE at 10 percent of total parking spaces. This requirement also exceeds the CALGreen 2022 requirements of installing EVSE for 25 percent of EV capable parking spaces which is approximately five percent of total parking spaces. The City has also implemented programs to increase the amount of EV charging on city streets, EV carshare, and incentive programs for apartments to be retrofitted with EV chargers.

The City's goals of installing EV chargers throughout the City would be consistent with the Scoping Plan goals of transitioning to EVs. The Project would provide 85 Electric Vehicle Ready Parking Spaces, including 64 Electric Vehicle Charging Stations (EVCS), which complies with City of Los Angeles Ordinance 186485 requirements, which requires that 30% of the total number of parking spaces plus 10% of all nonresidential parking spaces be provided as EV charging spaces. This requirement exceeds the CALGreen

requirement of 20% of total parking spaces and the CALGreen Tier 1 voluntary measure of 30% of total parking spaces. Therefore, the Project would provide EV charging infrastructure that would support the 2022 Scoping Plan's focus on zero-emission transportation.

VMT Reduction. The priority GHG reduction strategies for local government climate action related to VMT reduction are discussed below and would support the Scoping Plan action to reduce VMT per capita 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045.

- Reduce or eliminate minimum parking standards in new developments
- Implement parking pricing or transportation demand management pricing strategies

The City of Los Angeles Mobility Plan 2035 which is the Transportation Element of the City's General Plan contains measures and programs related to VMT reduction throughout the City. With regard to parking standards, the implementation of Mobility Plan Programs and AB 2097 reduce or eliminate parking requirements for certain types of developments near transit (within half a mile). These reduction strategies and TDM programs would serve to reduce minimum parking standards and reduce vehicle trips.

Pursuant to SB 375, CARB has set regional targets to work towards achieving GHG emissions reductions from changed land use patterns and improved transportation. Each Metropolitan Planning Organization (MPO) must prepare a sustainable communities strategy (SCS) that will reduce emissions to achieve these regional targets. The 2035 target for the SCAG region is a 19 percent reduction in per capita vehicle GHG emissions relative to 2005 levels.

The Project would include Project Design Features that would reduce trips and vehicle miles traveled (VMT) through PDFs TRAF-1 through TRAF-3 and Mitigation Measure MM TRAF-1 and are included in the VMT analysis for the Project. Through PDF TRAF-1, the Project would educate and inform employees about transportation options. Vehicle parking spaces will be reduced and replaced by bicycle parking and shower/changing facilities would be provided through PDF TRAF-2 and TRAF-3, respectively. Designated parking spaces for ridesharing vehicles would be provided through implementation of MM TRAF-1. These PDFs and MM TRAF-1, as described by Los Angeles Department of Transportation's (LADOT's) Transportation Assessment Guidelines (TAG), would include promotions and marketing, rideshare program, reduced parking supply, and bike parking and amenities per LAMC. As it is assumed that 100 percent of employees would be eligible to be involved with a ridesharing program, the full 15% reduction can be taken. It is also assumed that 100 percent of employees would be eligible before participation in the promotions and marketing program, allowing for the full 4% VMT reduction. The effectiveness of the TDMs to reduce vehicle trips and VMT is based on research from the California Air Pollution Control Officers Association (CAPCOA) as described in Appendix G of the TAG.

- Implement Complete Streets policies and investments, consistent with general plan circulation element requirements.

The City of Los Angeles Mobility Plan 2035 established a "Complete Streets" planning framework which resulted in the City of Los Angeles Complete Streets Design Guide in 2015, consistent with California's Complete Streets Act of 2008. A supplemental update to the Complete Streets Design Guide was adopted in 2020.

The Complete Streets Design Guide provides a number of measures to increase public access to electric shuttles, car sharing and walking. The Design Guide establishes guidelines for establishing on-street parking for car sharing. The City has also established BlueLA which is a car sharing network consisting of

more than 100 electric vehicles located throughout the City. In addition, under the Green New Deal, the City would install 28,000 publicly available chargers by 2028 and introduce 135 new electric DASH buses.

This reduction strategy mainly applies to City traffic circulation. Vehicle parking spaces will be reduced and replaced by bicycle parking and shower/changing facilities would be provided through PDF TRAF-3 and TRAF-4, respectively. These PDFs would encourage alternative modes of transportation. Therefore, the Project would not conflict with implementation of Complete Streets policies.

- Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc.
- Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking
- Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood)
- Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert "greenfield" land to urban uses (e.g., green belts, strategic conservation easements).

These reduction strategies are supported through implementation of SB 375 which requires integration of planning processes for transportation, land-use and housing and generally encourages jobs/housing proximity, promote transit-oriented development (TOD), and encourages high-density residential/ commercial development along transit corridors. To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020–2045 RTP/SCS, also referred to as Connect SoCal. The 2020–2045 RTP/SCS' "Core Vision" prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. Please refer below for additional discussion of consistency with the 2020-2045 RTP/SCS.

On a local level, the City has developed the Complete Streets Design Guide which provides a number of reduction strategies to increase public access to electric shuttles, car sharing and walking, continues to build out networks in the Mobility Plan for pedestrians, bicyclists, and transit users, has implemented an EV car sharing network, and is working towards increasing publicly available chargers, and introducing new electric DASH buses.

The portion of the Project Site on which the new Project building would be developed is an existing surface parking lot located in an urban infill area that is within walking and biking distance to existing commercial and neighborhood-serving retail uses and transit. The Project would increase density on an underutilized infill site located close to jobs and to residential, government, and service uses. The Project Site is also located within close proximity of several transit options. The Project would also provide the required number if bicycle parking spaces and related amenities and EV parking spaces in accordance with City of Los Angeles Ordinance 186485; as noted above, the Project's EV parking spaces exceed CALGreen Code requirements. The Project also includes multiple pedestrian-friendly features both within the Project Site and along its perimeter, including wayfinding signage and lighting, safety lighting, and separate pedestrian entrances. The Project's focus on locating its growth near destinations and mobility options results in a less-than-significant VMT of 7.4 per employee, which demonstrates that the Project would contribute to reducing GHG emissions from the transportation sector. The Project would comply with sustainable

practices included in the Title 24 standards, CALGreen Code, and City ordinances such as installation of EV charging stations, bike parking and storage, and low-flow fixtures. In addition, the Project would be an all-electric development that would not require the use of natural gas, and would thereby support the goal of phasing out fossil fuels.

Building Decarbonization. The priority GHG reduction strategies for local government climate action related to electrification are discussed below and would support the Scoping Plan actions regarding meeting increased demand for electrification without new fossil gas-fire resources and all electric appliances beginning in 2026 (residential) and 2029 (commercial) (see Table 2-1 of the Scoping Plan).

- Adopt all-electric new construction reach codes for residential and commercial uses

California's transition away from fossil fuel–based energy sources will bring the project's GHG emissions associated with building energy use down to zero as our electric supply becomes 100 percent carbon free. California has committed to achieving this goal by 2045 through SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 strengthened the State's Renewables Portfolio Standard (RPS) by requiring that 60 percent of all electricity provided to retail users in California come from renewable sources by 2030 and that 100 percent come from carbon-free sources by 2045. The land use sector will benefit from RPS because the electricity used in buildings will be increasingly carbon-free, but implementation does not depend (directly, at least) on how buildings are designed and built.

The City has updated the LAMC with requirements for all new buildings, with some exceptions to be all-elective, which will reduce GHG emissions related to natural gas combustion. Space heating, water heating and cooking for non-restaurant uses would be required to be powered by electricity. In future years, the LADWP will be required to increase the amount of renewable energy in the power mix to comply with SB 100 requirements. The combination of the all-electric LAMC regulations and increasing availability of renewable energy will serve to reduce GHG emissions from sources traditionally powered by natural gas.

The Project would be required to comply with the City's LAMC and proposed new buildings would not include natural gas uses. Therefore, the Project would be consistent and not conflict with the LAMC.

- Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers)

This reduction strategy would support the Scoping Plan action regarding electrification of appliances in existing residential buildings (see Table 2-1 of the Scoping Plan). The City and Los Angeles Department of Water and Power has established rebate programs to promote use of energy-efficient products and home upgrades. Under the LADWP's Consumer Rebate Program (CRP), residential customers would receive rebates for energy-efficient upgrades such as Cool Roofs, Energy Star Windows, HVAC upgrades, pool pumps and insulation upgrades. Such upgrades would serve to reduce wasteful energy and water usage and associated GHG emissions.

The Project includes the interior renovation of the existing manufacturing building at 1155 N. Las Palmas Avenue and would not involve the demolition, retrofit, or construction of residential uses. Therefore, the rebate programs established by the City and Los Angeles Department of Water and Power would not apply to the Project. However, the Project includes the construction of new buildings which would include energy-efficient measures such as enhanced energy-efficiency via high-performance glazing as well as

enhanced roof and deck insulation values in buildings. The air conditioning system would be comprised of highly efficient Variable Refrigerant Flow systems allowing for minimal electrical consumption. The winged roofs and second and third story balconies on Building A are designed to allow the building to take advantage of the natural lights and breeze which would result in correspondingly lower consumption

Consistency with the City Los Angeles Green LA

The Project would comply with performance-based standards included in the Green Building Code (e.g., current building energy efficiency standards). In addition, the Project would include enhanced energy-efficiency via high-performance glazing as well as enhanced façade, roof, and deck insulation. The air conditioning system would include Variable Refrigerant Flow systems that would allow for minimal electrical consumption. Enhanced filtration of outside air being delivered into occupied areas, operable windows and oversized folding glass walls would enhance the natural ventilation of the space. Water usage would be minimized via the use of ultra-low flow plumbing fixtures throughout the Project and all roof, balcony, and plaza deck drains would feed into a rainwater harvesting cistern.

For all of the reasons stated above, the Project would be consistent with, and would not conflict with, applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions. Impacts would be less than significant, and no mitigation measure are required.

Project Design Features

PDF GHG-1: The Project would be an all-electric development that would not require new connections to natural gas.

Also see **PDF TRAF-1** through **TRAF-4 and MM TRAF-1:**

PDF TRAF-1: Promotions and Marketing: The Project would provide marketing and promotional tools to educate and inform employees about site specific transportation options and effects of their travel choices and opportunities to alter their habits through the office employers. It is assumed that 100 percent of employees would be eligible to be involved with a promotions and marketing program, allowing for the full 4% VMT reduction.

PDF TRAF-2 Reduced Parking Supply: Pursuant to City Ordinance No. 185,480 (Bicycle Parking Ordinance), new or existing code-required vehicle parking spaces for all uses may be replaced by bicycle parking at a ratio of one vehicle space for every four bicycle spaces. Based on LAMC, the project would typically require 219 vehicle parking spaces. Per City Ordinance No. 185, project would provide 213 vehicle parking spaces, six (6) fewer than the LAMC requirement.

PDF TRAF-3 Bicycle Parking and Amenities: The project would provide 26 short-and long-term bicycle parking spaces, (i.e., 26 bicycle parking spaces consisting of 9 short-term and 17 long-term spaces), and amenities such as shower/changing facilities.

PDF TRAF-4: Construction Management Plan

The contractor would develop Construction Management Plan as part of the Project and submit it to the City of Los Angeles for approval to reduce the Project's potential construction impacts. The Construction Management Plan would include the following:

- Coordinate with the City to ensure adequate access to the Project Site and land uses in proximity of the Project site is maintained.
- Pick-ups and deliveries of construction materials should be scheduled off-peak hours to the extent possible.
- Reduce the potential of trucks waiting for extended periods to load or unload.
- Construction truck contractor should provide off-site staging in a legal area.
- Determine the number and location of flag men required during traffic rerouting and deliveries.
- Contractor to post construction notices/hotlines at several locations on the Project Site.
- Establish requirements for storage of materials and loading/unloading on the Project Site.
- Worksite traffic control plans approved by the City of Los Angeles should be implemented to route vehicles, bicyclists, and pedestrians around the area during any parking, travel lane or sidewalk closures.

MM TRAF-1 Rideshare Program: The Project would provide either designated parking spaces and loading zones for ridesharing vehicles and/or an internal website or program to coordinate rides. The rideshare program would be implemented through the office employers. It is assumed that 100 percent of employees would be eligible to be involved with a ridesharing program, allowing for the full 15% VMT reduction.

Cumulative Impacts

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and TACs, which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about 1 day), GHGs have much longer atmospheric lifetimes of 1 year to several thousand years that allow them to be dispersed around the globe.

It is generally the case that an individual project of this size and nature is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory. GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. The additive effect of Project-related GHGs would not result in a reasonably foreseeable cumulatively considerable contribution to global climate change. As discussed above, the Project would be consistent with applicable GHG reduction strategies recommended by the City and State. In addition, the Project would support and be consistent with relevant and applicable GHG emission reduction strategies in SCAG's RTP/SCS. These strategies include development in an urban infill location and within a relatively short distance of existing transit stops; providing employment near current transit stops and neighborhood commercial centers; and supporting alternative and electric vehicles via the installation of on- site electric vehicle charging stations. As a result, the Project would be consistent with the State's goals. Furthermore, the overwhelming majority of the Project-related GHG emissions are from source sectors that include electricity generated in-state or imported and the combustion of transportation fuels. These sectors are already covered entities under the Cap-and-Trade Program and as such would be reduced sector-wide in accordance with the goals of AB 32, in addition to the previously discussed GHG emissions reductions from the Project-specific energy efficiency design features, and VMT-

reducing characteristics. Given that the Project would generate GHG emissions consistent with applicable reduction plans and policies that therefore are less than significant, and given that GHG emission impacts are cumulative in nature, the Project's incremental contribution to cumulatively significant GHG emissions would be less than cumulatively considerable, and impacts would be less than significant.

4.9 HAZARDS AND HAZARDOUS MATERIALS

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

The following discussion is based on the *Phase I Environmental Site Assessment* (Phase I ESA), prepared by RMD Environmental Solutions and dated April 2021,[102] that was conducted to evaluate the presence of known or suspected hazardous materials or waste at the Project Site. The discussion is also based on

[102] RMD Environmental Solutions, Phase I Environmental Assessment, 11289-1146 and 1155 N. Las Palmas Avenue, Los Angeles, California, April 6, 2021.

the *Phase II Environmental Site Investigation* (Phase II) that was prepared for the Project Site by RMD Environmental Solutions, dated August 2021.[103]

The Phase I ESA included a review of environmental regulatory databases, aerial photographs, and topographic and fire insurance maps, as well as a reconnaissance survey of existing conditions of the Project Site. The Environmental Assessment was prepared in order to identify existing or potential recognized environmental conditions (RECs) affecting the Project Site that could indicate the potential for release of hazardous material into the environment. A REC is the presence or likely presence or any hazardous substances or petroleum products in, on, or at the property due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment. The Environmental Assessment also categorizes RECs as controlled RECs and/or historical RECs. A controlled REC is a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, and a historical REC is a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls.

The Phase II was conducted to assess whether contamination is present at the Project Site and included the advancement of 6 soil borings, installation of 12 subslab vapor sampling points, building surveys, and a combination of on-site soil, subslab vapor, soil vapor, indoor air, and ambient air sampling.

The Phase I and Phase II are both included in Appendix F.

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact.

Construction

Typical of many construction projects, construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. However, all materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. In addition, the Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials, including, but not limited to the Resource Conservation and Recovery Act, California Hazardous Waste Control Law, Federal and State Occupational Safety and Health Acts, SCAQMD rules, and permits and associated conditions issued by LADBS. These existing regulations are aimed at the amount of hazardous materials used, accident prevention, protection from exposure to specific chemicals, and the proper storage and disposal of hazardous materials. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. Accordingly, Project construction activities would not create a significant hazard to the public

[103] RMD Environmental Solutions, Phase II Environmental Site Investigation Report, North Las Palmas Avenue and North McCadden Place, Los Angeles, California, August 9, 2021.

or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials during construction. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant, and no mitigation measures would be required.

Operation

Operation of the Project's office and commercial uses would involve the use and storage of small quantities of potentially hazardous materials in the form of typical cleaning solvents, paint and painting supplies, pesticides for landscaping, and pool maintenance. The use of these materials would be in small quantities and in accordance with the manufacturers' instructions for use, storage, and disposal of such products. Moreover, as with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with manufacturer's standards and all applicable federal, state, and local requirements, such as California Hazardous Waste Control Law, Federal and California Occupational Safety and Health Acts, the Emergency Planning and Community Right-to-Know Act (Superfund Amendments and Reauthorization Act, Title III), and Safe Drinking Water and Toxic Enforcement Act, and Uniform Fire Code. Therefore, with compliance with manufacturer's standards and all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, operation of the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less than Significant Impact. As noted in the Phase I, based on historical records, by the late-1910s the Project Site was developed for residential uses. By the late-1940s, commercial/industrial buildings were located on the eastern portion of the Project Site, east of N. Las Palmas Avenue. The western portion of the Project Site, between N. McCadden Place and North Las Palmas Avenue was still occupied with residential uses. By the 1950s, the commercial/industrial buildings east of N. Las Palmas Avenue were occupied by a furniture cleaner, a carpet cleaner, a workshop, two machine shops, an assembling shop, and an electronics assembling shop. By 1955, the residences at 1155 N. Las Palmas Avenue were demolished and replaced with a parking lot. Between 1966 and 1969 all of the residential buildings were demolished and by 1970, the Project Site was in its current configuration with six commercial/industrial buildings and a parking lot. Since the 1980s, tenants of the Project Site were associated with photography and film. Based on typical chemical use, the historical use of the Project Site as machine shops (1138 and 1144 N. Las Palmas Avenue) and the more recent use of the Project Site for film and photography are considered RECs.

The Project could release hazardous materials into the environment during construction if spills of hazardous materials required for normal construction activities (vehicle fuels, paints, oils, and transmission fluids) occur, if asbestos-containing materials (ACMs) and lead-based paint (LBP) that may be encountered in Building B are not properly handled and disposed of, or if contaminated soils and/or groundwater are encountered during excavation and proper erosion controls and disposal methods are not implemented. The Project could also release hazardous materials into the environment during

operation if spills or emissions of hazardous materials required for normal operation of commercial land uses (cleaning solvents, paints, pesticides for landscaping, waxes, dyes, toners, bleach, grease, and petroleum products) occur.

Construction

Spills

During construction, standard construction BMPs for the use and handling of hazardous materials required for construction would be implemented to avoid or reduce the potential for spills and releases pursuant to local, state, and federal regulations such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and California Code of Regulations Title 22. Adherence to these regulations and immediate response and reporting of spills would ensure that significant hazards related to the release of hazardous materials into the environment during construction would not occur.

ACMs/LBPs

Based on the age of Building B, ACMs and LBP may be present in building materials that would be involved in the Project's renovation. However, the Project would be required to comply with existing regulations regarding the removal, transport, and disposal of ACMs and LBP that may be within the existing structure. In accordance with SCAQMD Rule 1403, the Project Applicant would be required to conduct a comprehensive asbestos survey prior to demolition, subject to approval by LADBS. In the event that ACMs are found within Building B, all demolition, transport, and disposal of known and suspected asbestos would be required to adhere to the regulations established in the California Code of Regulations, Title 8, Section 341.6(c), Code of Federal Regulations, Title 29, Section 1926.1101(b), Code of Federal Regulations, Title 40, Part 61, Subpart M, and SCAQMD Rule 1403. Demolition, transport, and disposal of known and suspected LBP would be required to adhere to the regulations established in the Code of Federal Regulations, Title 24, Section 35.86; Code of Federal Regulations, Title 40, Section 745.103; Code of Federal Regulations, Title 29, Section 1926.62; and California Code of Regulations, Title 8, Section 1532.1. In addition, development of the Project would include the use of commercially sold construction materials without asbestos or ACMs. Adherence to these regulations and procedures would ensure that all ACMs and LBP would be remediated and disposed of in accordance with federal, state, and local regulations. Therefore, the Project would not exacerbate environmental hazards related to risk of upset or accident conditions associated with the exposure of ACMs or LBP to the public or environment.

Contaminated Soils/Groundwater

A Phase I of the Project Site was prepared to identify potential RECs associated with the Project Site that may indicate the release of contaminants within the soil and groundwater beneath the Site. The Phase I identified potential RECs associated with: historical use of the Project Site (1138 and 1144 N. Las Palmas Avenue) as a machine shop in the 1950s through at least 1970; historical use of the Project Site (1145 N. Las Palmas Avenue) as an automotive repair facility in the 1940s; historical use of the Project Site (1128, 1138, and 1144 N. Las Palmas Avenue) for photography/film-related activities; historical use of an off-site area adjacent to the east as a machine shop/sheet metal shop in the 1950s through at least 1970; and historical off-site generation of hazardous waste adjacent to the north and east associated with imaging and print shops. These historical uses are associated with the use and generation of hazardous

materials, including halogenated/chlorinated solvents. In addition, based on the historical use of the Project Site and surrounding areas to the north and east, the Phase I determined that there is a potential for vapor migration at the Project Site if previous releases of halogenated/chlorinated solvents to the subsurface have occurred.[104]

Based on the findings of the Phase I, a Phase II was conducted of the Project Site to determine if contamination of the subsurface has occurred as the result of the above identified on- and off-site RECs. As summarized above, the Phase II included a combination of on-site soil, subslab vapor, soil vapor, indoor air, and ambient air sampling.

As detailed in the Phase II, low concentrations of total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), and metals were detected in the shallow soil. None of the samples analyzed reported TPH or VOC concentrations above applicable Commercial/Industrial, Residential, or California Background regulatory screening levels. One metal, arsenic, was detected above commercial/industrial and residential screening levels; however, because arsenic has naturally occurring background concentrations, the Department of Toxic Substance Control has determined that arsenic concentrations up to 12 milligrams per kilogram (mg/kg) is an acceptable background level, which was not exceeded by any of the analyzed soil samples. Based on the initial soil sample analysis results, additional testing was conducted to characterize the soil for disposal as hazardous waste and plan for grading. Analytical results were below applicable waste classification limits, and the Project Site soil does not fall under hazardous waste.[105]

Subslab and soil vapor testing detected benzene above Commercial/Industrial screening levels in 3 of 19 samples analyzed; 1,3-Butadiene was detected above the Commercial/Industrial screening level in 1 sample; and vinyl chloride and chloroform exceeded their respective Residential screening level but did not exceed their Commercial/Industrial screening levels. Tetrachloroethylene (PCE) was the predominant chemical detected, exceeding the Commercial/Industrial screening level in 15 of 19 samples analyzed, with the highest concentrations reported beneath the eastern portion of the Project Site. As detailed in the Phase II, several off-site potential sources of PCE contamination at the Project Site have been identified, including a northeast-southwest trending groundwater plume that originates to the north of the AVA Hollywood, upgradient to the Project Site, a former machine shop located east of the Project Site, and the Kodak site located downgradient of the Project Site. Based on the distribution of PCE detections in the subslab and soil vapor and the known PCE concentrations reported in groundwater up- and cross-gradient to the Project Site, the Phase II concluded that the Project Site's subsurface has been impacted by off-site source(s) of PCE; however, there is some potential that relatively low detections of PCE in a sample collected from the vicinity of 1155 N. Las Palmas Avenue on the western portion of the Project Site are a result of a small, localized on-site release off PCE as well.[106]

Based on the results of the subslab and soil vapor analytical results, indoor and ambient air sampling was performed. All detected VOC constituents were below applicable Commercial/Industrial screening levels,

[104] RMD Environmental Solutions, Phase I Environmental Assessment, 11289-1146 and 1155 N. Las Palmas Avenue, Los Angeles, California, April 6, 2021, pages iv-v.

[105] RMD Environmental Solutions, Phase I Environmental Assessment, 11289-1146 and 1155 N. Las Palmas Avenue, Los Angeles, California, April 6, 2021, pages 5-6, 11.

[106] RMD Environmental Solutions, Phase I Environmental Assessment, 11289-1146 and 1155 N. Las Palmas Avenue, Los Angeles, California, April 6, 2021, pages 8-9, 11-13.

with the exception of benzene, which was detected in all 12 indoor air samples and 3 ambient air samples. However, the highest concentration of benzene was detected in the ambient air samples, indicating an exterior source. PCE, carbon tetrachloride, 1,2-Dichloroethane, and 1,2-Dichloropropane were detected above their Residential screening levels but not above Commercial/Industrial screening levels.[107]

Based on the sampling results, the Phase II concluded that there is no evidence of significant on-site release of hazardous materials; a potential small, localized release in the vicinity of Building B is unconfirmed and detection of PCE at this location was low and does not present a vapor intrusion concern based on indoor air sampling. Based on the result of the subslab and soil vapor testing, the detection of PCE in the eastern portion of the Project Site likely originating from off-site source(s) also do not represent a vapor intrusion concern. Although concentrations of benzene in indoor air samples exceeded Commercial/Industrial screening levels, the higher concentration detected within ambient samples indicates an exterior (background) source, which would not require further action from the Project. In addition, based on the results of soil sampling, the Phase II concluded that excavated soil would not require special handling, stockpiling, or disposal as hazardous waste. The Phase II did not recommend or require mitigation measures to address any identified RECs at the Project Site.[108]

Operation

As previously discussed, the use of minor amounts of hazardous materials during operation of the Project would be limited to those similar to any other commercial urban development such as cleaning solvents, paints, and pesticides for landscaping. Such hazardous materials typical of commercial developments are not considered environmental concerns and their use by the Project would not differ dramatically in type and quantity from existing operations. Moreover, the use of such materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, state, and local agencies related to storage, use, and disposal of hazardous materials. In addition, as detailed above, based on the results of soil, subslab and soil vapor, and indoor and ambient air sampling, vapor intrusion as a result of subsurface conditions is not a concern for the Project Site. The Project Site is also not located within a Methane Zone or Methane Buffer Zone[109] and would, therefore, not experience methane seepage.

Based on the above, the Project would not encounter contaminated soil and/or ground water during construction and construction and operation would be subject to federal, state, and local regulations regarding the handling, storage, use, transport, and disposal of hazardous materials. As such, 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. Therefore, impacts would be less than significant, and no mitigation measures would be required.

[107] RMD Environmental Solutions, Phase I Environmental Assessment, 11289-1146 and 1155 N. Las Palmas Avenue, Los Angeles, California, April 6, 2021

[108] RMD Environmental Solutions, Phase I Environmental Assessment, 11289-1146 and 1155 N. Las Palmas Avenue, Los Angeles, California, April 6, 2021

[109] City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: http://zimas.lacity.org.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less than Significant Impact. There are three schools located within 0.25-mile of the Project Site: Hollywood Schoolhouse (1233 N. McCadden Place) located 0.1-mile to the northwest; Hubert Howe Bancroft Middle School (929 N. Las Palmas Avenue) located 0.2-mile to the south; and Beverly Hills RC School (6550 Fountain Avenue) located 0.24-mile to the northeast.

As discussed under a) and b) above, construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils typically used in construction. However, all such substances and materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions and are not expected to cause risk to the public or nearby schools. In addition, all construction work would be performed consistent with applicable federal OSHA Safety and Health Standards and Cal/OSHA requirements to ensure the safety and well-being of construction workers. Thus, with compliance with applicable laws, regulations, and manufacturers' instructions, the potential risks of exposure to hazardous materials for the public or the environment, including schools, due to Project construction would be less than significant. Therefore, impacts associated with the Project's use and storage of minor amounts of hazardous materials within 0.25-mile of schools would be less than significant and no mitigation measures would be required.

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 it create a significant hazard to the public or the environment?

Less than Significant Impact. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. The Phase I ESA included a search of such environmental records published by local, state, tribal, and federal agencies pursuant to Government Code Section 65962.5. The Project Site was listed on numerous environmental databases, as summarized below:

- 1128 North Las Palmas Avenue – Listed as Doyle Truman in the EDR HIST CLEANERS database. Listed as a rug cleaning and repair business in 1945.
- 1128 North Las Palmas Avenue – Listed as West Coast Photo, Inc. in the RCRA-SQG, FINDS, ECHO, HWTS, and HAZNET databases. Listed as a generator of hazardous waste, including photochemical and photo processing waste, metal sludge, and other inorganic solid waste between 1995 and 1998.
- 1138 North Las Palmas Avenue – Listed as Motionservio, Inc. in the HWTS and HAZNET databases. Listed as a generator of laboratory waste chemicals and detergent/soap in 1997.
- 1140 Las Palmas Avenue – Listed as Sunset Las Palmas Studios in the HWTS and HAZNET databases. Listed as having generated 2.3 tons of asbestos-containing waste in 2018.

- 1144 North Las Palmas Avenue – Listed as Las Palmas Productions, Inc. in the HWTS and HAZNET databases. Listed as a motion picture and video production business having generated halogenated solvents, liquids with halogenated organic compounds >1,000 mg/L, and other organic solids between 1992 and 2003.
- 1144 North Las Palmas Avenue – Listed as EFilm in the HWTS and HAZNET databases. Listed as a photographic film, paper, plate, and chemical manufacturing business, having generated halogenated solvents and other organic solids between 2002 and 2005.
- 1145 North Las Palmas Avenue – Listed as Dawson B J in the EDR Hist Auto database in 1942.
- 1136 North Las Palmas Avenue – Listed as Reid Miles, Inc. in the EMI database. The operations were overseen by the South Coast Air Quality Management District (SCAQMD) in 1987 and 1990. No additional information was provided in the listing.

The Phase I ESA identified these historical uses of the Project Site as indicated by their listings on environmental databases as a RECs for the Project Site. However, following analyses of soil, subslab and soil vapor, and indoor and ambient air samples, the Phase II concluded that there is no evidence of any significant on-site release of hazardous materials; a potential small, localized release in the vicinity of Building B is unconfirmed, and detection of PCE at this location was low and does not present a vapor intrusion concern based on indoor air sampling. The Phase II did not recommend or require mitigation measures to address any identified RECs at the Project Site.[110] Accordingly, the Project would not create a significant hazard to the public or the environment as a result of its listing on the above databases compiled pursuant to Government Code Section 65962.5. Therefore, impacts would be less than significant, and no mitigation measures would be 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 located approximately 7.5 miles south of the Hollywood-Burbank Airport and is not located within the Planning Boundary/Influence Area of the Hollywood-Burbank Airport. The Project Site is not located within an existing or projected runway protection zone or noise contour associated with any private or public airport. Therefore, no impacts would occur, and no mitigation measures would be required.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. A project would normally have a significant impact to hazards and hazardous materials if the project involved possible interference with an emergency response plan or emergency evacuation plan. The Project would not create such an impact. The Project Site is located in an established urban area that is well served by an existing roadway network. The Project Site is located along N. Las Palmas Avenue, N. McCadden Place, and Lexington Avenue, which are not designated as a Primary or Secondary Disaster Routes; however, Santa Monica Boulevard and Highland Avenue in the vicinity of the

[110] RMD Environmental Solutions, Phase I Environmental Assessment, 11289-1146 and 1155 N. Las Palmas Avenue, Los Angeles, California, April 6, 2021, page 14.

Project Site are identified as Primary Disaster Routes.[111] These Primary Disaster Routes would not be subject to any lane closures as a result of the Project. Development of the Project Site may require temporary and intermittent partial street closures along N. Las Palmas Avenue or N. McCadden Place, due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans.

Further, as discussed in Section 4.17, Transportation, as part of the Project, a detailed Construction Management Plan, included as PDF TRAF-5, would be implemented to minimize construction impacts for vehicles, bicyclists, and pedestrians. The Construction Management Plan would include measures such as off-site truck staging; scheduling deliveries and pick-ups of construction materials during non-peak travel periods; a worksite traffic control plan; use of flag men to reroute traffic around any closures to ensure that access would remain unobstructed for land uses in proximity to the Project Site. The Construction Management Plan would be prepared and submitted to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community and avoid congestion. Implementation of the Construction Management Plan would ensure that vehicle and emergency vehicle access would be maintained throughout the course of construction activities.

With regards to operation, the Project would not include or cause permanent alterations to vehicular circulation routes and patterns, impede public access, or travel upon public rights-of-way. Emergency vehicle access to the Project Site would be provided from N. Las Palmas Avenue. The Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency access within the vicinity of the Project Site.

Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and residents. Project Site access and circulation plans would be subject to review and approval by LAFD and LAPD.

No policy or procedural changes to an existing emergency response plan or evacuation plan would be required due to operation of the Project. Furthermore, during an unanticipated disaster event, City and County agencies (i.e., Police and Fire Departments) would implement operational protocols, as well as plans and programs, on a case by-case basis to facilitate emergency evacuations and/or response, which would consider traffic conditions at the time of the emergency. In such instances, traffic would be routed along the City's disaster routes, as determined appropriate, by the applicable responding City agencies. Compliance with existing regulations would ensure that implementation of the Project would not impair or physically interfere with an adopted emergency response plan or with an emergency evacuation plan. Impacts related to emergency response plans and emergency evacuation plans are less than significant and no mitigation measures are required.

[111] Los Angeles County Department of Public Works, Disaster Route Maps, South Los Angeles County, available at: https://pw.lacounty.gov/dsg/DisasterRoutes/map/Los%20Angeles%20Central%20Area.pdf

g) 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 not located within or near a state Responsibility Area or a Very High Fire Hazard Severity Zone.[112] In addition, the Project Site is located in a highly urbanized area of the City and does not include wildlands or high fire hazard terrain or vegetation. Furthermore, the Project would be developed in accordance with LAMC and LAFD requirements pertaining to fire safety. Therefore, the Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death as a result of exposure to wildland fires. As such, no impact would occur, and no mitigation measures would be required.

Cumulative Impacts

Like the Project, many of the related projects would use, handle, store, and/or transport hazardous materials or require demolition of structures containing such materials. Such related projects would be required to use, store, remove and/or transport all potentially hazardous materials in accordance with the manufacturers' instructions and handle materials in accordance with federal, State, and local health and safety standards and regulations. Compliance with existing standards and regulations would ensure that the related projects would not result in significant impacts to the public or the environment through the routine transport, storage, use, or handling of hazardous materials, and that their development would not result in the release of existing hazardous materials such as ACBMs, LBPs, radon gas, or PCBs. Some of the related projects may be on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, each related project would be required to comply with existing Federal, State, and local regulations related to hazardous materials sites, including cleanup sites, and hazardous materials generators.

Some of the related projects include the use of hazardous materials within 0.25-mile of a school. However, related projects would be subject to environmental review to evaluate potential impacts from hazardous materials releases within 0.25-mile of a school, thereby reducing impacts to less than significant. None of the related projects are within two miles of an airport land use plan, thereby reducing impacts to less than significant.

Some of the related projects may involve temporary construction encroachments into adjacent sidewalks or roadways. However, any changes to access and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and potential residents. All access and circulation plans would be subject to review and approval by the LAFD and would be developed to meet City standards for emergency access. The related projects would be developed within the existing urban grid and would not require alterations to emergency access routes and would not contribute to cumulative effects in concert with the Project.

Related projects are all located in highly urbanized areas, would not contain wildland features, and are not located adjacent to any wildland areas. Therefore, development of related projects would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

[112] City of Los Angeles Department of City Planning, Zone Information & Map Access System, available at: http://zimas.lacity.org.

4.10 HYDROLOGY AND WATER QUALITY

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

The following impact analysis pertaining to hydrology and water quality includes information on the existing and proposed topography/drainage and infrastructure for the Project Site provided in the *Hydrology & Hydraulics Report*, prepared by Kimley-Horn, December 22, 2022 (Hydrology Report). The Hydrology Report is included in Appendix G.

a) 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, as Project construction would disturb more than 1-acre of soil, the Project would be required to implement a Stormwater Pollution Prevention Plan (SWPPP) under the NPDES Construction General Permit. In accordance with the requirements of the NPDES Construction General Permit, the Project would prepare and implement a site-specific SWPPP adhering to the California Stormwater Quality Association Best Management Practices (BMP) Handbook. The SWPPP would set forth BMPs for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction. The SWPPP would be carried out in compliance with State Water Resources Control Board requirements and the Regional Water Quality Control Board, Los Angeles Region (LARWQCB), and would also be subject to review by the City for compliance with the City of Los Angeles' *Best Management Practices Handbook*, *Part A Construction Activities*. 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. For construction during the rainy season (October 1st to April 14th), the City's grading permit regulations require the implementation of a wet weather erosion control plan that would be prepared pursuant to the "Manual and Guideline for Temporary and Emergency Erosion Control," adopted by the Los Angeles Board of Public Works and incorporated into the City's Development Best Management Practices Handbook, Part A, Construction Activities.[113] Such requirements would be incorporated into the Project construction SWPPP. Controls for non-stormwater runoff would also be incorporated into the Project's SWPPP.

With the implementation of regulatory compliance requirements including site-specific BMPs included as part of the SWPPP required to comply with NPDES program requirements under federal and state law and City grading permit regulations, the Project would reduce or eliminate the discharge of potential pollutants from stormwater runoff. Therefore, with compliance with NPDES requirements and City grading regulations, construction of the Project would not result in discharge that would violate any water quality standard or waste discharge requirements or otherwise substantially degrade surface water

[113] LAMC Sections 91.7007.1 and 61.02.

quality. Thus, temporary construction-related impacts on surface water quality would be less than significant, and no mitigation measures are required.

Operation

Under Section 303(d) of the Clean Water Act, states are required to identify water bodies that do not meet their water quality standards. Biennially, the LARWQCB prepares a list of impaired waterbodies and the specific pollutant(s) in the region referred to as the 303(d) list. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL). The Project Site is located within and drains into the Los Angeles River Watershed Reach in the Los Angeles Basin. The Watershed encompasses an area of approximately 834 square miles and is bounded, at its headwaters, by the Santa Monica, Santa Susana, and San Gabriel mountains to the north and west.[114] According to SWRCB, constituents of concern listed for the Los Angeles River Watershed Reach 2 under California's Clean Water Act Section 303(d) List located include ammonia, copper, lead, indicator bacteria, nutrients (algae), oil, and trash.

Project operations would introduce sources of potential water pollution that are typical of commercial, and office uses including pollutants associated with runoff from landscaped areas (pesticides and fertilizers) and paved surfaces (oil/grease, cleaners, and trash). Stormwater runoff from precipitation events could also potentially carry urban pollutants into municipal storm drains.

However, the Project would be subject to the provisions of the City's Low Impact Development (LID) Ordinance (Ordinance 183,833), which is designed to mitigate the impacts of increases in runoff and stormwater pollution as close to the source as possible. Under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). As discussed in the Hydrology Report, and consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include constructing storm drainage infrastructure, including roof drains and downspouts, to convey on-site runoff to a stormwater treatment system. The proposed stormwater treatment system would consist of an underground rainwater harvesting cistern which would capture the stormwater runoff measuring up to the 85th percentile for on-site irrigation. On-site runoff that exceeds the required stormwater treatment volume will be pumped to a sump pump outlet control structure from the rain harvesting cistern and discharge to the curb face via a curb drain.

Under existing conditions, the Project Site is covered with hardscape. As described in the Hydrology Report, under existing conditions, the area of the Project Site where Buildings A and B are located is 100 percent impervious. After construction, the Project would include a new, three-story office building and courtyards that would include landscape planters with substantial soil depth for incidental stormwater treatment. Therefore, after construction of the Project, the area of the Project Site that contains Buildings A and B would be 97 percent impervious.

The analysis conducted for the Project in the Hydrology Report demonstrates that the proposed storm drainage infrastructure to convey on-site runoff to the proposed stormwater treatment system can retain

[114] California, State Water Resources Control Board, 2014 and 2016 California 303(d) List of Water Quality Limited Segments, www.waterboards.ca.gov/water_issues/programs/tmdl/2014_16state_ir_reports/category5_report.shtml, accessed April 8, 2021.

and treat sufficient quantities of stormwater to comply with the requirements of the LID Ordinance. Project site improvements will include constructing storm drainage infrastructure, including roof drains and downspouts, to convey onsite runoff to a stormwater treatment system. The proposed stormwater treatment system will consist of an underground rainwater harvesting cistern which will treat stormwater runoff for onsite irrigation use. However, in accordance with the LID Ordinance, the analysis required at final engineering during the final design process during building permit plan check with the City of Los Angeles Department of Public Works and the Los Angeles Department of Building and Safety will determine the ultimate BMPs at the Project Site needed to meet the LID Ordinance standard. Therefore, with the implementation of existing and proposed LID BMPs in compliance with the City's LID Ordinance and LID Manual, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. Impacts to surface water quality during operation of the Project would be less than significant, and no mitigation measures are required.

Groundwater Quality

Construction

Groundwater was encountered during subsurface exploration conducted as part of the Geotechnical Report at 51.5 feet below the ground surface; however, historically high groundwater depth in the vicinity is recorded as 20 feet below the ground surface and groundwater has been encountered by subsurface investigations on nearby parcels as high as 23 feet.[115] Excavation for the construction of the lowest subterranean level is anticipated to extend to a depth of approximately 35 feet below ground surface, including foundation excavations. Based on these considerations, groundwater may be encountered near the excavation bottom. Due to the depth of the proposed excavation and the potential for seasonal fluctuation in the groundwater level, temporary dewatering measures may be required to reduce groundwater during excavation and construction. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable regulations and requirements, including all relevant NPDES requirements related to construction and discharges from dewatering operations. NPDES requires that dischargers demonstrate that discharges do not violate any water quality objective/criteria for the receiving waters and do not exceed effluent limitations; perform an analysis using a sample of groundwater or wastewater to be discharged; show that discharges do not cause acute nor chronic toxicity in receiving waters and pass through a treatment system if necessary; and comply with the provisions of the NPDES permit. Furthermore, if dewatering is required, the treatment and disposal of the dewatered water would occur in accordance with the Los Angeles Regional Water Quality Control Board (LARWQCB) Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, LARWQCB Order No. R4-2018-0125 ("Dewatering Permit").[116]

Based on the above, construction of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirement associated with groundwater protection.

[115] Feffer Geological Consulting, Inc., Geotechnical Investigation Report, Proposed Three Story Building Over Three Subterranean Levels, 1139-1155 N. Las Palmas Avenue and 1138-1150 N. McCadden Place, Los Angeles, California, 90038, December 21, 2021, pages 17-18.

[116] See www.waterboards.ca.gov/losangeles/board_decisions/adopted_orders/general_orders/r4-2018-0125/OrderNoR4-2018-0125(Order).pdf, last accessed August 11, 2021.

Therefore, construction-related impacts on groundwater quality would be less than significant, and no mitigation measures would be required.

Operation

Additional operational activities that can affect groundwater quality include spills of hazardous materials and leaking underground storage tanks. No underground storage tanks are currently operating at the Project Site, nor would any be operated by the Project. While the Project's new building facilities would slightly increase the use of on-site hazardous materials, such as cleaning, maintenance, and landscaping supplies, compliance with all applicable existing regulations at the Project Site regarding the handling, storage, 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. Moreover, surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner in accordance with applicable regulatory requirements, thereby resulting in little threat to groundwater.

Therefore, Project operations would not violate any water quality standards or waste discharge requirements with respect to groundwater or otherwise substantially degrade ground water quality. The Project's potential impact on groundwater quality during operation would be less than significant, and no mitigation measures would be required.

b) 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, groundwater was encountered during subsurface exploration conducted as part of the Geotechnical Report at 51.5 feet below the ground surface; however, historically high groundwater depth in the vicinity is recorded as 20 feet below the ground surface and groundwater has been encountered by subsurface investigations on nearby parcels as high as 23 feet.[117] Excavation for construction of the lowest subterranean level is anticipated to extend to a depth of 35 feet below ground surface, including foundation excavations. Due to the depth of the proposed excavation and the potential for seasonal fluctuation in the groundwater level, temporary dewatering may be required. However, the Project would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations under the Dewatering Permit. Furthermore, since operation of dewatering systems would only be temporary, local groundwater hydrologic conditions, including groundwater production wells or public water supply wells within one mile of the Project Site, would not be affected by any Project dewatering operations, and regional impacts to groundwater supplies and management of the basin would not be considered significant Therefore, the Project's temporary construction activities would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable

[117] Feffer Geological Consulting, Inc., Geotechnical Investigation Report, Proposed Three Story Building Over Three Subterranean Levels, 1139-1155 N. Las Palmas Avenue and 1138-1150 N. McCadden Place, Los Angeles, California, 90038, December 21, 2021, pages 17-18.

groundwater management of the basin. Impacts on groundwater supplies during construction of the Project would be less than significant, and no mitigation measures would be required.

During operation, potable water would be supplied by the LADWP, which draws water supplies from distant sources, and which conducts its own assessments and mitigation of potential environmental impacts. The Project does not propose permanent dewatering. Furthermore, the entire Project Site is covered in impervious surfaces and does not currently provide a source of groundwater recharge. As noted in the Hydrology Report, under existing conditions where Building A would be constructed, the Project Site is 100 percent impervious. After construction, the Project would include a new, three-story office building and courtyards that would include landscape planters with substantial soil depth for incidental stormwater treatment. After construction of the Project, the Project Site would be 97 percent impervious.

As discussed in the Hydrology Report and consistent with LID requirements, the Project would include constructing storm drainage infrastructure, including roof drains and downspouts, to convey on-site runoff to a stormwater treatment system. The proposed stormwater treatment system would consist of an underground rainwater harvesting cistern which would capture the stormwater runoff measuring up to the 85th percentile for on-site irrigation. On-site runoff that exceeds the required stormwater treatment volume would be pumped to a sump pump outlet control structure from the rain harvesting cistern and discharged to the curb face via a curb drain. The Project would not result in infiltration of a large amount of rainfall that would affect groundwater hydrology, including the direction of groundwater flow. As such, the Project would not interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the West Coast Groundwater Basin.

Therefore, Project operations would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant, and no mitigation measures would be required.

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?

Less than Significant Impact.

Construction

The Project Site is not crossed by any water courses or rivers. Project construction activities, particularly including demolition and grading, have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. In addition, exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. On-site watering activities to reduce airborne dust could also contribute to pollutant loading in runoff, including into nearby storm drains. However, as discussed above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows from both stormwater and non-

stormwater discharges. These BMPs would be designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. In addition, Project construction activities would occur in accordance with City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion to be incorporated into the Project SWPPP. Thus, through compliance with all NPDES General Construction Permit requirements and a SWPPP that includes implementation of BMPs required by the NPDES program, as well as compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. As such, construction-related impacts regarding erosion and siltation would be less than significant, and no mitigation measures are required.

Operation

In its present condition, the Project Site is nearly 100 percent impervious, and stormwater discharges directly to N. Las Palmas Avenue and N. McCadden Place. As noted in the Hydrology Report under existing conditions, the area of the Project Site where Buildings A and B are located is 100 percent impervious. After construction, the Project would include a new, three-story office building and courtyards that would include landscape planters with substantial soil depth for incidental stormwater treatment. Therefore, after construction of the Project, the area of the Project Site that contains Buildings A and B would be 97 percent impervious.

As discussed above, the Project must comply with the City's LID Ordinance requirements to retain, treat and/or filter stormwater runoff to mitigate the impacts of any post-development increases in runoff. Pursuant to these requirements, the Project proposes to construct storm drainage infrastructure, including roof drains and downspouts, to convey on-site runoff to a stormwater treatment system. The proposed stormwater treatment system will consist of an underground rainwater harvesting cistern which will capture the stormwater runoff measuring up to the 85th percentile for on-site irrigation. On-site runoff that exceeds the required stormwater treatment volume will be pumped to a sump pump outlet control structure from the rain harvesting cistern and discharge to the curb face via a curb drain.

Although the Project would alter the drainage pattern of the Project Site through installation of site drains and harvesting cistern, such stormwater retention systems are designed to prevent runoff and erosion. Therefore, the effect of the Project's systems would be to maintain and enhance the existing on-site storm drain system which collects water on-site and connects to a stormwater main to transport it off-site. Accordingly, similar to existing conditions, there would be a limited potential for erosion or siltation to occur from exposed soils or large expanses of pervious areas. 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 erosion and siltation would be less than significant, and no mitigation measures are required.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact.

Construction

As discussed above, there are no streams or rivers within or immediately surrounding the Project Site. Construction activities for the Project would involve removal of the existing surface parking 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 and thus reducing runoff as compared to impermeable surfaces. As noted above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. These BMPs and erosion control measures would contain and treat, as necessary, stormwater or construction watering on the Project Site so runoff does not impact off-site drainage facilities or receiving waters. Thus, through compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in increased runoff or flooding on- or off-site. As such, construction-related impacts associated with flooding from surface runoff would be less than significant, and no mitigation measures are required.

Operation

As previously discussed, under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the proposed storm drainage infrastructure, including roof drains and downspouts, will convey post-development runoff to the Project's stormwater treatment system, consisting of an underground rainwater harvesting cistern, which will capture the stormwater runoff measuring up to the 85th percentile for reuse for on-site irrigation. On-site runoff that exceeds the required stormwater treatment volume will be pumped to a sump pump outlet control structure from the rain harvesting cistern and discharge to the curb face via a curb drain.

The Project would decrease the imperviousness of the area the Project Site where Buildings A and C are located from 100 percent to 97 percent, and would result in no increase in the volume of runoff as compared to existing conditions. As such, the Project would not increase the rate or amount of surface runoff in a manner which would result in substantial flooding on- or off-site during operation. Therefore, operational impacts associated with flooding from surface runoff would be less than significant, and no mitigation measures are 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?

Less Than Significant Impact.

Construction

As discussed above, there are no streams or rivers within or immediately surrounding the Project Site. Construction activities for the Project would involve removal of the existing surface parking 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 and thus reducing runoff as compared to impermeable surfaces. As noted above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. These BMPs and erosion control measures would contain and treat, as necessary, stormwater or construction watering on the Project Site so runoff does not impact off-site drainage facilities or receiving waters. Thus, through compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in increased runoff or flooding on- or off-site. As such, construction-related impacts associated with flooding from surface runoff would be less than significant, and no mitigation measures are required.

Operation

As previously discussed, under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the proposed storm drainage infrastructure, including roof drains and downspouts, will convey post-development runoff to the Project's stormwater treatment system, consisting of an underground rainwater harvesting cistern, which will capture the stormwater runoff measuring up to the 85th percentile for reuse for on-site irrigation. On-site runoff that exceeds the required stormwater treatment volume will be pumped to a sump pump outlet control structure from the rain harvesting cistern and discharge to the curb face via a curb drain.

The Project would decrease the imperviousness of the area the Project Site where Buildings A and C are located from 100 percent to 97 percent and would result in no increase in the volume of runoff as compared to existing conditions. As such, the Project would not increase the rate or amount of surface runoff in a manner which would result in substantial flooding on- or off-site during operation. Therefore, operational impacts associated with flooding from surface runoff would be less than significant, and no mitigation measures are required.

iv) Impede or redirect flood flows?

Less than Significant Impact. According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map, the Project Site is within Zone X, which is a designation for areas of minimal flooding.[118] The Project Site is not located with a 100-Year or 500-Year flood plain.[119] In addition, no watercourses that may overflow or breech a levee are located on or near the Project Site.[120]

[118] Federal Emergency Management Agency, Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1605F, effective September 26, 2008, available at: http://msc.fema.gov/portal .

[119] Phase I Environmental Site Assessment, 1128-1146 and 1155 North Las Palmas Avenue, Los Angeles, CA Prepared for the BARDAS Investment Group., Prepared by RMD Environmental Solutions, April 6, 2021

[120] City of Los Angeles Department of City Planning, Zone Information & Map Access System, available at: http://zimas.lacity.org.

The Project Site is also not located within a tsunami hazard area.[121] The Project Site is located within the inundation area of the Hollywood Reservoir and Mulholland Dam.[122] Thus, the Project would not substantially alter the existing drainage pattern of the site or area in a manner which would impede or redirect flood flows. No impacts would occur, and no mitigation measures are required.

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

Less than Significant Impact. The Project Site is not located within a tsunami or seiche zone.[123] Additionally, although the Project Site is located within the boundaries of the Hollywood Reservoir and Mulholland Dam inundation areas, this reservoir and dam, as well as others in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum considered earthquake for the site as well as other conditions that could undermine the integrity of the dam.

Pursuant to these regulations, the Mulholland Dam is regularly inspected and meets current safety regulations. In addition, the LADWP has emergency response plans to address any potential impacts to its dams. Furthermore, typical hazardous materials utilized by office and retail uses (e.g., cleaning, maintenance, and landscaping supplies) do not represent the type of use that would otherwise degrade water quality and would be properly stored and handled as to avoid spilling contents in an area that may encounter flood water. As such, the Project would not risk release of pollutants due to inundation. Therefore, impacts would be less than significant, and no mitigation measures are required.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

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

As previously detailed, construction of the Project would prevent the spread of contaminants into groundwater through compliance with all relevant NPDES requirements related to discharges from dewatering operations and would prevent the spread of contaminants into surface water through adherence to applicable regulations and BMPs for the handling and storing of hazardous materials, and the requirements of the NPDES Permit, including implementation of an SWPPP for the prevention of

[121] County of Los Angeles Department of Regional Planning, Los Angeles County General Plan Safety Element, Exhibit G: Inundation and Tsunami Hazard Areas, December 1990.

[122] City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, Exhibit G: Inundation and Tsunami Hazard Areas, August 8,1996.

[123] City of Los Angeles Department of City Planning, Zone Information & Map Access System, available at: http://zimas.lacity.org.

erosion and spread of polluted runoff. These regulations and practices were adopted to, and have been shown to, effectively control the potential stormwater pollution to surface water during construction.

Potential pollutants generated by the Project would be typical of retail and office land uses and may include sediment, nutrients, pesticides, trash and debris, oil and grease, and metals. As discussed above, the implementation of BMPs as required by the City's LID Ordinance would target the pollutants that could potentially be carried in stormwater runoff. The Project's stormwater treatment system, described above, would reduce stormwater pollutants in accordance with the City's LID requirements. 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.

Furthermore, the use and disposal of hazardous materials associated with operations of the office and retail uses would be typical in type and quantity of such uses. While new Building A and the addition to Building B would slightly increase the use of on-site hazardous materials, compliance with all applicable existing regulations at the Project Site regarding the handling, storage, 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. In addition, operation of the Project would not require direct groundwater extraction either through permanent dewatering or for water supply use.

Through 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 sustainable groundwater management plan. Therefore, impacts would be less than significant, and no mitigation measures are required.

Cumulative Impacts

The related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, as with the Project, the related projects would be subject to NPDES permit requirements for both construction and operation. It is anticipated that the related projects would be evaluated on an individual basis by the City during both site plan review and CEQA review (if applicable) to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. The Project would result in less than significant hydrology and water quality impacts and the Project is not proposed in a floodplain, would not impede/redirect flood flows, and would not be subject to inundation by 100-year flood flows, seiches or tsunamis. Therefore, the Project would not contribute considerably to cumulative hydrology and water quality impacts, and cumulative hydrology and water quality impacts would be less than significant.

4.11 LAND USE AND PLANNING

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

a) Physically divide an established community?

Less Than Significant Impact The Project Site is currently developed with manufacturing and office buildings and a surface parking lot. The Project would slightly expand the ground floor of the manufacturing building and convert its use to office and construct a new office building at the location of the existing parking lot. Development of the Project would remain within the boundaries of the existing Project Site and would result in further infill of an already developed community. Accordingly, it would not divide an established community. Therefore, impacts would be less than significant, and no mitigation measures are required.

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?

Less than Significant Impact. Under CEQA, the Project would conflict with an applicable plan if it does not meet the general intent of the plan and/or would obstruct the attainment of the plan's primary goals.[124] As discussed below, the Project would be substantially consistent with, and therefore not conflict with, all applicable plans, policies and regulations adopted for the purpose of avoiding or mitigating an environmental effect associated with development of the Project Site. These include the Southern California Association of Governments (SCAG) 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and the City of Los Angeles General Plan Framework Element (Framework Element) and Health and Wellness Element, Hollywood Community Plan, and City of Los Angeles Municipal Code (Chapter 1—Planning and Zoning). Therefore, impacts related to land use and planning would be less than significant, and no mitigation measures are required.

Locally, the Project Site is located within the jurisdiction of the City of Los Angeles and is therefore subject to the land use designations and zoning regulations of its local land use plans, redevelopment plans, and zoning ordinance, discussed below. The Project Site is also located within the regional jurisdiction of the Southern California Association of Governments, as discussed below

[124] State Planning and Zoning law (Government Code Section 65000, et seq.); Office of Planning and Research, State of California General Plan Guidelines; Sequoyah Hills Homeowners Association v. City of Oakland.

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is a Joint Powers Authority under California state law, established as an association of local governments and agencies that convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and, under state law, as a Regional Transportation Planning Agency and a Council of Governments. SCAG is the MPO for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. As the federally designated MPO, SCAG is mandated to research and create plans for transportation, growth management, hazardous waste management, and air quality.

SCAG 2020-2045 RTP/SCS

On September 30, 2008, SB 375 was passed to help achieve AB 32 goals related to the reduction of GHGs through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments, (2) regional allocation of the obligation for cities and counties to zone for housing, and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for CARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires MPOs to prepare an SCS within the RTP that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region.

For the past three decades, SCAG has prepared RTPs with the primary goal of increasing mobility for the region's residents and visitors. SCAG's overarching strategy for achieving its goals is the integration of land use and transportation. SCAG policies are directed toward the development of regional land use patterns that contribute to reductions in single occupancy vehicle use and vehicle miles traveled and improvements to the transportation system. The 2020-2045 RTP/SCS, also known as Connect SoCal, includes a strong commitment to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern.

The 2020-2045 RTP/SCS provides a blueprint for improving quality of life for residents by providing choices for where they will live, work, and play and how they will move around. It is designed to promote safe, secure, and efficient transportation systems to provide improved access to opportunities, such as jobs, education, and healthcare. Its emphasis on transit and active transportation is designed to allow residents to lead a healthier, more active lifestyle. Its goal is to create jobs, ensure the region's economic competitiveness through strategic investments in the goods movement system, and improve environmental and health outcomes for its residents by 2045. More importantly, the 2020-2045 RTP/SCS is also designed to preserve what makes the region special, including stable and successful neighborhoods and an array of open spaces for future generations.

Rooted in past RTP/SCS plans, Connect SoCal's "Core Vision" centers on maintaining and better managing the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and in "complete streets."[125] As detailed in Table 16 the Project would

[125] As defined in SCAG 2020–2045 RTP/SCS, p. 101, complete streets are streets designed and operated to enable safe access for all roadway users of all ages and abilities, including pedestrians, bicyclists, motorists, and transit riders. Complete Streets strategies can include traffic

not conflict with the applicable goals set forth in the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the goals of the 2020–2045 RTP/SCS to maximize the productivity of the region's transportation system as well as protect the environment and health of the region's residents through its location on an urban site in a TPA/HQTA in close proximity to mass transit option, thereby minimizing vehicle miles traveled. In addition, the Project would provide bicycle parking spaces and shower facilities that would serve to promote walking and use of bicycles. In addition, of the Project's 213 parking spaces, the Project would install electric vehicle supply equipment in 85 parking spaces and electric vehicle charging stations in 64 parking spaces, exceeding the City's Green Building Code requirements. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation.

The Project would also be consistent with the goals and policies set forth in Connect SoCal (**Table 17**), as the Project would develop a new creative office building and renovate an existing manufacturing building existing use to office and commercial uses. The Project would thereby increase the utilization of a property that is easily accessible by mass transit. Consistent with SCAG goals, the Project would increase employment opportunities in an area served by mass transit. Furthermore, the Project would result in an increase 346 new employees, consistent with SCAG's employment growth projections.

Table 17: Applicable Goals of SCAG 2020–2045 RTP/SCS

2020–2045 RTP/SCS Goals	Would the Project Conflict?
Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods. **Goal 4:** Increase person and goods movement and travel choices within the transportation system	**No Conflict.** Although these goals apply at a regional level, the Project would be developed on a currently developed Project Site located in an existing urbanized area with an established network of roads and freeways that provides local and regional access, including to the Project Site. The Project Site is within close proximity to several transit options. It is approximately 0.7 miles from the Hollywood and Highland Metro Station which serves the B Line (formally the Red Line) of the Metro Rail System. Numerous bus lines also serve the Project Site, including Metro bus lines 224 and 4 and the DASH Hollywood line. In addition, the Project would provide 26 bicycle parking spaces (17 long-term bicycle parking spaces and 9 short-term bicycle parking spaces, along with shower facilities, and the Project would meet the City Green Building Code Requirements for parking facilities equipped with EV charging stations and those capable of supporting future EVSE. The Project also includes multiple pedestrian-friendly features both within the Project Site and along its perimeter, including wayfinding signage and lighting, safety lighting, and separate pedestrian entrances. Given the Project Site's location in proximity to a variety of transportation options, the Project would maximize mobility, accessibility, and overall productivity of the transportation system by providing various opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking. With respect to safety, the roadways adjacent to the Project Site are part of the existing urban roadway network and contain

calming, bicycle priority streets (bicycle boulevards) and pedestrian connectivity to increase physical activity, improve connectivity to the regional bikeway/greenway networks, local businesses and parks.

2020–2045 RTP/SCS Goals	Would the Project Conflict?
	no sharp curves or dangerous intersections. The Project Site is located in a highly urbanized area that is already developed with roadways and infrastructure. All access and circulation associated with the Project would be designed and constructed in conformance with all applicable requirements established by the City's Department of Building and Safety, the LAFD, and the LAMC. The Project would not include any new roads that would result in an increase in hazards due to a design feature, and the Project's driveways would be designed according to LADOT standards. In addition, the Project would not result in incompatible uses as the proposed office and commercial uses are consistent with land uses in the vicinity of the Project Site. The Project would result in less-than-significant impacts with respect to VMT and conflicts with programs, plans, policies, and ordinances addressing the circulation system. Therefore, the Project would not conflict with these goals.
Goal 3: Enhance the preservation, security, and resilience of the regional transportation system.	**No Conflict.** Although this goal applies at the regional level, the Project would not conflict with its implementation. The Project would result in less-than-significant impacts with respect to conflicts with programs, plans, policies, and ordinances addressing the circulation system; VMT; and hazardous geometric design features. Furthermore, during construction of the Project, a Construction Management Plan would be implemented to ensure that adequate and safe access is available within and near the Project Site. Appropriate construction traffic control measures (e.g., signs, flag persons, etc.) would also be utilized to ensure that emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. During operation, the Project would not substantially increase hazards due to a geometric design feature or incompatible use. Therefore, the Project would not adversely affect the security and preservation of the regional transportation system, and the Project would not conflict with this goal**.**
Goal 5: Reduce greenhouse gas emissions and improve air quality. **Goal 6:** Support healthy and equitable communities. **Goal 7:** Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**No Conflict.** The Project would result in less-than-significant impacts related to air quality during construction and operation. Project impacts with respect to GHG emissions would be less than significant. As the Project would comply with Los Angeles Green Building Code and CALGreen standards. Specific Project design features to further support and promote environmental sustainability would include but would not be limited to**:** EVCS; material recycling stations; efficient HVAC systems; energy-efficient wall insulation and glazing units; high efficiency dual-flush and drip irrigation systems to promote reductions in indoor and outdoor water usage; Energy Star–labeled appliances; and water-efficient landscape design. These measures are intended to reduce GHG emissions, conserve water and energy, and improve air quality. The Project would be developed on a currently developed Project Site located within an existing urbanized area with an established transportation network of roads, freeways, and transit that provides local and regional access to the area, including the Project Site. Specifically, the Project is an infill development within an existing urbanized area. The Project Site is within close proximity to several transit options. It is approximately 0.7 miles from the Hollywood and Highland Metro Station which serves the B Line (formally the Red Line) of

2020–2045 RTP/SCS Goals	Would the Project Conflict?
	the Metro Rail System. Numerous bus lines also serve the Project Site, including Metro bus lines 224 and 4 and the DASH Hollywood line. The Project would also promote bicycle use through the provision of 26 bicycle parking spaces and shower facilities. The Project also includes multiple pedestrian-friendly features both within the Project Site and along its perimeter, including pedestrian-friendly features. In addition, the Project would provide landscaping and trees throughout the site and streets to provide a pedestrian-friendly environment. At buildout, a total of 13 new trees would be located on-site. Therefore, the Project would support healthy and equitable communities by improving air quality and encouraging active transportation. The Project would support the reduction of vehicle miles traveled and dependency on single-occupancy vehicles. As such, the Project would not conflict with the region's adaptation to a changing climate and would support an integrated regional development pattern and transportation network. Therefore, the Project would not conflict with these goals.
Goal 8: Leverage new transportation technologies and data-driven solutions that results in more efficient travel**.**	**No Conflict**. As discussed above, the Project would promote non-auto travel and reduce single-occupant vehicle trips by being located in a transit-rich area, providing bicycle parking and showers, and improving the pedestrian environment. The Project would also provide parking spaces that are equipped with EVCS and parking spaces prewired to support future EVCS. Therefore, the Project would not conflict with this goal.
Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats**.**	**No Conflict.** The Project Site is located in an urbanized area and is currently developed with commercial buildings and surface parking. Existing landscaping within the western portion of the Project Site includes one on-site tree and one street tree. Four one site trees are on the eastern portion of the Project Site which would not be disturbed. None of the on-site **o**r street trees is considered to be protected by the City of Los Angeles Tree Preservation Ordinance No. 186873. The Project would utilize standard tree protection practices and conform to all relevant tree removal/replacement measures in accordance with City regulations. No riparian or other sensitive natural community exists on-site, and no agricultural uses or operations occur on-site or in the vicinity. The Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the California Department of Conservation. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City of Los Angeles. Accordingly, development of the Project would not preclude the conservation of natural and agricultural lands and restoration of habitats. Thus, the Project would not conflict with this goal.
Source: Kimley-Horn, 2022. SCAG 2020–2045 RTP/SCS	

City of Los Angeles General Plan

Land uses on the Project Site are guided by the General Plan. The General Plan sets forth goals, objectives, and programs to guide day-to-day land use policies and to meet the existing and future needs and desires of the community, while integrating the seven state-mandated elements, including Land Use,

Transportation, Noise, Safety, Housing, Open Space, and Conservation, as well as the General Plan Framework Element and includes an Air Quality Element and Health and Wellness Element (Plan for a Healthy Los Angeles). The Land Use Element of the General Plan consists of the General Plan Framework Element, which addresses Citywide policies, and also includes the 35 community plans that guide land use at a local level. The Project Site is located in the Hollywood Community Plan Area, which is one of the 35 community plans of the Land Use Element. The following discusses the General Plan Framework Element and the Community Plan, which address land uses.

General Plan Framework Element

The General Plan Framework Element sets forth a citywide comprehensive long-range growth strategy and defines Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. Framework Element land use policies are implemented at the community level through community plans and specific plans. The Land Use Chapter of the Framework Element provides objectives and policies intended to serve as guidelines for the community plans. The consistency of the Project with applicable objectives and policies in the General Plan Framework Element is presented in **Table 18:** *Project Consistency with the Framework Element*. As shown, the Project would be consistent with the applicable objectives and policies.

Table 18: Total Project Greenhouse Gas Emissions

Objective/Policy	Would the Project Conflict?
Distribution of Land Uses	
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors	**No Conflict.** The Project would result in an additional 81,547 square feet of office space and 135 square feet of new retail space at the Project Site, thereby contributing to the diversity of businesses in the area. The Project would support existing nearby residential, commercial, service, and transit land uses by generating employment opportunities. The Project would attract new businesses to the area to spur economic vitality and provide additional job opportunities. The retail addition would create a valuable neighborhood-serving retail space.
Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.	**No Conflict.** The Project would promote an improved quality of life by constructing infill development near public transit options, which would reduce vehicle trips, vehicle miles traveled, and air pollution. In addition, the Project encourages alternative modes of transportation by including 26 bicycle parking stalls and bike amenities, such as two shower for each gender, and a total of 17 lockers within the parking garage. The Project would also improve air quality by installing electric vehicle supply equipment in 85 parking spaces and electric vehicle charging stations in 64 parking spaces, exceeding the City's Green Building Code requirements.
Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/ bicycle access and use in appropriate locations.	**No Conflict.** The Project would promote and provide access for all modes of travel, including pedestrians and cyclists. The Project would provide secure on-site bicycle parking, showers, and lockers to promote cycling. In addition, the elimination of driveways and widening of the sidewalk along N. McCadden Place, separation of pedestrian entrances from vehicle driveways along N. Las Palmas Avenue would improve pedestrian safety on adjacent streets. The installation of landscaping and enhanced pavement at pedestrian entrances, walkways, and the interior landscaping would promote the walkability of the adjacent streets and the Project Site. These improvements would emphasize pedestrian/ bicycle access and use.

Objective/Policy	Would the Project Conflict?
Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	**No Conflict.** The Project would provide new retail and expanded office uses in an urbanized area well-served by transit, and within walking distance of commercial uses. The creative office use would support the Project area's existing range of services and activities and would be consistent with the Community Plan land use designation. The retail addition would create a valuable neighborhood serving retail space.
Policy 3.15.5: Provide for the development of public streetscape improvements, where appropriate.	**No Conflict.** The Project would widen the sidewalk along N. McCadden Place and install landscaping and enhanced pavement at pedestrian entrances. The proposed landscaping would promote walkability along N. McCadden Place and Las Palmas Avenue and would enhance the built environment.
Urban Form and Neighborhood Design Chapter	
Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region.	**No Conflict.** The Project would develop additional office uses and new retail uses within a site well-served by transit options and already functioning as office space.
Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	**No Conflict.** The Project would replace a surface parking lot and metal fence with a visually interesting, modern-architectural office building using design and materials that would be compatible with the surrounding uses. In addition, the Project would enhance pedestrian walkability and safety through sidewalk widening along N. McCadden Place, separation and buffering of pedestrian entrances from vehicle entrances, and installation of landscaping, enhanced pavement, and street trees along N. McCadden Place and N. Las Palmas Avenue. The Project would be constructed to the latest resource-efficient requirements of the LA Green Building Code, thereby improving the quality of life and aesthetic quality of the public realm.
Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	**No Conflict.** With the exception of the small retail area, the Project would be closed to the general public. The Project would incorporate guidelines as identified in the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles Police Department. Such design guidelines provide security design measures for semi-public and private spaces, which may include but not be limited to, the use of security cameras, access control to the building, secured parking facility with key system, and well illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of building entrances in high-foot traffic areas. The Project would also include lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify and secure routes between parking areas and points of entry into the buildings.
Urban Form and Neighborhood Design Chapter	
Policy 7.2.6: Concentrate office development in regional mixed-use center, around transit stations, and within community centers.	**No Conflict.** The Project Site is situated in a mixed-use urban environment surrounded by residential, industrial, commercial, and community facility uses. The Project Site is within close proximity to several transit options. It is approximately 0.7 miles from the Hollywood and Highland Metro Station which serves the B Line (formally the Red Line) of the Metro Rail System. Numerous bus lines also serve the Project Site, including Metro bus lines 224 and 4 and the DASH Hollywood line. The Project would expand existing office uses on a site well-served by transit options, further concentrating office development around transit stations.

Objective/Policy	Would the Project Conflict?
Infrastructure and Public Services Chapter	
Policy 9.3.1: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.	**No Conflict.** The Project would minimize water usage via the use of ultra-low flow plumbing fixtures, a rainwater harvesting cistern for irrigation of the on-site landscaping, and automatic weather-based irrigation controllers with high efficiency irrigation emitters. The resulting reduction in water usage would result in a corresponding reduction the amount of flow entering the wastewater system.
Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	**No Conflict.** The Project would be required to obtain coverage under the NPDES Construction General Permit and would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, in accordance with NPDES Municipal Permit requirements, the Project would implement LID requirements throughout the operational life of the Project to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site in accordance with the City's LID Manual.
Objective 9.10: Ensure the water supply, storage, and delivery systems are adequate to support planned development.	**No Conflict.** The Project would be within the LADWP's current and projected available water supplies for normal, single-dry, and multiple-dry years. As such, the LADWP would be able to meet the water demand of the Project, as well as existing and planned future water demands of its service area. Further, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site. Therefore, the water supply, storage, and delivery systems would be adequate to support the Project's development.
Source: Kimley-Horn, 2022. City of Los Angeles, The Citywide General Plan Framework Element, readopted August 2001.	

Health and Wellness Element (Plan for a Healthy Los Angeles)

The Plan for a Healthy Los Angeles, the Health and Wellness Element of the City's General Plan, provides high-level policy vision, along with measurable objectives and implementation programs to elevate health as a priority for the City's future growth and development. The Plan includes the following seven goals: (1) Los Angeles, A Leader in Health and Equity; (2) A City Built for Health; (3) Bountiful Parks and Open Spaces; (4) Food that Nourishes the Body, Soul, and Environment; (5) An Environment Where Life Thrives; (6) Lifelong Opportunities for Learning and Prosperity; and (7) Safe and Just Neighborhoods. As such, the provisions of this plan element address a number of policies not directly tied to the physical environment. However, included within this General Plan element are policies pertaining to the arrangement of land uses within the City and building design procedures.

Because the Project would not conflict with the Plan for a Healthy Los Angeles policies as shown in **Table 19:** *Comparison of Project Characteristics to Applicable Policies of the Health and Wellness Element* impacts with respect to consistency with the Plan for a Healthy Los Angeles would be less than significant.

Table 19: Comparison of Project Characteristics to Applicable Policies of the Health and Wellness Element

Objective/Policy	Would the Project Conflict?
Policy 2.2 Healthy Building Design and Construction. Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for health living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building	**No Conflict.** The Project would be near public multiple transportation options, place new employment opportunities and commercial uses near jobs and transit, and provide ample bicycle parking and pedestrian infrastructure to incentivize increased biking and walking. The Project would encourage pedestrian travel by incorporating office and commercial uses and locating this development on a site located within walking distance of businesses in the area, as well as within

Objective/Policy	Would the Project Conflict?
materials and universally accessibility using existing tools, practices, and programs	close proximity to multiple transit options. Furthermore, the Project would include pedestrian-friendly landscaping and design, new perimeter streetscape improvements, that would enliven the pedestrian experience The Project would be required to comply with California Title 24 Building Standards Code and CALGreen Code. Energy saving and sustainable design would be incorporated throughout the Project.
Policy 5.1 Air Pollution and Respiratory Health: Reduce. Air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health	**No Conflict.** The Project would include characteristics and design features that support reductions in air emissions and encouragement of alternative modes of transportation, as discussed more fully in Sections 4.3, Air Quality, and 4.8, Greenhouse Gas Emissions, of this MND. The Project would provide employment opportunities in proximity to job centers in Los Angeles where people can live and work and have access to convenient modes of transportation that provides options for reducing reliance on automobiles and minimizing associated air pollutant emissions. The Project would be required to comply with California Title 24 Building Standards Code and CALGreen Code. Energy saving and sustainable design would be incorporated throughout the Project. In addition, the Project would install electric vehicle supply equipment in 85 parking spaces and electric vehicle charging stations in 64 parking spaces, exceeding the City's Green Building Code requirements.
Policy 5.7 Land Use Planning for Public Health and GHG Emission Reduction. Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors, and others susceptible to respiratory diseases.	**No Conflict.** The Project is consistent with the City's Land Use Plans (in particular the General Plan Framework and the Community Plan), which support a land use distribution pattern that increases employment opportunities near transit center and services, thus supporting the use of alternative transportation that could help reduce GHG emissions from private automobile travel.
Source: Kimley-Horn, 2022 City of Los Angeles Department of City Planning, Health and Wellness Element, adopted 2015, amended 2021.	

Hollywood Community Plan

The community plans are intended to promote an arrangement of land uses, streets, and services, which would encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community. The community plans are also intended to guide development in order to create a healthful and pleasing environment. The community plans coordinate development among the various communities of the City and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community. The Hollywood Community Plan guides land uses on the Project Site and in the surrounding areas within the Community Plan Area. **Table 20:** *Project Consistency with the Hollywood Community Plan* sets forth the Community Plan's goals and policies applicable to the Project and discusses the Project's consistency with each of them. As shown, the Project would be consistent with the applicable objectives and policies of the Hollywood Community Plan.

Table 20: Project Consistency with the Hollywood Community Plan

Objective/Policy	Would the Project Conflict?
Objective 1: To coordinate the development of Hollywood with that of other parts of the City of Los Angeles and the metropolitan area. To further the development of Hollywood as a major center of population, employment, retail services, and entertainment; and to perpetuate its image as the international center of the motion picture industry.	**No Conflict**. The Project would result in an additional 81,547 square feet of creative office space and 135 square feet of new retail space at the Project Site, thereby contributing to the diversity of businesses in the area. As a result, the Project would generate a net increase of approximately 346 employees on the Project Site, furthering the development of employment in the area.

Objective/Policy	Would the Project Conflict?
Objective 4: To promote economic well-being and public convenience through: a. Allocating and distributing commercial lands for retail, service, and office facilities in quantities and patterns based on accepted planning principles and standards. b. Designating land for industrial development that can be so used without determent to adjacent uses of other types, and imposing restrictions on the types and intensities of industrial uses as are necessary to this purpose. c. Encouraging the revitalization of the motion picture industry. d. Recognizing the existing concentration of medical facilities in East Hollywood as a center serving the medical needs of Los Angeles.	**No Conflict.** The Project would develop retail and creative office uses consistent with the underlying zoning and land use designation, as well as the current and planned uses of the Site and surroundings.
Objective 6: To make provision for a circulation system coordinated with land uses and densities and adequate to accommodate traffic; and to encourage the expansion and improvement of public transportation service.	**No Conflict.** While this is a citywide objective, the Project would support its implementation. Specifically, the Project Site is located in a highly urbanized area that is well-served by public transit. The Project would include various streetscape improvements such as additional on site and street trees and landscaping to encourage walkability. Furthermore, the Project would provide approximately short- and long-term bicycle parking spaces, per LAMC requirements. Thus, the Project would promote opportunities for the use of alternative modes of transportation, including use of public transportation, walking, and bicycling.
Source: Kimley-Horn, 2022 City of Los Angeles Department of City Planning, Hollywood Community Plan, adopted December 13, 1988.	

Los Angeles Municipal Code

Development of the Project Site is subject to the constraints of the Los Angeles Municipal Code (LAMC), especially Chapter I, the Planning and Zoning Code, Article 2, Section 12.17.6 "M1" Limited Industrial Zone and Section 12.21 General Provisions. The Project is requesting the following discretionary entitlements, reviews, permits, and approvals:

- **Site Plan Review.** Pursuant to the Los Angeles Municipal Code ("LAMC") Section 16.05, the Applicant requests Site Plan Review to allow the demolition an existing parking lot and the construction of a three-story, approximately 80,987-square-foot office building with three levels of subterranean parking, retain four existing buildings at 1128 to 1146 N. Las Palmas Avenue, and renovate an existing building at 1155 N. Las Palmas Avenue, change use to office, and construct an approximately 695-square-foot addition on the ground floor.
- **Conditional Use Permit.** Pursuant to the Los Angeles Municipal Code ("LAMC") Section 12.24-A19, to allow FAR Averaging in a Unified Development in the C zone.
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, haul route approval, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

The following paragraphs discuss the Project's compliance with the building standards of the LAMC.

Land Use

The Project Site is currently zoned [Q]M1-1VL-SN and is located within the Hollywood Community Plan Area, which designates the land use of the property as Limited Manufacturing. The M1 zone permits commercial and light industrial uses. The Qualified Classification (Q Classification) was adopted by the City Council in 1989 with Ordinance Number 164,704, and limits the commercial uses allowed at the Project Site to those permitted in the C4 zone, which include office, retail, and restaurant uses. The M1 zone has an unlimited height, but the Height District No. IVL restricts the height of development to 45 feet, three stories, and a FAR of 1.5:1.

With approval of the CUP requested under LAMC Section 12.24-A19, to allow FAR Averaging in a Unified Development in the C zone, the Project's FAR of 1.38:1 would be consistent with the applicable zoning regulations.

Floor Area

The Project Site is subject to the FAR requirements of LAMC Section 21.21.1.A, which allows a FAR not to exceed 1.5:1 for "M" zones in Height District 1VL. The Project Site has a lot area of 89,752 square feet. The Project is requesting approval of a CUP under LAMC Section 12.24-A19, to allow FAR Averaging in a Unified Development in the C zone. With a total proposed floor area of 123,410 square feet, and approval of the requested CUP, the Project would result in a FAR of 1.38:1. As such, with approval of the requested CUP, the Project's proposed FAR would be consistent with the zoning regulations governing allowable floor area at the Project Site.

Height

Development of the Project Site is subject to the height restrictions of LAMC Section 21.21.1.A, which restrict the height of development to 45 feet and three stories for "M" zones in Height District 1VL. The Project's new building would have a maximum height of 45 (50 feet to the top of the parapet) and three stories. As such, the Project's proposed height would be consistent with the zoning regulations governing the allowed height at the Project Site.

Setbacks

Development of the Project Site is subject to the setback requirements of LAMC Section 12.17.6 C, which have no front, rear, or side yard setback requirements for industrial or commercial uses.

Cumulative Impacts

The Project would be substantially consistent with applicable land use plans, policies and regulations and would result in less than significant land use and planning impacts. Specifically, the Project would not physically divide an established community, and would not cause a significant environmental impact due to a conflict with a land use plan, policy or regulation adopted for the propose of avoiding or mitigating an environmental effect. As with the Project, the related projects would be reviewed on a case-by-case basis to ensure consistency with existing land use policies and regulations. Where inconsistencies occur for the related projects, it is anticipated that appropriate actions would be undertaken to ensure that land use impacts would be less than significant. Thus, cumulative land use impacts would be less than significant.

4.12 MINERAL RESOURCES

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

a) 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. As noted in the Phase I ESA, no oil wells were identified on or near the Project Site.[126] Additionally, the Project Site is not located within an oil field or oil drilling area,[127] or within a surface mining district or MRZ-2 zone.[128] The Project Site is currently designated for Limited Industrial land uses and not for mineral extraction land uses. Furthermore, the Project would not involve mineral extraction activities, nor are any such activities presently occurring on the Project Site. Accordingly, the Project would not result in the loss of availability of a known mineral resource of statewide or regional importance. Therefore, no impact would occur, and no mitigation measures would be required.

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?

No Impact. In addition to oil and gas resources, mineral resources of local value in the City of Los Angeles include sand and gravel deposits and mining operations. Sand and gravel resources and mining operations are concentrated in the Sylmar community of the north San Fernando Valley.129 Sand and gravel resources do not occur in the section of the Los Angeles basin occupied by the Project Site. Because the Project would not encroach on the City's existing sand and gravel mining operations or known sand and gravel resources, it would not result in the loss of availability of these locally important mineral resources. Therefore, there would be no impact to locally important mineral resources, and no mitigation measures would be required.

[126] RMD Environmental Solutions, Phase I Environmental Assessment, 11289-1146 and 1155 N. Las Palmas Avenue, Los Angeles, California, April 6, 2021.

[127] City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit E, Oil Field and Oil Drilling Areas, Adopted November 1996.

[128] City of Los Angeles Department of City Planning, Los Angeles City General Plan Conservation Element, Exhibit A, Mineral Resources, Adopted September 2001.

[129] City of Los Angeles General Plan, Conservation Element, 2001. Appendix A. https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf, Accessed August 16, 2022.

Cumulative Impacts

The Project Site is not located within a City-designated Mineral Resource Zone or a mineral producing area as classified by the California Geological Survey such that the Project would not result in the loss of a locally important mineral resource recovery site. Furthermore, no mineral resources or extraction operations for such resources occur in the Project Site vicinity. Therefore, the Project would not contribute considerably to cumulative mineral resources impacts, and cumulative mineral resources impacts would be less than significant.

4.13 NOISE

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

The analysis below is based on the *Acoustical Assessment, 1151 N. Las Palmas Project*, prepared by Kimley-Horn, December 2022 and included as Appendix H.

Background

Acoustics is the science of sound. Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a medium (e.g., air) to human (or animal) ear. If the pressure variations occur frequently enough (at least 20 times per second), they can be heard and are called sound. The number of pressure variations per second is called the frequency of sound and is expressed as cycles per second, or hertz (Hz).

Noise is defined as loud, unexpected, or annoying sound. The fundamental model consists of a noise source, a receptor, and the propagation path between the two. The loudness of the noise source, obstructions, or atmospheric factors affecting the propagation path, determine the perceived sound level and noise characteristics at the receptor. Acoustics deal primarily with the propagation and control of sound. A typical noise environment consists of ambient noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this ambient noise is the sound from individual local sources. These sources can vary from an occasional aircraft or train passing by to continuous noise from traffic on a major highway. Perceptions of sound and noise are highly subjective from person to person.

Measuring sound directly in terms of pressure would require a large range of numbers. To avoid this, the decibel (dB) scale was devised. The dB scale uses the hearing threshold of 20 micro-pascals (µPa) as a point of reference, defined as 0 dB. Other sound pressures are then compared to this reference pressure, and the logarithm is taken to keep the numbers in a practical range. The dB scale allows a million-fold

increase in pressure to be expressed as 120 dB, and changes in levels correspond closely to human perception of relative loudness.

Human Response to Noise

The human response to environmental noise is subjective and varies considerably from individual to individual. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to undue stress and annoyance. The health effects of noise in the community arise from interference with human activities, including sleep, speech, recreation, and tasks that demand concentration or coordination. Hearing loss can occur at the highest noise intensity levels.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day or night or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60 to 70 dBA range, and high above 70 dBA. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet, suburban, residential streets with noise levels around 40 dBA.[130] Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate-level noise environments are urban residential or semi-commercial areas (typically 55 to 60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60 to 75 dBA) or dense urban or industrial areas (65 to 80 dBA). Regarding increases in dBA, the following relationships should be noted[131]:

- Except in carefully controlled laboratory experiments, a 1-dBA change cannot be perceived by humans.
- Outside of the laboratory, a 3-dBA change is considered a just-perceivable difference.
- A minimum 5-dBA change is required before any noticeable change in community response would be expected. A 5-dBA increase is typically considered substantial.
- A 10-dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

Effects of Noise on People

Hearing Loss. While physical damage to the ear from an intense noise impulse is rare, a degradation of auditory acuity can occur even within a community noise environment. Hearing loss occurs mainly due to chronic exposure to excessive noise but may be due to a single event such as an explosion. Natural hearing loss associated with aging may also be accelerated from chronic exposure to loud noise. The Occupational Safety and Health Administration has a noise exposure standard that is set at the noise threshold where hearing loss may occur from long-term exposures. The maximum allowable level is 90 dBA averaged over 8 hours. If the noise is above 90 dBA, the allowable exposure time is correspondingly shorter.

[130] Compiled from James P. Cowan, Handbook of Environmental Acoustics, 1994 and Cyril M. Harris, Handbook of Noise Control, 1979.

[131] Compiled from California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013, and FHWA, Noise Fundamentals, 2017.

Annoyance. Attitude surveys are used for measuring the annoyance felt in a community for noises intruding into homes or affecting outdoor activity areas. In these surveys, it was determined that causes for annoyance include interference with speech, radio and television, house vibrations, and interference with sleep and rest. The L_{dn} as a measure of noise has been found to provide a valid correlation of noise level and the percentage of people annoyed. People have been asked to judge the annoyance caused by aircraft noise and ground transportation noise. There continues to be disagreement about the relative annoyance of these different sources. A noise level of about 55 dBA L_{dn} is the threshold at which a substantial percentage of people begin to report annoyance[132].

Ground-Borne Vibration

Sources of ground-borne vibrations include natural phenomena (earthquakes, volcanic eruptions, sea waves, landslides, etc.) or man-made causes (explosions, machinery, traffic, trains, construction equipment, etc.). Vibration sources may be continuous (e.g., factory machinery) or transient (e.g., explosions or heavy equipment use during construction). Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Several different methods are typically used to quantify vibration amplitude. One is vibration decibels (VdB) (the vibration velocity level in decibel scale). Other methods are the peak particle velocity (PPV) and the root mean square (RMS) velocity. The PPV is defined as the maximum instantaneous positive or negative peak of the vibration wave. The RMS velocity is defined as the average of the squared amplitude of the signal. The PPV and RMS vibration velocity amplitudes are used to evaluate human response to vibration.

Table 21: *Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibrations***,** displays the reactions of people and the effects on buildings produced by continuous vibration levels. The annoyance levels shown in the table should be interpreted with care since vibration may be found to be annoying at much lower levels than those listed, depending on the level of activity or the sensitivity of the individual. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. Low-level vibrations frequently cause irritating secondary vibration, such as a slight rattling of windows, doors, or stacked dishes. The rattling sound can give rise to exaggerated vibration complaints, even though there is very little risk of actual structural damage. In high noise environments, which are more prevalent where ground-borne vibration approaches perceptible levels, this rattling phenomenon may also be produced by loud airborne environmental noise causing induced vibration in exterior doors and windows.

Ground vibration can be a concern in instances where buildings shake, and substantial rumblings occur. However, it is unusual for vibration from typical urban sources such as buses and heavy trucks to be perceptible. Common sources for ground-borne vibration are planes, trains, and construction activities such as earthmoving which requires the use of heavy-duty earth moving equipment. For the purposes of this analysis, a PPV descriptor with units of inches per second (in/sec) is used to evaluate construction-generated vibration for building damage and human complaints.

[132] Federal Interagency Committee on Noise, Federal Agency Review of Selected Airport Noise Analysis Issues, August 1992.

Table 21 : Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibrations

Maximum PPV (in/sec)	Vibration Annoyance Potential Criteria	Vibration Damage Potential Threshold Criteria	FTA Vibration Damage Criteria
0.008	--	Extremely fragile historic buildings, ruins, ancient monuments	--
0.01	Barely Perceptible	--	--
0.04	Distinctly Perceptible	--	--
0.1	Strongly Perceptible	Fragile buildings	--
0.12	--	--	Buildings extremely susceptible to vibration damage
0.2	--	--	Non-engineered timber and masonry buildings
0.25	--	Historic and some old buildings	--
0.3	--	Older residential structures	Engineered concrete and masonry (no plaster)
0.4	Severe	--	--
0.5	--	New residential structures, Modern industrial/commercial buildings	Reinforced-concrete, steel or timber (no plaster)
PPV = peak particle velocity; in/sec = inches per second; FTA = Federal Transit Administration			
Source: California Department of Transportation, Transportation and Construction Vibration Guidance Manual, 2020 and Federal Transit administration, Transit Noise and Vibration Assessment Manual, 2018.			

Regulatory Setting

Federal

Federal Transit Administration Noise and Vibration Guidance

The Federal Transit Administration (FTA) has published the Transit Noise and Vibration Impact Assessment Manual (FTA Transit Noise and Vibration Manual) to provide guidance on procedures for assessing impacts at different stages of transit project development.[133] The report covers both construction and operational noise impacts and describes a range of measures for controlling excessive noise and vibration. In general, the primary concern regarding vibration relates to potential damage from construction. The guidance document establishes criteria for evaluating the potential for damage for various structural categories from vibration.

State of California

California Government Code

California Government Code Section 65302(f) mandates that the legislative body of each county and city adopt a noise element as part of its comprehensive general plan. The local noise element must recognize the land use compatibility guidelines established by the State Department of Health Services.[134] The guidelines rank noise land use compatibility in terms of "normally acceptable", "conditionally acceptable", "normally unacceptable", and "clearly unacceptable" noise levels for various land use types. Single-family homes are "normally acceptable" in exterior noise environments up to 60 CNEL and "conditionally acceptable" up to 70 CNEL. Multiple-family residential uses are "normally acceptable" up to 65 CNEL and

[133] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018

[134] State of California Governor's Office of Planning and Research, General Plan Guidelines, Appendix D: Noise Element Guidelines, page 374, 2017, https://opr.ca.gov/docs/OPR_COMPLETE_7.31.17.pdf. Accessed December 2022.

"conditionally acceptable" up to 70 CNEL. Schools, libraries, and churches are "normally acceptable" up to 70 CNEL, as are office buildings and business, commercial, and professional uses.

Title 24 – Building Code

The State's noise insulation standards are codified in the California Code of Regulations, Title 24: Part 1, Building Standards Administrative Code, and Part 2, California Building Code. These noise standards are applied to new construction in California for interior noise compatibility from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are located near major transportation noise sources, and where such noise sources create an exterior noise level of 65 dBA CNEL or higher. Acoustical studies that accompany building plans must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new multi-family residential buildings, the acceptable interior noise limit for new construction is 45 dBA CNEL.

Local

City of Los Angeles Municipal Code

The City has adopted regulations to control unnecessary, excessive, and annoying noise, as set forth in the City's Noise Ordinance (Chapter XI, Noise Regulation, of the Los Angeles Municipal Code [LAMC]). The City's Noise Ordinance establishes acceptable ambient sound levels to regulate intrusive noises (e.g., stationary mechanical equipment and vehicles other than those traveling on public streets) within specific land use zones and provides procedures and criteria for the measurement of the sound level of noise sources. These procedures recognize and account for differences in the perceived level of different types of noise and/or noise sources.

Section 111.02 (Sound Level Measurement Procedure and Criteria) of the LAMC provides procedures and criteria for the measurement of the sound level of "offending" noise sources. According to the LAMC, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line is considered a noise violation. Section 112.01 (Radios, Television Sets, and Similar Devices) of the LAMC prohibits the production of noise from any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area, or that exceeds the ambient noise level on the premises of any other occupied property, or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, by more than 5 dBA.

Section 112.02 (Air Conditioning, Refrigeration, Heating, Pumping, Filtering Equipment) limits increases in ambient noise levels created by air conditioning, refrigeration, heating, pumping, and filtering equipment. Such equipment may not be operated in such manner as to create any noise which would cause the noise level on the premises of any other occupied property, or, if a condominium, apartment house, duplex, or attached business, within any adjoining unit, to exceed the ambient noise level by more than 5 dBA.

Section 112.05 of the LAMC sets a maximum noise level for construction equipment of 75 dBA at a distance of 50 feet when operated within 500 feet of a residential zone. Compliance with this standard is

required only where "technically feasible."[135] Section 41.40 (Noise Due to Construction, Excavation Work – When Prohibited) of the LAMC prohibits construction between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday (i.e., construction is allowed Monday through Friday between 7:00 A.M. to 9:00 P.M.; and Saturdays and National Holidays between 8:00 A.M. to 6:00 P.M.).

City of Los Angeles General Plan

The Noise Element of the Los Angeles City General Plan (Noise Element) provides guidance for the control of noise to protect residents, workers, and visitors from potentially adverse noise impacts. Its primary goal is to regulate long-term noise impacts to preserve acceptable noise environments for all types of land uses. The Noise Element defers regulation of temporary, point-source noises such as construction activities to the City's Municipal Code Noise Ordinance. With regard to long-term noise impacts, the Noise Element contains stated goals, objectives, policies, and implementation programs for noise control.

Goal: A city where noise does not reduce the quality of urban life.

Objective 2: Reduce or eliminate nonairport related intrusive noise, especially relative to noise sensitive uses.

Policy 2.2: Enforce and/or implement applicable city, state and federal regulations intended to mitigate proposed noise producing activities, reduce intrusive noise and alleviate noise that is deemed a public nuisance.

Objective 3: Reduce or eliminate nonairport related intrusive noise, especially relative to noise sensitive uses.

Policy 3.1: Develop land use policies and programs that will reduce or eliminate potential and existing noise impacts.

Implementation P5: Continue to enforce, as applicable, city, state and federal regulations intended to abate or eliminate disturbances of the peace and other intrusive noise.

Implementation P11: For a proposed development project that is deemed to have a potentially significant noise impact on noise sensitive uses, as defined by this chapter, require mitigation measures, as appropriate, in accordance with California Environmental Quality Act and city procedures.

Implementation P16: Use, as appropriate, the "Guidelines for Noise Compatible Land Use" (Exhibit I),1 or other measures that are acceptable to the city, to guide land use and zoning reclassification, subdivision, conditional use and use variance determinations and environmental assessment considerations, especially relative to sensitive uses, as defined by this chapter, within a CNEL of 65 dB airport noise exposure areas and within a line-of-sight of freeways, major highways, railroads or truck haul routes.

[135] In accordance with Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools), "technically feasible" means that the established noise limitations can be complied with at a project site, with the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques employed during the operation of equipment.

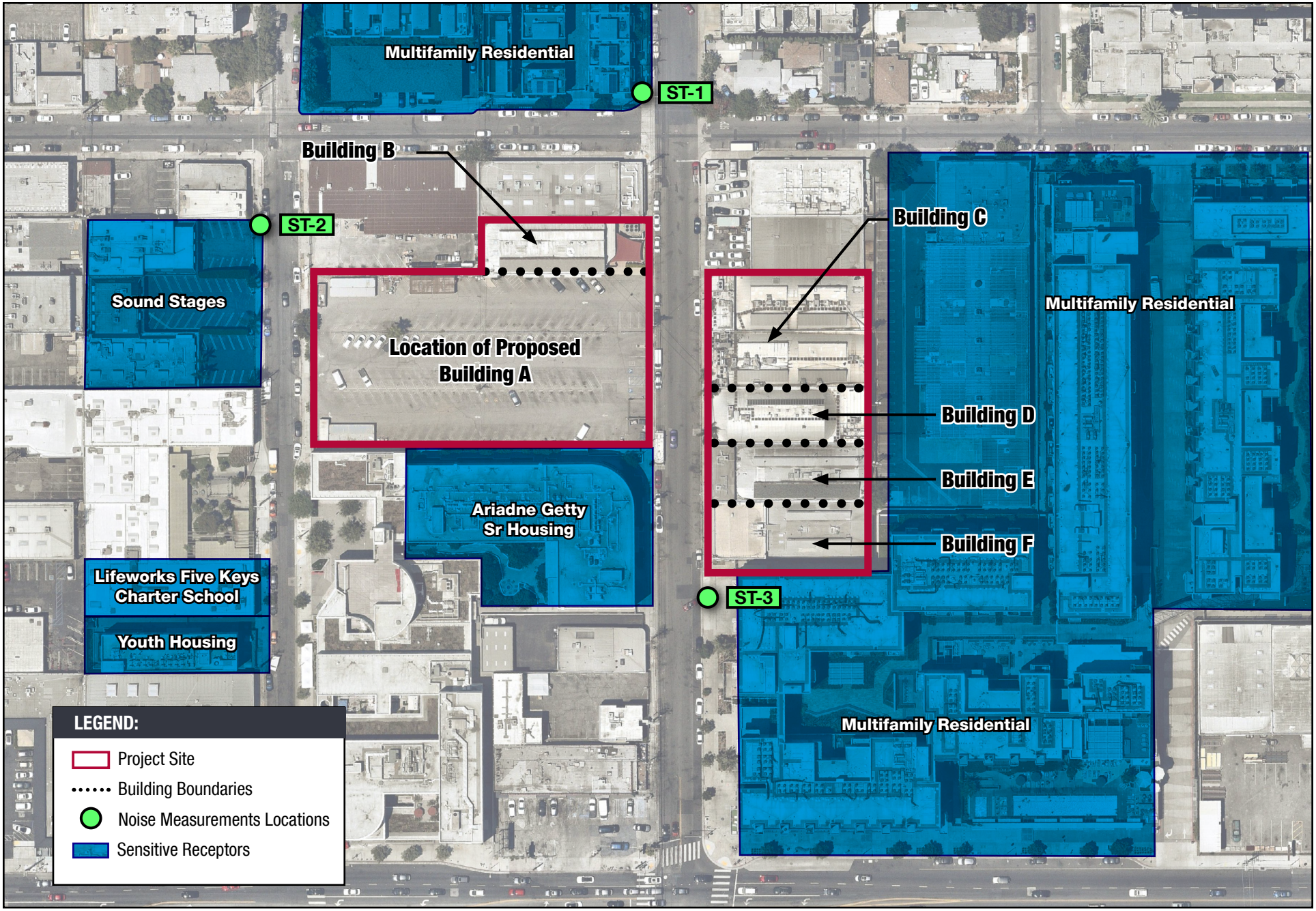
Existing Noise Sources

The Project Site is impacted by various noise sources. Mobile sources of noise, including traffic along Santa Monica Boulevard, N. McCadden Place, and N. Las Palmas Avenue are the most common and prominent sources of noise in the Project Site area. Other noticeable sources of noise on and near the Project Site include parking lot noise and mechanical equipment (e.g., heating, ventilation, and air conditioning [HVAC] units) operating at the Project Site and existing nearby commercial and residential uses, and other urban-related activities (e.g., idling cars/trucks, pedestrians, car radios and music playing, dogs barking, etc.).

Noise Measurements

To quantify existing ambient noise levels in the Project Site area, Kimley-Horn conducted three short-term (15-minute) measurements on August 8, 2022.[136] The noise measurement sites were selected to be representative of the existing ambient noise levels at the noise-sensitive uses immediately adjacent to the Project Site. The 15-minute daytime measurements were taken between 8:45 a.m. and 9:30 a.m. Measurements of L_{eq} are considered representative of the noise levels throughout the day. The average noise levels measured at each location are listed in **Table 22***: Existing Noise Measurement Locations and Measurements* and shown on **Figure 23:** *Noise Measurement Locations.*

[136] The ambient noise measurements were taken in accordance with the City's standards, which require ambient noise to be measured over a period of at least 15 minutes; see Section 111.01 of the LAMC.



Source: Nearmap, 2022

FIGURE 23: Noise Measurement Locations
1151 Las Palmas

Kimley»Horn

Table 22: Existing Noise Measurement Locations and Measurements

Site	Location	Measurement Period	Duration	Daytime Average L_{eq} (dBA) [1]
ST-1	Northwest corner of Lexington and N. Las Palmas	8:45 a.m.	15 min	59.4
ST-2	Southwest corner of N. McCadden and Lexington	9:00 a.m.	15 min	63.2
ST-3	Along N. Las Palmas to the south of the Project Site	9:30 a.m.	15 min	66.7

Source: Noise measurements taken by Kimley-Horn and Associates, Inc., August 8, 2022. See Appendix H for noise measurement results.

Sensitive Receptors

Noise exposure standards and guidelines for various types of land uses reflect the varying noise sensitivities associated with each of these uses. Residences, hospitals, schools, guest lodging, libraries, and churches are treated as the most sensitive to noise intrusion and therefore have more stringent noise exposure targets than do other uses, such as manufacturing or agricultural uses. Sensitive receptors near the Project Site are shown in **Table 23:** *Sensitive Receptors* along with the Noise Measurement Location that represents each sensitive receptor.

Table 23: Sensitive Receptors

Receptor Description	Distance[1] and Direction from the Project
Ariadne Getting Senior Housing *(represented by noise measurement ST-3)*	Adjacent to the south
Lifeworks Five Keys Charter School *(represented by noise measurement ST-2)*	110 feet to the southwest
Sound Stages *(represented by noise measurement ST-2)*	40 feet to the west
Youth Housing *(represented by noise measurement ST-2)*	160 feet to the southwest
Multi-Family Residential *(represented by noise measurement ST-1)*	100 feet to the north
Multi-Family Residential[2] *(represented by noise measurement ST-3)*	Adjacent to the south
Multi-Family Residential[2] *(represented by noise measurement ST-3)*	150 feet to the east

Source: Google Earth, 2022.

1. Distance measured from the property line of the Project Site to the nearest receptor property line.
2. Measured from the Project Site on the east side of N. Las Palmas Avenue.

Applicable Thresholds

Construction Noise

On-Site Construction. Noise due to construction is regulated under Section 41.40 of the LAMC, which prohibits construction noise between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, on Saturday before 8:00 A.M. and after 6:00 P.M., and at any time on Sunday or a national holiday.[137] In addition, Section 112.05 of the LAMC limits noise from construction equipment located within 500 feet of a residential zone to 75 dBA (between 7:00 A.M. and 10:00 P.M.), measured at a distance of 50 feet from the source, unless compliance with this limitation is technically infeasible.[138]

Off-Site Construction. In accordance with Section 114.02, the operation of motor driven vehicles upon any property within the City that causes the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than 5 dBA is considered a noise violation.

Operational Noise

On-Site Operations. With respect to on-site operational noise, the significance criteria used in the noise analysis is an increase in the ambient noise level of 5 dBA (hourly L_{eq}) at the noise-sensitive uses, in accordance with the City of Los Angeles CEQA Thresholds Guide (Noise Regulations).[139]

Off-Site Operations. The Noise Regulations do not apply to off-site traffic (i.e., vehicles traveling on public roadways). Therefore, the City has determined to assess the significance of the Project's off-site traffic noise based on whether the Project creates, or contributes to, an increase in the ambient noise level of 3 dBA in CNEL if the noise levels fall within the "normally unacceptable" or "clearly unacceptable" category, as specified in the City's Noise Element, or an increase of 5 dBA in CNEL if the noise levels fall within the "conditionally acceptable" or "normally acceptable" category at noise-sensitive uses.

Composite Operational Noise. In addition, the City has determined to assess the significance of the Project's composite noise levels (on-site and off-site sources) based on whether the Project's composite noise levels create an increase in the ambient noise level of 3 dBA or 5 dBA in CNEL (depending on where in the acceptable/unacceptable categories the noise levels fall) at noise-sensitive uses.

Vibration

Structural Damage Heavy construction equipment (e.g., a large bulldozer) would generate a vibration level of up to 0.089 inch/second Peak Particle Velocity (PPV) at a distance of 50 feet from the equipment.[140] With respect to potential building damage, FTA provides potential building damage criteria varies from 0.12 PPV (inch/second) for buildings that are extremely susceptible to vibration to 0.50 PPV (inch/second)

[137] Los Angeles Municipal Code, Section 41.40, https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-128777#JD_41.40
[138] In accordance with the City of Los Angeles Noise Regulations (Los Angeles Municipal Code, Section 112.05), "technically infeasible" means that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment.
[139] City of Los Angeles, L.A. CEQA Thresholds Guide, 2006
[140] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 7-4, www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

for reinforced-concrete, steel or timber buildings.[141] There is one historic building located on the east side of N. Las Palmas. This evaluation uses the FTA architectural damage criterion for continuous vibrations of 0.12 in/sec for this historic building (buildings extremely susceptible to vibration damage) and 0.2 in/sec peak particle velocity (PPV) at non-engineered timber and masonry buildings for all other adjacent structures.

Human Annoyance. In accordance with FTA guidance for human annoyance, a threshold of 0.04 in/sec PPV is utilized in this analysis.[142]

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?

Less than Significant

Construction

On-Site Construction Noise

On the west side of N. Las Palmas Avenue, the Project proposes to construct and operate a creative office building with a three-level subterranean garage in place of the existing surface parking lot located at 1139-1149 N. Las Palmas Avenue and to remodel and expand the existing building at 1155 N. Las Palmas. On the east of N. Las Palmas Avenue, the Project proposes to retain the four existing buildings located 1128 to 1146 N. Las Palmas Avenue with only minor interior changes that would not require the use of heavy-duty equipment such as forklifts or excavators, but would not alter or modify the existing structures or change existing uses. Any noise associated with future interior renovations would not result in substantial levels of construction noise. Therefore, the following construction noise analysis is limited to the portion of the Project Site located on the west side of N. Las Palmas Avenue.

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation). Noise generated by construction equipment, including earth movers and material handlers, can reach high levels. During construction, exterior noise levels could affect noise-sensitive uses near the construction site. Construction activities would include demolition, excavation, and grading, building construction, architectural coating, and exterior renovations. Noise levels associated with individual construction equipment to be used during Project construction and renovation are listed in **Table 24**: *Project Construction Equipment Noise Levels*.[143]

It should be noted that the values shown in **Table 24** are for the equipment when operating at full power. Construction noise was calculated accounting for each piece of equipment's usage factor, or the fraction of time that the equipment would be in use at full power over a specific period of time.[144] Other primary

[141] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 7-5, www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

[142] Ibid

143 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

144 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

sources of acoustical disturbance may include random incidents, which would last less than one minute (such as dropping of materials or the hydraulic movement of machinery lifts). It should also be noted that due to the constraints of the Project Site and standard construction practices, only a limited amount of equipment can operate on the Project Site at a particular time. Following the FTA's methodology for quantitative construction noise assessments, construction noise was predicted at the nearest noise-sensitive receptors consistent with the Federal Highway Administration's (FHWA's) Roadway Construction Noise Model (RCNM) and the methodologies in the FTA *Transit Noise and Vibration Impact Assessment Manual*.[145] Following FTA methodology, when calculating construction noise, all equipment is assumed to operate at the center of the Project Site, as equipment would operate throughout the Project Site and not at a fixed location for extended periods of time.[146] Therefore, the distance used in the RCNM model was measured from the center of the Project construction area.

Table 24: Project Construction Equipment Noise Levels

Construction Phase	Equipment	Typical Noise Level (dBA L_{max}) at 50 feet from Source	Usage Factor (%)
Demolition	Backhoe	78	40
Foundation/Concrete Pour A*	Pump	81	50
	Backhoe	78	40
	Forklift	61	40
Foundation/Concrete Pour B*	Backhoe	78	40
	Crane	81	16
	Forklift	61	40
Grading/Excavation	Excavator	81	40
	Backhoe	78	40
	Front End Loader	79	40
	Dump Truck	77	40
Building Construction A*	Crane	81	16
	Forklift	61	40
	Backhoe	78	40
Building Construction B*	Crane	81	16
	Air Compressor	78	40
	Forklift	61	40
Building Construction C*	Pump	81	50
Architectural Coating	Air Compressor	78	40
	Scissor/Boom Lift	75	20

Source: Federal Highway Association, Roadway Construction Noise Model, User Guide 2005, Source for Forklift Noise level: Warehouse & Forklift Workplace Noise Levels, The Main Noise Exposed SEG – Forklift Drivers, https://www.noisetesting.info/blog/warehouse-forklift-workplace-noise-levels/, Accessed December 2022.

* Noise levels were predicted for multiple concrete pouring and building construction scenarios due to days where differing equipment mixes would occur (e.g., instances where certain types of equipment such as cranes and concrete pumps would not be operated at the same time).

Table 25: *Project Construction Noise Levels,* shows the estimated maximum exterior construction noise levels at the nearest receptors to the Project Site.[147] See **Appendix H** for predicted construction noise for each individual construction phase.

[145] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.
[146] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.
[147] For predicted construction noise levels for all construction phases, see **Appendix H**.

Table 25: Project Construction Noise Levels

Receptor	Maximum Noise Level at Receptor Property Line (L_{eq})[1, 2]	Noise Threshold at 50 feet (dBA L_{eq}) [2]	Exceeded?
Ariadne Getty Sr Housing (S)	74.8	75	No
Lifeworks Five Keys Charter School	54.4		No
Sound Stages	68.8		No
Youth Housing	64.7		No
Multifamily Residential (N)	63.8		No
Multifamily Residential (S)	65.5		No
Multifamily Residential (E)	61.3		No

1. Per the methodology described in the FTA Noise and Vibration Manual (September 2018), distance is measured from the property line of the receptor to the center of the Project construction site (the portion of the Project Site on the west side of Las Palmas Avenue).
2. Section 112.05 of the LAMC sets a maximum noise level for each piece of construction equipment of 75 dBA at a distance of 50 feet when operated within 500 feet of a residential zone. This analysis conservatively assumes that multiple pieces of equipment would operate simultaneously. Therefore, the noise levels from the center of the Project Site to the property lines of the nearest sensitive receptors have been calculated.

Source: Federal Highway Administration, *Roadway Construction Noise Model,* 2006. Refer to Appendix H for noise modeling results for each construction phase.

As shown in **Table 25,** Project construction noise would not exceed the LAMC Section 112.05 significance criterion of 75 dBA L_{eq}. In addition, construction-related noise would be temporary and would not result in a permanent increase in ambient noise levels in the area. Construction activities would also be prohibited between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday and 6:00 p.m. to 8:00 a.m. on Saturdays, and at any time on Sunday. The City's permitted hours of construction are required in recognition that construction activities undertaken during daytime hours are a typical part of living in an urban environment and do not cause a significant impact. For all of these reasons, the Project would not result in the generation of a substantial temporary 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 during construction. Construction noise impacts would be less than significant, and no mitigation measures are required.

Off-Site Construction Noise

In addition to on-site construction noise, the Project would generate mobile source noise from delivery/ haul trucks and construction workers traveling to and from the Project Site during the Project's construction. According to the Transportation Assessment prepared by Kimley-Horn in December 2022, haul trucks would travel to and from the Project Site using N. Las Palmas and Santa Monica Boulevard.[148] Construction trucks and construction workers are expected to arrive at the Project Site before construction starts and leave when construction ends, and thus, would not overlap with the Project's construction equipment. In addition, construction workers would come from various directions to the Project Site. According to modeling assumptions included in the air quality and greenhouse gas assessment (see **Appendix A** of this MND), there would be up to 102 daily haul truck trips accessing the

[148] Kimley-Horn, 1151 N. Las Palmas Transportation Assessment, December 2022

Project Site during the grading/excavation phase and 10 employee trips. The estimated noise level due to grading trips plus existing traffic along N. Las Palmas Avenue and Santa Monica Boulevard would be 61.7 dBA CNEL and 71.3 dBA CNEL, respectively. When compared to the existing traffic noise levels of 60.6 dBA CNEL along N. Las Palmas and 71.2 dBA CNEL along Santa Monica Boulevard east of N. Las Palmas, the Project plus existing traffic would result in increases of 1.1 dBA CNEL and 0.1 dBA CNEL along N. Las Palmas and Santa Monica Boulevard, respectively. These increases in traffic noise would be below the 5-dBA significance criterion. The Project would not result in the generation of a substantial temporary 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 during construction. Therefore, the Project's potential off-site construction traffic noise impacts would be less than significant, and no mitigation measures are required.

Operations

On the west side of N. Las Palmas Avenue, the Project proposes to construct and operate a creative office building with a three-level subterranean garage in place of the existing surface parking lot and to renovate an existing building, expand its ground-floor by 695 square feet and change its warehouse use to office and retail use. The Project also proposes to retain the buildings located on the east of N. Las Palmas and would not alter or modify the existing structures or change existing uses. Therefore, the following operational noise analysis is limited to the portion of the Project Site located on the west side of N. Las Palmas.

The primary noise sources associated with the proposed Project would include parking/vehicle access and trash/recycling pickup, open space/decks and mechanical equipment.

<u>On-Site Parking/Vehicle Access and Trash/Recycling Pickup</u>

All parking associated with the Project would be enclosed within the Project building and/or be located on subterranean levels and, as such, would be completely shielded from sensitive receptors. Similarly, trash/recycling pick-up would occur within appropriate parking levels and noise generated by their activities would also be shielded from sensitive receptors. Therefore, typical sound levels from parking lot activities (e.g., a car door slamming, engine starting up, and car pass-bys) and trash/recycling pick up would be shielded from nearby receptors. Noise levels generated by Project parking, vehicle access, and trash/recycling pickup would not result in the generation of a substantial 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. Impacts would be less than significant, and no mitigation measures are required.

<u>On-Site Mechanical Equipment Noise</u>

The Project would include rooftop mechanical equipment that would be shielded by architectural features of the building. Mechanical equipment (e.g., HVAC equipment) typically generates noise levels of approximately 52 dBA at 50 feet.[149] Pursuant to LAMC Section 112.02 (Air Conditioning, Refrigeration, Heating, Pumping, Filtering Equipment), the operation of any air conditioning, refrigeration, or heating

[149] Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, Noise Navigator Sound Level Database with Over 1700 Measurement Values, July 6, 2010

equipment shall not create any noise which would cause the noise level of another occupied property to exceed the ambient noise level by more than 5 dBA. Rooftop mechanical equipment would be positioned as close as 75 feet from the senior housing located to the south of the Project Site, and at greater distances on the north building from its nearest receptor to the north of Lexington Avenue. At 75 feet away, mechanical equipment noise would attenuate to 48.5 dBA. Existing ambient noise levels at the nearest noise-sensitive land use was measured at 66.7 dBA Leq (see **Table 26:** *Mechanical Noise Levels*). Therefore, mechanical equipment noise levels would not increase ambient noise levels beyond the acceptable levels (5 dBA over ambient). Project mechanical equipment would not result in the generation of a substantial 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. Therefore, the proposed Project would result in a less than significant noise impacts related to the operation of on-site mechanical equipment and no mitigation measures are required.

Table 26: Mechanical Noise Levels

Receptor	Distance to Receptor (feet) [1]	Level at Receptor (dBA)[2]	Ambient Level (dBA)[3]	Combined Noise at Receptor (dBA)	Incremental Increase (dBA)	Incremental Increase Threshold (dBA)	Significant?
Ariadne Getty Sr Housing (S)	75	48.5	66.7	66.8	0.1	5.0	**No**
Lifeworks Five Keys Charter School (W)	180	40.9	63.2	63.2	0.0	5.0	**No**
Sound Stages (W)	100	46.0	63.2	63.3	0.1	5.0	**No**
Youth Housing (W)	235	38.6	63.2	63.2	0.0	5.0	**No**
Multifamily Residential (N)	185	40.6	59.4	59.5	0.1	5.0	**No**
Multifamily Residential (S)	200	40.0	66.7	66.7	0.0	5.0	**No**
Multifamily Residential (E)	250	38.0	66.7	66.7	0.0	5.0	**No**

1. *Distance estimated using location of rooftop equipment as indicated on Roof Plan.*
2. *Distance attenuation calculated assuming reference noise level of 52 dBA Leq at 50 feet: Source for reference level: Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, Noise Navigator Sound Level Database with Over 1700 Measurement Values, July 6, 2010.*
3. *See Table 3 and Table 4 for representative ambient noise levels.*

Open Space/Decks

The Project would include several outdoor terraces for occupants in the offices. Per Project Design Features (PDF Noise-1), no amplified music would be allowed in any of the outdoor spaces and the terraces are designed so that users would be dispersed throughout the outdoor areas and would not create a concentrated noise source. Noise from female adults and male adults talking at a raised level is approximately 63 dBA and 65 dBA, respectively, at a distance of 3 feet.[150] For this analysis, it is assumed that each outdoor space would be at full capacity and that half of the visitors would be male and half female. Of the adults, half would be talking simultaneously (assuming approximately half of the occupants talking and the other half listening). According to the California Fire Code Section 1004, Table 1004.5,

[150] American Journal of Audiology Vol.7 21-25 October 1998. doi:10.1044/1059-0889(1998/012).

Maximum Floor Area Allowances per Occupant, the occupancy load for business areas is 150 square feet per occupant.

The Project would provide both covered and uncovered open space areas for a total of 22,056 square feet of private open space.

- Deck: An outdoor deck would be located on the northern side of the new building, open to the north. The east, south, and west sides of the deck would be shielded by the building itself. As such, deck noise was calculated for the residential receptors to the north only.

- Western Façade: Three outdoor balcony areas would be located on the west façade of the building, one on each floor. Each of these balconies would not include sufficient space for large gatherings. Receptors to the west and northwest would have direct line of sight to these balconies. The receptors to the north, east and southeast would be shielded from noise generated on the west side of the new building. Although the receptors to the south would also be shielded, noise generated at these balconies has been calculated as a conservative measure.

- Eastern Façade: Two outdoor balcony areas would be located on the east façade of the building, on the second and third floors. Each of these balconies would not include sufficient space for large gatherings. Receptors to the northeast and southeast would have direct line of sight of these balconies The receptors to the west would be shielded from noise generated on the east side of the new building. Although the receptors to the east and south would also be shielded, noise generated at these balconies has been calculated as a conservative measure.

- Retail courtyard: A retail courtyard would be located along Las Palmas Avenue to the north of the new building. The receptors to the west, south, and east would be shielded from noise generated at the courtyard by existing buildings. However, receptors to the northeast would have direct line of sight of this space.

Open space noise has been calculated for the total amount of private open space and attenuated based on the distance of each receptor with line of sight to at least one space to the boundary of the open space area. As indicated in **Table 27**: *Outdoor Open Space Noise Levels*, noise levels from outdoor open spaces would not increase ambient noise levels beyond the acceptable levels (5 dBA over ambient pursuant to the City's Noise Regulations). Project open space areas would not result in the generation of a substantial 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. Therefore, the Project would result in a less than significant impact due to noise from outdoor open space and no mitigation measures are required.

Table 27: Outdoor Open Space Noise Levels

Receptor	Distance to Receptor (feet) [1]	Combined Open Space Level at Receptor (dBA)	Ambient Level (dBA)[2]	Combined Noise at Receptor (dBA)	Incremental Increase (dBA)	Incremental Increase Threshold (dBA)	Significant?
Ariadne Getty Sr Housing (S)	25	48.3	66.7	66.8	0.1	5.0	**No**
Lifeworks Five Keys Charter School (W)	120	32.5	63.2	63.2	0.0	5.0	**No**
Sound Stages (W)	50	40.1	63.2	63.2	0.0	5.0	**No**
Youth Housing (W)	180	29.0	63.2	63.2	0.0	5.0	**No**
Multifamily Residential (N)	150 - 200	38.1	59.4	59.4	0.0	5.0	**No**
Multifamily Residential (S)	130	30.0	66.7	66.7	0.0	5.0	**No**
Multifamily Residential (E)	200	26.3	66.7	66.7	0.0	5.0	**No**

Distance measured from open space boundary to receptor property line.
See Table 3 and Table 4 for representative ambient noise levels.

Off-Site Traffic Noise

Implementation of the Project would generate increased traffic volumes along nearby roadway segments.

According to the Transportation Assessment prepared by Kimley-Horn (December 2, 2022), the proposed Project would generate 925 additional daily trips that would result in noise increases on Project Site area roadways. Traffic noise levels for roadways primarily affected by the Project were calculated using the FHWA's Highway Noise Prediction Model (FHWA-RD-77-108). Traffic noise modeling was conducted for conditions with and without the Project, based on traffic volumes from the Transportation Assessment. As shown in **Table 28**: *Existing and Project Traffic Noise Levels*, Existing Plus Project traffic-generated noise levels on Project Site area roadways would range between 61.3 dBA CNEL and 71.2 dBA CNEL at 100 feet from the roadway centerline, and the Project would result in a maximum increase of 0.7 dBA CNEL along N. Las Palmas Avenue. Increases in traffic noise would not result in increases beyond acceptable levels (see Thresholds section above). Therefore, impacts would be less than significant.

Table 28: Existing and Project Traffic Noise Levels

Roadway Segment	Existing		Existing Plus Project		Project Change from Existing Conditions	Significant Impact?
	ADT	dBA CNEL[1]	ADT	dBA CNEL[1]		
Santa Monica Boulevard						
Between Highland and N. Las Palmas	47,083	71.1	47,379	71.1	0.0	**No**
Between N. Las Palmas and Seward	47,726	71.2	47,976	71.2	0.0	**No**
N. Las Palmas						

Table 28: Existing and Project Traffic Noise Levels

Roadway Segment	Existing		Existing Plus Project		Project Change from Existing Conditions	Significant Impact?
	ADT	dBA CNEL[1]	ADT	dBA CNEL[1]		
Between Lexington and Santa Monica	5,733	60.6	6,658	61.3	0.7	**No**

ADT = average daily trips; dBA = A-weighted decibels; CNEL= Community Equivalent Noise Level
Traffic noise levels are at 100 feet from the roadway centerline.
Source: Based on traffic data provided by Kimley-Horn and Associates, Inc., December 2022.

Composite Noise

An evaluation of the Project's composite noise levels, including all Project-related noise sources plus the existing ambient level, was conducted to identify the potential maximum Project-related noise level increase that may occur at noise-sensitive receptor locations. The overall sound environment of the areas surrounding the Project Site would include contributions from each on-site and off-site noise source associated with the operation of the Project. On-site noise sources associated with the Project would include the use of mechanical equipment and outdoor uses. Off-site Project noise sources include on-road traffic. **Table 29:** *Composite Noise Levels*, presents the estimated composite noise from Project-related noise sources in terms of CNEL at noise sensitive receptors. As reported in **Table 29**, the Project would result in a maximum increase of 0.7 dBA CNEL at the residential use located to the north of the Project Site. Composite Project noise levels would be below the 5 dBA CNEL significance threshold (applicable to noise levels less than 70 dBA CNEL at residential uses). Composite operational noise levels would not result in the generation of a substantial 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. Therefore, the composite noise level impacts due to Project operation would be less than significant, and no mitigation measures are required.

The Project incorporates the following Project Design Feature (PDF), PDF NOISE-1 (detailed below). PDF NOISE-1 prohibits the use of amplified sound systems in outdoor spaces.

PDF NOISE-1 **Amplified Sound Systems.** Amplified sound systems would not be installed or used at any of the outdoor spaces.

Table 29: Composite Noise Levels

Receptor	Mechanical Equipment (dBA CNEL) [1]	Open Space (dBA CNEL) [1]	Project Increment Off-Site Traffic (dBA CNEL)	Combined Project Noise at Receptor (dBA CNEL)	Ambient Level (dBA CNEL)[2]	Combined Project + Ambient Noise at Receptor (dBA CNEL)	Incremental Increase (dBA)	Incremental Increase Threshold (dBA)	Significant ?
Ariadne Getty Sr Housing (S)	55.1	51.3	53.0	58.2	68.9	69.3	0.4	5.0	**No**
Lifeworks Five Keys Charter School (W)	47.5	35.4	53.0	54.2	65.6	65.9	0.3	5.0	**No**
Sound Stages (W)	52.6	43.0	53.0	56.1	65.6	66.1	0.5	5.0	**No**
Youth Housing (W)	45.2	31.9	53.0	53.7	65.6	65.9	0.3	5.0	**No**
Multifamily Residential (N)	47.3	41.0	53.0	54.3	61.8	62.5	0.7	5.0	**No**
Multifamily Residential (S)	46.6	33.0	53.0	54.0	68.9	69.0	0.1	5.0	**No**
Multifamily Residential (E)	44.7	29.2	53.0	53.6	68.9	69.0	0.1	5.0	**No**

1. Mechanical equipment assumed to operate 24 hours a day. Open spaces assumed to operate 7:00 a.m. to 10:00 p.m.
2. See **Appendix H** for ambient CNEL.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Construction

Less than Significant

On-Site Construction Vibration

Increases in ground-borne vibration levels attributable to the Project would be primarily associated with short-term construction-related activities. Project construction would have the potential to result in varying degrees of temporary ground-borne vibration, depending on the specific construction equipment used and the operations involved.

The FTA has published standard vibration velocities for construction equipment operations. In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.2 in/sec) appears to be conservative. The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. For example, for a building that is constructed with reinforced concrete with no plaster, the FTA guidelines show that a vibration level of up to 0.50 in/sec is considered safe and would not result in any construction vibration damage and a vibration level of 0.04 in/sec is distinctly perceptible (see **Table 21**).[151]

Receptors susceptible to building damage include all adjacent structures, located at approximately 10 feet from the Project Site. In addition, one historic building is located on the east side of N. Las Palmas. Receptors susceptible to human annoyance include residential receptors located at approximately 10 feet from the Project Site. This evaluation uses the FTA architectural damage criterion for continuous vibrations of 0.12 in/sec for historic buildings (buildings extremely susceptible to vibration damage) and 0.2 in/sec peak particle velocity (PPV) at non-engineered timber and masonry buildings and human annoyance criterion of 0.04 in/sec PPV in accordance with FTA guidance.[152]

Table 30: *Typical Construction Equipment Vibration Levels* lists the reference vibration levels for typical construction equipment (measured at 25 feet). The ground-borne vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. As indicated in **Table 30**, based on FTA data, vibration velocities from typical heavy construction equipment that would be used during Project construction range from 0.003 to 0.089 in/sec PPV at 25 feet from the source of activity. Due to physical constraints of the Project Site and the required construction activity, it is assumed that small bulldozers/tractors would be operated at a distance of approximately 10 feet and

[151] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

[152] Ibid

large bulldozers and loaded trucks would be used at approximately 50 from the adjacent senior housing use.

Table 30: Typical Construction Equipment Vibration Levels

Equipment	Reference Level PPV at 25 Feet (in/sec)	PPV at 10 Feet (in/sec)	PPV at 50 Feet (in/sec)
Large Bulldozer	0.089	N/A*	0.0315
Loaded Trucks	0.076	N/A*	0.0269
Small Bulldozer/Tractors	0.003	0.0119	0.0011
Structural Damage Threshold	**0.20**	**0.20**	**0.12**
Exceeds Thresholds?	--	**No**	**No**
Human Annoyance Threshold	--	**0.04**	**0.04**
Exceeds Thresholds?	--	**No**	**No**

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.
* Equipment not anticipated to be required at this distance.

As shown in **Table 30,** at these distances, construction equipment vibration velocities would be below the FTA's 0.20 and 0.12 in/sec PPV thresholds for structural damage and FTA's human annoyance threshold of 0.04 in/sec PPV. Impacts would be less than significant, and no mitigation measures are required.

Off-Site Construction Vibration

With regard to construction trucks, Project construction would involve truck travel along nearby roadways, generating vibration events with each passing truck. Due to the size constraints of the Project Site, it is assumed that one truck would be arriving/leaving the Project Site at a time. According to the FTA's Transit Noise and Vibration Impact Assessment, a truck rarely creates vibration levels that exceed 70 VdB (equivalent to 0.012 inches per second PPV) when they are on roadways.[153] Multiple trucks traveling along the roadway would increase the frequency of vibration events but would not affect the vibration velocity experienced by receptors. Therefore, vibration impacts associated with construction of the proposed Project would be less than significant and no mitigation measures are required.

Operation

With respect to vibration-generating activities, operation of the Project would primarily involve personal automobiles used by employees, clients, and visitors accessing the subterranean parking, and occasional trucks providing deliveries of supplies. Due to the rapid drop-off rate of ground-borne vibration and the short duration of the associated events, vehicular traffic-induced ground-borne vibration is rarely perceptible beyond the roadway right-of-way, and rarely results in vibration levels that cause damage to buildings in the vicinity. According to the FTA's Transit Noise and Vibration Impact Assessment, trucks rarely create vibration levels that exceed 70 VdB (equivalent to 0.012 inches per second PPV) when they are on roadways.[154] Therefore, operation of the Project would result in less than significant ground-borne vibration impacts, and no mitigation measures are required.

[153] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

[154] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

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

No Impact. The Project Site is located approximately 7.5 miles south of the Hollywood-Burbank Airport (2627 North Hollywood Way). However, as previously discussed in response to Section 4.9, the Project Site is not located within the Planning Boundary/Influence Area, including within the Airport Land Use Plan Noise Contour, which establishes the area susceptible to noise levels that would exceed the annoyance threshold for noise (defined as >65 CNEL for commercial airports such as the Hollywood-Burbank Airport) for the Hollywood-Burbank Airport[155] or any private or public airport.[156] Therefore, no impacts would occur.

Cumulative Impacts

Cumulative Construction Noise

The Project's construction activities would not result in a substantial temporary increase in ambient noise levels. Construction noise would be periodic and temporary noise impacts that would cease upon completion of construction activities. The Project would contribute to other proximate construction project noise impacts if construction activities were conducted concurrently. However, there are no related projects located within 500 feet of the Project Site that could be under construction at the same time as the Project. Moreover, based on the Project-level noise analysis above, the Project's construction-related noise impacts would be less than significant.

Moreover, construction activities at other planned and approved projects near the Project Site would be required to comply with applicable City rules related to noise and would take place during daytime hours on the days permitted by the applicable Municipal Code, and projects requiring discretionary City approvals would be required to evaluate construction noise impacts, comply with the City's standard conditions of approval, and implement mitigation, if necessary, to minimize noise impacts. Construction noise impacts are by nature localized. Based on the fact that noise dissipates as it travels away from its source, noise impacts would be limited to the Project Site and vicinity. Therefore, Project construction would not result in a cumulatively considerable contribution to significant cumulative impacts, assuming such a cumulative impact existed, and impacts in this regard are not cumulatively considerable.

Cumulative Operational Noise

Cumulative Off-Site Traffic Noise. Cumulative noise impacts describe how much noise levels are projected to increase over existing conditions with the development of the proposed Project and other foreseeable projects. Cumulative noise impacts generally occur as a result of increased traffic on local roadways due to buildout of the proposed Project and other projects in the vicinity. However, the Project would result in a minimal traffic noise increase (less than 1.0 dBA) along local roadways. Therefore, the proposed Project's contribution would not be cumulatively considerable.

[155] Los Angeles County, Airport Land Use Commission, Burbank/Glendale/Pasadena Airport, Airport Influence Area Map, May 13, 2003.

[156] Los Angeles County Airport Land Use Commission, Los Angeles County Airport Land Use Plan, Airport Influence Area figures, adopted December 19, 1991, revised December 4, 2004.

Cumulative Stationary Noise. Stationary noise sources of the Project would result in an incremental increase in non-transportation noise sources in the Project Site vicinity. However, as discussed above, operational noise caused by the Project would be less than significant. Similar to the Project, other planned and approved projects would be required to mitigate for stationary noise impacts at nearby sensitive receptors, if necessary. As stationary noise sources are generally localized, there is a limited potential for other projects to contribute to cumulative noise impacts.

No known past, present, or reasonably foreseeable projects would combine with the operational noise levels generated by the Project to increase noise levels above acceptable standards because each project must comply with applicable City regulations that limit operational noise. Therefore, the Project, together with other projects, would not create a significant cumulative impact, and even if there were such a significant cumulative impact, the Project would not make a cumulatively considerable contribution to significant cumulative operational noises.

Given that noise dissipates as it travels away from its source, operational noise impacts from on-site activities and other stationary sources would be limited to the Project Site and vicinity. Thus, cumulative operational noise impacts from related projects, in conjunction with Project specific noise impacts, would not be cumulatively significant.

4.14 POPULATION AND HOUSING

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

a) 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.

Construction

Construction of the Project would result in increased employment opportunities in the construction industry. However, it is not likely that construction workers would relocate their households as a result of their temporary employment associated with construction of the Project. The construction industry differs from other employment sectors in that many construction workers are highly specialized and move from job site to job site as dictated by the demand for their skills, and they remain at a job site for only the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Furthermore, it is likely that the construction workers employed for the construction of the Project would be taken from the labor pool currently residing in the Los Angeles metropolitan region that moves from project to project. Given the short duration of the work for each job, and the large size and mobility of the construction labor pool that can be drawn upon in the region, construction workers would not be expected to relocate their residences within this region or move from other regions into this region in response to the short-term Project-related construction employment opportunities and, therefore, no new permanent residents would be generated during construction of the Project.

Operation

Direct Growth

The Project does not propose the removal or the development of housing and would, therefore, not result in substantial or unplanned population growth as a result of the on-site generation or off-site replacement of housing. The Project would result in the construction of 81,682 square feet of new office space (80,987 in Building A and 695 square feet in Building B) and 135 square feet of new retail space. In addition, 5,498 square feet of existing manufacturing space in Building B would be converted to office space. **Table 31**: *Net Project Employment Generation*, details the estimated number of employees that

would be generated by operation of the Project based on employee generation rated provided by the City of Los Angeles VMT Calculator Documentation.

Table 31: Net Project Employment Generation

Land Use	Size	Employment Generation Rate[1]	Employment Generated
Existing Use to be Converted			
Manufacturing	5,498 sf	0.5 employees / 1,000 sf	3 employees
New/Converted Uses			
Office – New	80,987 sf	4 employees / 1,000 sf	324 employees
Office – Converted	6,058 sf	4 employees / 1,000 sf	24 employees
Retail	135 sf	2 employees / 1,000 sf	1 employee
Project Total			***349 employees***
Less Existing Use to be Converted			*3 employees*
Project Net Total			**346 employees**

sf = square feet

1 Source for generation rate: City of Los Angeles VMT Calculator Documentation, Version 1.3, LADOT, Los Angeles Department of Transportation and Los Angeles Department of City Planning, Table 1, Land Use and Trip Generation Base Assumptions, May 2020.

As shown in **Table 31**, the Project would be expected to generate a net increase of 346 employees at the Project Site. Growth forecasts prepared by SCAG contained in the 2020-2045 RTP/SCS indicate that employment within the City will increase from 1,848,300 jobs in 2016 to 2,135,900 jobs in 2045, an increase of 287,600 jobs. Representing 0.1 percent of this increase, the Project would be within local and regional employment projections. It is not anticipated that the increase in employment at the Project Site would result in substantial population growth as it is reasonable to expect that some of the new employees would be drawn from the existing local labor force within the City. Moreover, the Project Site and City are well-served by existing transit options, which would be readily available for out-of-area employees to use to commute to and from their jobs at the Project Site. Because the Project's employees would be accounted for in local and regional planning forecasts and would not result in an increase in the demand for additional housing, and because the Project Site is located in a highly developed area with transit options, the Project would not result in substantial or unplanned direct population growth.

Indirect Growth

The Project is located in a developed urbanized area and would not require the extension of roadways or other infrastructure (e.g., water facilities, sewer facilities, electricity transmission lines, natural gas lines, etc.) into undeveloped areas. As the Project would be supported by the existing urban infrastructure, the Project would not result in indirect unplanned population growth and impacts would be less than significant.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project Site is currently developed with manufacturing, office, and parking uses. The Project would not involve the demolition, removal, or change in use of any existing residential uses. As such, the Project would not displace substantial numbers of existing people or housing and the

construction of replacement housing elsewhere would not be required. Therefore, no impacts would occur, and no mitigation measures would be required.

Cumulative Impacts

The Project would not construct or displace residential units such that there would be no direct impacts to population and housing. While the Project would increase on-site employment, these increases would not be expected to cause a substantial number of new households to move to the Hollywood Community Plan area or to generate a demand for substantial new housing. Further, the Project Site is already developed with urban uses, and the Project would not extend infrastructure to currently unserved areas and would not induce substantial population growth. Thus, Project population and housing impacts would be less than significant. In addition, while the related projects could cumulatively increase population in the area, such increases would be expected to be within City and SCAG growth forecasts. The Project would contribute little if any to additional population growth in the area. Thus, the Project would not contribute considerably to cumulative population and housing impacts, and cumulative population and housing impacts would be less than significant.

4.15 PUBLIC SERVICES

ENVIRONMENTAL Issues	IMPACTS	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
PUBLIC SERVICES. Would the project:					
a) 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:					
i) Fire protection?		☐	☐	☒	☐
ii) Police protection?		☐	☐	☒	☐
iii) Schools?		☐	☐	☐	☒
iv) Parks?		☐	☐	☐	☒
v) Other public facilities?		☐	☐	☐	☒

a) 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:

i) Fire protection?

Less Than Significant Impact.

Fire protection and emergency medical services for the Project and the Project Site would be provided by LAFD. The LAFD's approximately 3,435 uniformed personnel and 381 civilian support staff provide fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service.[157] At any given time, there are approximately 1,018 uniformed firefighters on-duty at 106 fire stations across the LAFD's 469 square-mile jurisdiction.

The LAFD has five fire stations that would provide initial response to the Project Site, they include Fire Stations 27, 41, 82, 52 and 61.[158] **Table 32:** *LAFD Fire Stations Located in the Vicinity of the Project Site*,

[157] Los Angeles Fire Department, Department, Overview, Website, https://www.lafd.org/about/about-lafd/our-mission, accessed December 21, 2022.

[158] Los Angeles Fire Department, Inter-Departmental Correspondence, Dated November 17, 2022 provided in **Appendix I**.

provides information on the location, the approximate distance/direction from the Project Site, staffing and equipment and the average response time.[159] According the LAFD, based on these criteria (response distance from existing fire stations), fire protection to the Project Site would be considered adequate.[160]

Table 32: LAFD Fire Stations Located in the Vicinity of the Project Site

Fire Station[a]	Address[a]	Approximate Distance/Direction from Project Site	Average Operational Response Time[b]	Staff and Equipment
Fire Station 27	1327 North Cole Ave.	0.6 mile	7:01 (EMS) 6:18 (non EMS) 5:43 (Critical ALS) 5:16 (Structural Fire)	BLS Engine, BLS Light Force, Paramedic Rescue Ambulance, BLS Rescue Ambulance, Battalion Chief Staff: 16
Fire Station 41	1439 North Gardner St.	1.3 miles	7:41 (EMS) 7:56 (non EMS) 6:20 (Critical ALS) 6:24 (Structural Fire)	BLS Engines, Paramedic Rescue Ambulance Staff: 6
Fire Station 82	5769 Hollywood Blvd.	1.9 miles	7:17 (EMS) 6:54 (non EMS) 6:13 (Critical ALS) 5:07 (Structural Fire)	BLS Engines, Paramedic Rescue Ambulance Staff: 6
Fire Station 52	4957 Melrose Ave.	2.2 miles	6:47 (EMS) 6:25 (non EMS) 5:33 (Critical ALS) 5:03 (Structural Fire)	Assessment Engine and Paramedic Rescue Ambulance Staff: 6
Fire Station 61	5821 West 3rd St.	2.2 miles	7:31 (EMS) 7:08 (non EMS) 6:06 (Critical ALS) 5:50 (Structural Fire)	Light Force, Assessment Engine, Paramedic Rescue Ambulance, BLS Rescue Ambulance, Battalion EMS Supervisor Staff: 15

Structural Fire: The type of call reserved when the Los Angeles Police Department receives a report of a building or structure that is actively burning.
EMS = Emergency Medical Services; ALS = Advanced Life Support
Sources:
[a] From January to November 2022. LAFD, Find Your Station. https://www.lafd.org/fsla/stations-map.
[b] FIRESTATLA http://www.lafd.org/fsla/stations-map. Accessed December 21,2022

Construction

The Project would construct new office and retail uses and convert an existing manufacturing use to office use, and would not involve the construction or physical alteration of a fire station.

[159] https://www.lafd.org/fsla/stations-map. Accessed December 21, 2022
[160] Los Angeles Fire Department, Inter-Departmental Correspondence, Dated November 17, 2022, provided in Appendix I.

Typical of construction projects in general, construction activities associated with the Project may temporarily increase the demand for fire protection and emergency medical services, and may cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, covering and coatings, to heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. However, in compliance with the requirements of OSHA, all construction managers and personnel would be trained in fire prevention and emergency response. Furthermore, fire suppression equipment specific to construction would be maintained on the Project Site. As applicable, construction activities would be required to comply with the 2019 California Building Code (CBC), the California Fire Code (CFD), and Article 7: Fire Protection and Prevention (Fire Code) of Chapter V: Public Safety and Protection, of the LAMC.

During construction, during hoisting rebar and concrete pours, N. Las Palmas Avenue and N. McCadden Place would be intermittently disrupted. A covered pedestrian walkway would be provided as an alternative for pedestrians during construction and would also be addressed in the worksite traffic control plans. At times, the lane closest to the Project Site would have to be closed, and both travel lanes might need to be temporarily closed depending on the size of the cranes. Such intermittent travel lane closures may disrupt local traffic. However, In addition, the Project would implement a Construction Management Plan (PDF TRAF-4) that would minimize construction impacts. The Construction Management Plan would include a worksite traffic control plan that would be prepared, in accordance with applicable City guidelines, for any temporary closure of vehicle lanes or sidewalks and these plans would provide for safe and efficient movement for vehicular and pedestrian traffic. The Construction Management Plan would also include the number and location of flag men required during traffic rerouting and deliveries and would require the contractor to post construction notices/hotlines at several locations on the Project Site.

Parking closure across the property frontage would be requested to allow for ongoing construction access and possible staging, this impact would be less than significant with implementation of the Construction Management Plan.

Due to the limited duration of construction activities, the Project Site's proximity to five fire stations, implementation of a Construction Management Plan, and compliance with applicable codes, Project-related construction would not be expected to adversely impact firefighting and emergency services so as to necessitate a new or expanded fire station in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. Moreover, consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and potential impacts on public safety services are not an environmental impact that CEQA requires a project applicant to mitigate.

Therefore, construction impacts on fire protection and emergency medical services would be less than significant and no mitigation measures are required.

Operation

Operational activities associated with the Project could increase the demand for fire protection and emergency medical services. As discussed under Section 4.14. *Population and Housing*, the Project would

not include any residential uses and would result in a net increase of 346 employees at the Project Site. The new employees generated by the Project would be within local and regional employment projections.

The Project would also be required to comply with fire protection design standards, as necessary, per the California Building Code, California Fire Code, the LAMC, and the LAFD to ensure adequate fire protection. Key components of these regulatory requirements that would be implemented as part of the Project pursuant to LAFD review and guidance include the following:

- **Building Design:** Fire resistant doors and materials, as well as walkways, stairwell, and elevator systems (including emergency and fire control elevators) that meet code requirements.
- **Fire Safety Features:** Installation of automatic sprinkler systems, smoke detectors and appropriate signage and internal exit routes, if not already installed, to facilitate a building evacuation if necessary; as well as a fire alarm system, building emergency communication system and smoke control system.
- **Emergency Safety Provisions:** Implementation of an Emergency Plan in accordance with LAMC Section 57.33.19. The emergency plan would establish dedicated personnel and emergency procedures to assist the LAFD during an emergency incident (e.g., floor wardens, evacuation paths); establish a drill procedure to prepare for emergency incidents; establish an on-site emergency assistance center; and establish procedures to be followed during an emergency incident. Provision of on-site emergency equipment and emergency training for personnel to reduce impacts on the increased need for emergency medical services.
- **LAFD Access:** Access for LAFD apparatus and personnel to the Project Site in accordance with LAFD requirements, inclusive of standards regarding fire lane widths and weight capacities needed to support fire fighting vehicles, markings and on-site vehicle restrictions to ensure safe access.

The City of Los Angeles requires that plans for building construction, fire flow requirements, fire protection devices (e.g., sprinklers and alarms), fire hydrants and spacing, and fire access including ingress/egress, turning radii, driveway width, and grading be prepared for review and approval by the LAFD.

The Project Site is surrounded by urban development and is not adjacent to any wildlands. Therefore, no fuel modification for fire fuel management would be required, nor would the Project be subject to wildfire risk.

Another important component of ensuring fire protection services is the availability of adequate firefighting water flow. Fire flow requirements are closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazards.

Based on fire flow standards set forth in Section 57.507.3 of the LAMC, the Project Site falls within the industrial commercial category, which requires 6,000-9,000 gallons per minute (gpm) from four to six adjacent hydrants flowing simultaneously. This translates to 1,000-1500 gpm flowing from each hydrant and a minimum residual pressure of 20 pounds per square inch (psi). As provided in the *Las Palmas Utility Infrastructure Technical Report: Water,* prepared by KPFF in December 2022 located in **Appendix K**, fire hydrants near the Project would meet the 6,000 gpm and 20 psi minimum requirement.

The Project would incorporate a fire sprinkler suppression system to reduce or eliminate the demands on public hydrants, which system would be subject to Fire Department review and approval during the design and permitting of the Project. Based on Section 94.2020.0 of the LAMC that adopts by reference NFPA 14-2013 including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building would be 1,250 gpm. As noted, in the *Las Palmas Utility Infrastructure Technical Report: Water*, a LADWP Service Advisory Request (SAR) and LADWP "Information of Fire Flow Availability Request" (IFFAR) were submitted to LADWP to determine if the existing public water infrastructure could meet the demands of the Project. The SAR results show that 1,400 gpm can be delivered to the Project with a minimum residual pressure of 82 psi. Based on this information, the existing infrastructure can provide adequate water flow and pressure to the Project.

As indicated by the LAFD[161], based on a required fire-flow of 6,000-9,000 gpm., the first-due Engine Company should be within one mile, the first-due Truck Company within 1.5 mile(s). As indicated by the LAFD, one station is within one mile and two stations are within 1.5 miles satisfying the LAFD standard. As indicated by the LAFD162, at present, there are no immediate plans to increase Fire Department staffing or resources in those areas that would serve the Project.

The Project Site vicinity is well served by five nearby fire stations within close proximity to one another and the Project Site. These LAFD fire stations would provide fire protection and emergency medical services to the Project Site area and are dispatched based on availability and the nearest unit to a service call. The Project-related increase in traffic on surrounding roadways could potentially affect emergency response times in the area. However, a number of factors would serve to facilitate LAFD responses to emergency calls. Emergency responses are routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, by driving in lanes of opposing traffic, by the use of alternate routes, and by multiple station response.

The Project Site is located outside of hazardous/hillside areas. Because of the grid pattern of the local street system and the proximity to multiple freeways, each of the nearby fire stations has multiple routes available to respond to emergency calls at the Project Site.

With the Project's compliance with applicable regulatory requirements (i.e., building design, fire safety features, emergency safety provisions, LAFD access), the Project's ability to meet fire water supply needs, and its location close to several LAFD stations, and with its incorporation of a Construction Management Plan, the Project is not expected to result in a substantial increase in demand for additional fire protection services that would exceed the capability of the LAFD to serve the Project such that the construction of either new or expanded fire facilities would be required. Furthermore, the LAFD would review the Project and make recommendations, including any potential modifications to building plans, to reduce the risk of and susceptibility to the spread of fires, as determined by LAFD. LAFD also continues to monitor population growth and land development throughout the City and to identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possible station expansions or new station construction that may become necessary to achieve the desired level

[161] Los Angeles Fire Department, Inter-Departmental Correspondence, Dated November 17, 2022
[162] Los Angeles Fire Department, Inter-Departmental Correspondence, Dated November 17, 2022

of service. Through the City's regular budgeting efforts, LAFD's resource needs would be identified, and monies allocated according to the priorities at the time.

Based on the above, and with the Project's incorporation of project design feature PDF-TRAF-3, the Project would not create the need for the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility, to maintain service, and the potential for a physical impact associated with the construction of fire facilities is considered less than significant and no mitigation measures are required.

ii) Police protection?

Less than Significant Impact.

Police protection for the Project and the Project Site would be provided by the Los Angeles Police Department (LAPD).). The nearest LADP station to the Project Site is the Hollywood Community Police Station, which is located at 1358 N. Wilcox Avenue, approximately 0.4 miles from the Project Site.

The Hollywood Community Police Station serves the communities of Argyle, Cahuenga Pass, East Hollywood, Hobart, Hollywood, Hollywood Hills, Hollywood/La Brea, Little Armenia, Los Feliz, Melrose District, Mount Olympus, Sierra Vista, Spaulding Square, Sunset Strip, Thai Town, and Vine/Willoughby which spans 17.2 square miles.[163]

Construction

Since the daytime population generated at the Project Site during construction (i.e., construction workers) would be temporary in nature, construction of the Project would not generate a permanent population on the Project Site that would substantially increase the demand for police services. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. As such, the Project Applicant has incorporated into the Project PDF-PS-1, which requires the construction site to be fenced along the perimeter to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

Construction activities are expected to be primarily contained within the Project Site boundaries. During construction, during hoisting rebar and concrete pours, pedestrian and vehicular traffic along N. Las Palmas Avenue and N. McCadden Place would be intermittently disrupted. At times, the lane closest to the Project Site would have to be closed, and both travel lanes might need to be temporarily closed depending on the size of the cranes. Such intermittent travel lane closures may disrupt local traffic. However, the Project would incorporate a Construction Management Plan (PDF TRAF-4) that would minimize such construction impacts. The Construction Management Plan would include a worksite traffic control plan that would be prepared, in accordance with applicable City guidelines, for any temporary closure of vehicle lanes or sidewalks and these plans would provide for safe and efficient movement for pedestrian and vehicular traffic, as well as emergency vehicles. In addition, a covered pedestrian walkway would be provided as an alternative for pedestrians during construction. The Construction Management

[163] https://www.lapdonline.org/lapd-contact/west-bureau/hollywood-community-police-station/?zip=1151%20las%20palmas%20los%20angeles%20

Plan would also include the number and location of flag men required during traffic rerouting and deliveries and would require the contractor to post construction notices/hotlines at several locations on the Project Site.

Given the visibility of the Project Site from adjacent roadways and surrounding properties, existing police presence in the City of Los Angeles, maintained emergency access, and construction fencing discussed in PDF-PS-1, the Project's construction activities are not expected to increase demand on existing police services to an extent that a new police facility would be required. Therefore, the Project would have a less than significant temporary impact on police protection.

Operations

Operational activities associated with the Project could increase the demand for fire protection and emergency medical services. The Project would not include any residential uses and would result in a net increase of 346 employees at the Project Site. The new employees generated by the Project would be within local and regional employment projections. It is not anticipated that the increase in employment at the Project Site would result in substantial population growth, necessitating a high demand for police services.

As required by the City, the Project would include standard security measures such as adequate security lighting and keyed access to the creative office building including controlled access to door and parking facilities. In addition, the LAPD will require that the commanding officer of the Community Area be provided a diagram of the property showing access routes, and any additional information that might facilitate police response (PDF-PS-2). These preventative and proactive security measures would decrease the amount of service calls that LAPD would otherwise receive. In light of these features, it is anticipated that any increase in demand upon police protection services would be relatively low, and would not necessitate the construction of a new or expanded police station, the construction of which may cause significant environmental impacts.

Project Design Features

PDF-PS-1: A construction fence shall be constructed around the Project Site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

PDF-PS-2: Prior to the occupancy of the Project, the Applicant shall provide Hollywood Community Police Station with a diagram of each portion of the property, including access routes, and additional information to facilitate potential LAPD responses.

iii) Schools?

No Impact. A significant impact may occur if a proposed project includes substantial employment or population growth, which could generate demand for school facilities that exceeds the capacity of the school district(s) responsible for serving the Project Site. The Project would have less than significant impacts on schools because it would be subject California Government Code Section 65995, which allows Los Angeles Unified School District (LAUSD) to collect impact fees from developers of new residential developments. The Project does not include any housing and would not employ a significant number of

employees; therefore, it would not be expected to generate a significant number of school-aged children. Furthermore, pursuant to the California Government Code Section 65995/California Education Code Section 17620, mandatory payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, fully address any indirect impacts to schools as a result of the Project. Therefore, no impacts related to an increased demand for school facilities would be occur under the Project and no mitigation measures are required.

iv) Parks?

No Impact. A significant impact to parks may occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts.

The Project does not include any residential uses. The Project would not be open to the public; therefore, no open space requirements would apply to the Project. However, the Project would provide 22,056 square-feet of private open space for the proposed tenants of Building A as part of its design that is intended to promote worker well-being and enjoyment and attract/retain media-focused tenants in Hollywood. This private open space would include 13,245 square-feet of courtyard and seating areas on the ground floor, 3,244 square-feet of decks on the 2nd floor, and 5,567 square-feet of terrace and decks on the 3rd floor. Any associated increase in demand for off-site park services would be negligible, as most employees would likely visit parks near their homes. Therefore, no impacts related to an increased demand for park facilities would occur under the Project and no mitigation measures are required.

v) Other public facilities?

No Impact. A significant impact may occur if a project generates a demand for other public facilities (such as libraries) that exceeds the capacity available. The Project Site would be served by the John C. Fremont Branch Library, which is located at 6121 Melrose Ave , approximately 0.7-mile south of the Project Site.

The Project does not include any residential uses, and although it would generate a small number of jobs, any associated increase in demand for public facilities would be negligible. The Project is not expected to create a demand for library services as no new residential population would be generated, and most employees would likely visit libraries near their homes. As such, the Project is not expected to create substantial capacity or service problems that would require provision of new or physically altered facilities in order to maintain an acceptable level of service for libraries. Therefore, no impacts related to an increased demand for other public facilities, such as libraries, would occur under the Project and no mitigation measures are required.

Cumulative Impacts

Fire Protection Services

The related projects would cumulatively generate, in conjunction with the Project, the need for additional fire protection and emergency medical services from the LAFD. Although there would be cumulative demand on LAFD services, cumulative impacts on fire protection and medical services would be reduced through regulatory compliance and site-specific design and safety requirements, similar to the Project. All

related projects would be subject to review by the LAFD for compliance with Fire Code and Building Code regulations related to emergency response, emergency access, fire flow, and fire safety.

The protection of public safety is the first responsibility of local government, and local officials have an obligation to give priority to the provision of adequate public safety services which are typically financed through the City general funds. Through the City's regular budgeting efforts, LAFD's resource needs would be identified, and monies allocated according to the priorities at the time. The Project, as well as the related projects, would also generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of fire services, as deemed appropriate by the City.

Furthermore, project-by-project traffic mitigation, multiple fire station response, and system wide upgrades to improve response times, and other requirements imposed by the LAFD are expected to help support adequate response times. Through the process of compliance, the ability of the LAFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Due to the fact that there are five LAFD Stations within 2.2 miles of the Project Site, including Fire Station 27, which is approximately 0.6 mile away from the Project Site, the Project would not make a cumulatively considerable contribution to any cumulative impact related to the construction of new fire facilities.

Police Protection Services

The related projects would cumulatively generate, in conjunction with the Project, the need for additional police protection services from the LAPD. It is expected that the related projects (particularly those of a larger nature) would be subject to review by the LAPD on a project-by-project basis to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Many of the related projects would also be expected to provide on-site security, personnel, and/or design features for their residents and patrons per standard development practices for the given uses. In addition, like the Project, the related projects would also be expected to provide on-site security, personnel and/or design features for their residents and patrons. Each related project would be subject to the City of Los Angeles' routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented.

Furthermore, the protection of public safety is the first responsibility to local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City's General Funds. Accordingly, the need for additional police protection services as part of an unplanned police station at this time is not an environmental impact that the Project is required to mitigate. Through the process of compliance, the ability of the LAPD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Therefore, cumulative impacts would be less than significant.

Schools

Pursuant to Government Code Section 65995 the payment of developer fees under the provisions of SB 50 addresses the impacts of new development on school facilities serving that development. The Project does not include any housing and would not employ a significant number of employees; therefore, it

would not be expected to generate a significant number of school-aged children. Furthermore, pursuant to the California Government Code Section 65995/California Education Code Section 17620, mandatory payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, fully address any indirect impacts to schools as a result of the Project.

Accordingly, in compliance with SB 50, impacts on public schools from related projects would remain less than significant with payment of school impact fees. Furthermore, as the Project would also pay school impact fees and no residential uses would occur under the Project. Therefore, the Project would not contribute considerably to any cumulative impacts to schools or libraries, and cumulative school impacts would be less than significant

Parks

A significant impact to parks may occur if implementation of a Project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts.

The Project does not include any residential uses. The Project would not be open to the public; therefore, no open space requirements would apply to the Project. However, the Project would provide 22,056 square-feet of private open space for the proposed tenants of Building A as part of its design that is intended to promote worker well-being and enjoyment and attract/retain media-focused tenants in Hollywood. Any associated increase in demand for off-site park services would be negligible, as most employees would likely visit parks near their homes. The Project would meet its on-site demand for park and recreational facilities, and no substantial new demand for parks and recreational facilities would occur. Moreover, related projects requiring discretionary approvals would be subject to CEQA review by the City which would address, in part, parks and recreational facilities service demand, and the related projects. Furthermore, the related Projects would be required to comply with the parks and recreation requirements of the Quimby Act and LAMC (e.g., provision of parkland and/or payment of in-lieu fees), as applicable. Thus, the Project would not contribute considerably to cumulative parks and recreation impacts, and cumulative parks and recreation impacts would be less than significant.

Other Governmental Services

With respect to libraries, Project would not generate a direct residential population that could increase the demand for libraries. In addition, any indirect increase in the local residential population associated with the Project would be inconsequential. 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 enhanced library services, as deemed appropriate. Therefore, the Project would not contribute considerably to any cumulative impacts to libraries, and cumulative libraries impacts would be less than significant.

4.16 RECREATION

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

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

No 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 or recreational facilities. The Project would not be open to the public; therefore, no open space requirements would apply to the Project. However, the Project would provide 22,056 square-feet of private open space for the proposed tenants of Building A as part of its design that is intended to promote worker well-being and enjoyment and attract/retain media-focused tenants in Hollywood. This private open space would include 13,245 square-feet of courtyard and seating areas on the ground floor, 3,244 square-feet of decks on the 2nd floor, and 5,567 square-feet of terrace and decks on the 3rd floor. Any associated increase in demand for off-site park services would be negligible, as most employees would likely visit parks near their homes. 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 Therefore, no impact would occur.

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. As also discussed above, the Project does not include any residential uses and therefore would not result in any direct substantial population growth that would increase use of existing recreational facilities. Therefore, the Project would not necessitate construction of new recreational facilities. No Project impacts would occur, and no mitigation measures are required.

Cumulative Impacts

No Impact. As also discussed above, the Project does not include any residential uses and therefore would not result in any direct substantial population growth that would increase use of existing recreational

facilities. Therefore, the Project would not necessitate construction of new recreational facilities. No Project impacts would occur, and no mitigation measures are required.

4.17 TRANSPORTATION

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

This section assesses potential project impacts based on the *1151 N. Las Palmas Avenue Project Transportation Assessment* (Transportation Assessment or TA) prepared by Kimley-Horn dated May 2023, provided in Appendix J. The traffic study was prepared in accordance with the latest version of City of Los Angeles Department of Transportation (LADOT)'s Transportation Assessment Guidelines (TAG) (August 2022). The City's TAG are focused on transportation metrics that promote: the reduction of greenhouse gas emissions, the development of multimodal networks and access to diverse land uses, as well as safety, sustainability, and smart growth. In compliance with CEQA, the City's TAG identifies vehicle miles traveled (VMT) as the primary metric for evaluating a project's transportation impacts along with whether the project conflicts or is inconsistent with local plans and policies. A Memorandum of Understanding (MOU) which outlines all the traffic study assumptions was submitted to LADOT and approved on October 17, 2022, and is incorporated as a reference in the Transportation Assessment. The LADOT approved the transportation assessment and issued a signed assessment letter on May 9, 2023.

a) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant Impact. As discussed in the Transportation Assessment, The Project would not conflict with the relevant City plans, policies and programs and does not include any features that would preclude the City from completing and complying with these guiding documents and policy objectives.

Threshold T-1 of the TAG states that a project would result in an impact if it conflicts with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. The City aims to achieve an accessible and sustainable transportation system that meets the needs of all users. The City's adopted transportation-related plans and policies affirm that streets should be safe and convenient for all users of the transportation system, including pedestrians, bicyclists, motorists, public transit riders, disabled persons, senior citizens, children, and movers of commercial

goods. Thus, the transportation requirements for proposed developments should be consistent with the City's transportation goals and policies.

As discussed in the Transportation Assessment, the Project would be consistent with and would not impede the City's implementation of the Mobility Plan 2035, would be consistent with the policies of the Hollywood Community Plan, and the Project has been found to be consistent with the Connect SoCal, the SCAG RTP/SCS. Furthermore, the Project would comply with existing applicable City ordinances (e.g., the City's existing transportation demand management (TDM) Ordinance in LAMC Section 12.26.J) and other requirements pursuant to the LAMC furthermore, the Project would not add new access on N. Las Palmas Avenue and therefore would be consistent with and would not conflict with the implementation of future Vision Zero projects in the public right-of-way. Pedestrians and bicyclists would be able to access the Project Site via existing sidewalks around the perimeter of the Project Site. Bicycle parking facilities would be provided on-site as part of the Project. The Project's access locations would be designed in compliance with City standards and safety requirements to be provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls.

Thus, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. Therefore, Project impacts related to Threshold T-1 would be less than significant.

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

Less Than Significant Impact with Mitigation Incorporated. The State of California Governor's Office of Planning and Research (OPR) issued proposed updates to the CEQA guidelines in November 2017 and an accompanying technical advisory guidance in April 2018 (OPR Technical Advisory) that amends the Appendix G (of the CEQA Guidelines) question for transportation impacts to delete reference to vehicle delay and level of service and instead refer to Section 15064.3, subdivision (b)(1) of the CEQA Guidelines asking if the project will result in a substantial increase in vehicle miles traveled (VMT). Section 15064.3, subdivision (b)(1) states the following:

Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact.

Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant transportation impact. Comprehensive updates to the CEQA Guidelines were certified and adopted by the California Natural Resources Agency in December 2018. Accordingly, the City adopted significance criteria for transportation impacts based on VMT for land use projects and plans in accordance with the amended Appendix G (of the CEQA Guidelines) question:

Threshold T-2.1: For a land use project, would the project conflict or be inconsistent with CEQA guidelines Section 15064.3, subdivision (b)(1)?

For land use projects, the intent of this threshold is to assess whether a land use project or plan causes substantial vehicle miles traveled. The City has developed the screening and impact criteria (discussed below) to address this question. The criteria below are based on the OPR technical advisory but reflects local considerations.

If the project requires a discretionary action, and the answer is yes to any of the following questions, further analysis will be required to assess whether the proposed project would cause substantial vehicle miles traveled:

- Would the land use project generate a net increase of 250 or more daily vehicle trips?
- Would the project generate a net increase in daily VMT?
- If the project includes retail uses, does the portion of the project that contain retail uses exceed a net 50,000 square feet?
- Would the Project or Plan located within a one-half mile of a fixed-rail or fixed-guideway transit station replace an existing number of residential units with a smaller number of residential units?

The City's VMT impact criteria for development projects is specified in the TAG. Per the criteria, a development project would have a potential significant impact if the project meets one or more of the following:

- For residential projects, the project would generate household VMT per capita exceeding 15% below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located. (See **Table 33**: *LADOT VMT Impact Criteria (15% Below APC Average*)
- For office projects, the project would generate work VMT per employee exceeding 15% below the existing average work VMT per employee for the APC in which the project is located. (See **Table 33**: *LADOT VMT Impact Criteria (15% Below APC Average*)
- For regional serving projects including retail projects, entertainment projects, and/or event centers, the project would result in a net increase in VMT.
- For other land use types where the threshold is not further specified below, measure VMT impacts for the work trip element using the criteria for office projects above.

Table 33: LADOT VMT Impact Criteria (15% Below APC Average)

Area Planning Commission (APC)	Daily Household VMT Per Capita	Daily Work VMT Per Employee
Central*	6.0	7.6
East LA	7.2	12.7
Harbor	9.2	12.3
North Valley	9.2	15.0
South LA	6.0	11.6
South Valley	9.4	11.6
West LA	7.4	11.1
*Project Source: LADOT TAG		APC

Because the Project is generating more than the City's 250 daily vehicle trips threshold, an analysis was conducted to assess whether the Project would cause substantial vehicle miles traveled.

Assumptions

Based on the Project's proposed land use information, only the office land use was analyzed. Trips generated by the four existing office buildings located at 1128 to 1148 N. Las Palmas Avenue were not included in the trip generation calculation because the land-use is not changing, and it is not expected that these building would generate new, additional trips after the Project is constructed. Trip credits for the existing land use (manufacturing) building that would be displaced were applied to the Project. The City of Los Angeles VMT calculator, as outlined in the TAG, was used to determine the Project's VMT. The VMT estimation tool generates VMT estimates in a manner that is consistent with OPR's guidelines.

The Project's proposed retail area is presumed to have a less than significant VMT impact per the City's TAG. Per the TAG, retail uses in mixed-use projects can be removed from the analysis if the use falls under 50,000 square feet. The Project's proposed retail area of 135 square feet would be local serving, resulting in a less than significant VMT impact and no further VMT analysis is required.

As the Project Site is located within the Central APC, and the Project proposes only non-residential uses, the VMT impact criteria applicable to the Project is 7.6 daily work VMT per employee, as shown in Table 31 above.

VMT Analysis

VMT was calculated for the Project's proposed office land use using the City's VMT calculator, in compliance with the TAG. The Project would include project design features that would reduce trips and VMT through TDM strategies and are included in the VMT analysis for the Project. These include PDF TRAF-1 Promotions and Marketing, PDF TRAF-2 Reduced Parking Supply, and PDF TRAF-3 Bicycle Parking and Amenities. The effectiveness of the TDMs to reduce vehicle trips and VMT is based on research from the California Air Pollution Control Officers Association (CAPCOA). The Project VMT is 8.8 daily work VMT per employee with the PDFs which exceeds the threshold of 7.6 daily work VMT per employee. To reduce the Project VMT to below the threshold, the Project would implement a ridesharing program (MM TRAF-1).

Table 34: *Vehicle Miles Traveled (VMT) by Land Use and Scenario* summarizes VMT per employee for the proposed Project and compares it to the City thresholds for the Central APC.

Table 34: Vehicle Miles Traveled (VMT) by Land Use and Scenario

Scenario - Central APC	VMT/Employee (Office)
Proposed Project	9.30
Project Feature: Promotions and Marketing (100% Eligible)	- 0.37
Project Feature: Reduced Parking Supply	- 0.09
Project Feature: Include Bike Parking Per LAMC	- 0.09
Project VMT	8.8

Over City Threshold (7.60 VMT/Employee)?	Yes
Mitigation Measure	
Rideshare Program (100% Eligible)	- 1.40
Project VMT with Mitigation	**7.4**
Over City Threshold (7.60 VMT/Employee)?	**No**

As shown in **Table 34**, the office land use would result in an estimated VMT per employee of 7.4, which would be below the City threshold for the Central APC. Regarding the City's other VMT impact criteria, Project's retail land use (135 square feet) would be less than 50,000 square feet and would be considered local serving, resulting in a less than significant VMT impact. The Project would not be a regional serving project including retail projects, entertainment projects, and/or event centers, that would result in a net increase in VMT. Therefore, with implementation of TRAF-1 Promotions and Marketing, PDF TRAF-2 Reduced Parking Supply, and PDF TRAF-3 and MM TRAF-1, impacts would be less than significant.

Project Design Features

PDF TRAF-1: Promotions and Marketing: The Project would provide marketing and promotional tools to educate and inform employees about site specific transportation options and effects of their travel choices and opportunities to alter their habits through the office employers. It is assumed that 100 percent of employees would be eligible to be involved with a promotions and marketing program, allowing for the full 4% VMT reduction.

PDF TRAF-2 Reduced Parking Supply: Pursuant to City Ordinance No. 185,480 (Bicycle Parking Ordinance), new or existing code-required vehicle parking spaces for all uses may be replaced by bicycle parking at a ratio of one vehicle space for every four bicycle spaces. Based on LAMC, the project would typically require 219 vehicle parking spaces. Per City Ordinance No. 185, project would provide 213 vehicle parking spaces, six (6) fewer than the LAMC requirement.

PDF TRAF-3 Bicycle Parking and Amenities: The project would provide 26 short-and long-term bicycle parking spaces, (i.e., 26 bicycle parking spaces consisting of 9 short-term and 17 long-term spaces), and amenities such as shower/changing facilities.

Mitigation Measure

MM TRAF-1 Rideshare Program: The Project would provide either designated parking spaces and loading zones for ridesharing vehicles and/or an internal website or program to coordinate rides. The rideshare program would be implemented through the office employers. It is assumed that 100 percent of employees would be eligible to be involved with a ridesharing program, allowing for the full 15% VMT reduction.

c) 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. As further detailed below, the Project does not present any geometric design hazards related to traffic movement, mobility, or pedestrian accessibility, and no significant impact would occur. Pedestrians and bicyclists would be able to access the Project Site via existing sidewalks around the perimeter of the Project Site. Bicycle parking facilities would be provided on-site as part of the Project. The Project's access locations would be designed in compliance with City standards and safety requirements to be provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls.

Vehicular access to the western portion of the Project Site is currently provided by three driveways on N. McCadden Place and three driveways on N. Las Palmas Avenue. The Project proposes to close all driveways on N. McCadden Place and limit all vehicular access to the new building's parking garage to two driveways on N. Las Palmas Avenue. The two driveways are proposed along the western side of N. Las Palmas Avenue: (1) one driveway would provide two-way entry/exit to the subterranean parking levels beneath Building A for monthly parkers and valet parking, as well as entry to the ground floor parking level; and (2) the other driveway would provide a one-way exit from the ground floor parking level for Uber, Lyft or rideshare drop-off. There would also be an on-site drop-off area to serve rideshare arrivals/departures in the ground floor parking level. Existing temporary loading zones and driveways along the eastern side of N. Las Palmas Avenue associated with the existing office buildings at 1128-1146 N. Las Palmas Avenue would remain.

N. Las Palmas Avenue is identified as High Injury Network (HIN). Although Las Palmas Avenue is on the HIN, the driveway locations are preferable compared to N. McCadden Place because N. McCadden Place has pedestrian-friendly land uses such as a Charter School (1123 N. McCadden Place) and LGBT Youth Center (1118 N McCadden Place). Providing a driveway on McCadden Place would potentially create or increase vehicle-pedestrian and vehicle-bicycle conflicts.

N. McCadden Place and Santa Monica Boulevard is an unsignalized intersection whereas N. Las Palmas Avenue and Santa Monica Boulevard is a signalized intersection. With a driveway on McCadden Place, the intersection of McCadden Place and Santa Monica Boulevard would be likely to operate at an unacceptable level of service and would likely increase the queues by more than 50 ft.

Lastly, N. Las Palmas Avenue between Lexington Avenue and Santa Monica Boulevard witnessed zero traffic fatalities between 2010 and 2021. The Project's new driveways would be designed to comply with LADOT standards. Both driveways are on N. Las Palmas Avenue, a low volume local street with no existing bike lanes or transit facilities. Hence, the Project would not be expected to increase hazards or conflicts. . Therefore, impacts would be less than significant.

d) Result in inadequate emergency access?

Less Than Significant

Construction

Construction activity would add traffic to the local and regional transportation systems through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site.

Temporary Traffic Constraints

During construction, the Project would intermittently experience continuous concrete pour which may temporarily disrupt sidewalks near the Project. A covered pedestrian walkway would be provided as an alternative for pedestrians during construction and would also be addressed in the worksite traffic control plans.

During hoisting rebar and concrete pours, N. Las Palmas Avenue and N. McCadden Place would be intermittently disrupted. Both streets are classified as Local Streets in the City of Los Angeles Mobility Plan, and both are two-lane roadways. At times, the lane closest to the Project Site would have to be closed, and both travel lanes might need to be temporarily closed depending on the size of the cranes. Such intermittent travel lane closures may disrupt local traffic. However, a Construction Management Plan PDF TRAF-4, which would include a worksite traffic control plan that would be prepared, in accordance with applicable City guidelines, for any temporary closure of vehicle lanes or sidewalks and these plans would provide for safe and efficient movement for vehicular and pedestrian traffic.

Parking closure across the property frontage would be requested to allow for ongoing construction access and possible staging

Temporary Loss of Access

The existing land uses in the proximity of the construction site would remain open throughout construction. Pedestrian and vehicular access to properties nearby the Project Site would also remain open for the duration of construction. The sidewalks at the Project Site frontages along N. Las Palmas Avenue would be closed intermittently during the construction and access would be provided via a covered pedestrian walkway.

Temporary Loss of Bus Stops or Rerouting of Bus Lines

The construction of the Project would not result in any temporary loss of bus stops or rerouting of bus lines.

Haul Route

The proposed haul route for the Project would require trucks to access the Project Site from the nearby U.S. 101 using Santa Monica Boulevard (State Route 2) and N. Las Palmas Avenue. The maximum number of daily truck trips is estimated to be 150 trips per day and would occur during the peak construction phase (extending over 30 days).

As part of the Project, a detailed Construction Management Plan, included as PDF TRAF-4**,** would be implemented to minimize construction impacts for vehicles, bicyclists, and pedestrians. The Construction Management Plan would include measures such as off-site truck staging; scheduling deliveries and pick-ups of construction materials during non-peak travel periods; a worksite traffic control plan; use of flag

men to reroute traffic around any closures to ensure that access would remain unobstructed for land uses in proximity to the Project Site. The Construction Management Plan would be prepared and submitted to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community and avoid congestion. Implementation of the Construction Management Plan would ensure that vehicle and emergency vehicle access would be maintained throughout the course of construction activities.

Project Design Features

PDF TRAF-4: Construction Management Plan

The contractor would develop Construction Management Plan as part of the Project and submit it to the City of Los Angeles for approval to reduce the Project's potential construction impacts. The Construction Management Plan would include the following:

- Coordinate with the City to ensure adequate access to the Project Site and land uses in proximity of the Project site is maintained.
- Pick-ups and deliveries of construction materials should be scheduled off-peak hours to the extent possible.
- Reduce the potential of trucks waiting for extended periods to load or unload.
- Construction truck contractor should provide off-site staging in a legal area.
- Determine the number and location of flag men required during traffic rerouting and deliveries.
- Contractor to post construction notices/hotlines at several locations on the Project Site.
- Establish requirements for storage of materials and loading/unloading on the Project Site.
- Worksite traffic control plans approved by the City of Los Angeles should be implemented to route vehicles, bicyclists, and pedestrians around the area during any parking, travel lane or sidewalk closures.

Operation

Project operation would generate traffic in the Project vicinity and increase traffic within the area. However, emergency access to the Project Site and surrounding area would continue to be provided on adjacent streets similar to existing conditions. The Project Site is located along N. Las Palmas Avenue, N. McCadden Place, and Lexington Avenue, which are not designated as a Primary or Secondary Disaster Routes; however, Santa Monica Boulevard and Highland Avenue in the vicinity of the Project Site are identified as Primary Disaster Routes.[164] These Primary Disaster Routes would not be subject to any lane closures as a result of the Project. In addition, the Project is required to meet LAMC code requirements for adequate emergency access and comply with LAFD access requirements. The Project would comply with LAFD requirements inclusive of standards regarding fire lane widths and weight capacities needed to

[164] Los Angeles County Department of Public Works, Disaster Route Maps, South Los Angeles County, available at: https://pw.lacounty.gov/dsg/DisasterRoutes/map/Los%20Angeles%20Central%20Area.pdf

support fire fighting vehicles, markings, and on-site vehicle restrictions to ensure safe access. LAFD approval of plot plans showing fire hydrants and access for the Project would be required prior to the recording of the final map. LAFD approval of definitive plans and specifications, and any associated permits, would be required prior to commencement of any portion of the Project. Prior to the occupancy of the Project, LAPD would be provided with a diagram of the property, including access routes, and additional information to facilitate potential LAPD responses (see PDF-PS-2).

No policy or procedural changes to an existing emergency response plan or evacuation plan would be required due to operation of the Project. Furthermore, during an unanticipated disaster event, City agencies (i.e., Police and Fire Departments) would implement operational protocols, as well as plans and programs, on a case by-case basis to facilitate emergency evacuations and/or response, which would consider traffic conditions at the time of the emergency. In such instances, traffic would be routed along the City's disaster routes, as determined appropriate, by the applicable responding City agencies.

Cumulative Impacts

Whether a project would have a potential cumulative VMT impact is determined by assessing its consistency with the Southern California Association of Government's (SCAG) Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), per LADOT's TAG165. Projects that are consistent with the RTP/SCS in terms of location, density, and land-use assist in meeting the region's air quality and greenhouse gas (GHG) goals.

The western portion of the Project Site is currently zoned as limited manufacturing and is proposed to be developed as office space with a small retail space component (135 square feet). The Project's land use is similar to the existing use and consistent with the SCAG RTP/SCS plan. Because the Project is consistent with the RTP/SCS and has a less than a significant VMT impact, the Project would have a less than significant cumulative impact on VMT.

With regard to design hazards, the Project would not result in a significant impact. Each related project would be reviewed by the City to ensure compliance with the City's requirements relative to the provision of safe access for vehicles, pedestrian, and bicyclists, which would incorporate standards for adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls to protect pedestrian and enhance bicycle safety. Furthermore, since modifications to access and circulation plans are largely confined to a project site and immediate surrounding area, a combination of impacts with other related projects that could potentially lead to cumulative impacts is not expected. Therefore, the Project's contribution to a cumulative impact associated with hazardous design conditions would not be considerable.

Also, with regards to emergency access, the Project would not result in a significant impact. The Project Site and the surrounding area are located in an established urban area with a surrounding roadway network that includes multiple routes in the area that are available for emergency vehicles and evacuation. Drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

[165] LADOT Transportation Assessment Guidelines [2022], Section 2.2.4

As with the Project, related projects would be reviewed by the LAFD and LADOT to ensure compliance with the City's requirements relative to the provision of emergency access. Furthermore, since modification to emergency access and circulation plans are largely confined to a project site and immediate surrounding area, a combination of impacts with other related projects that could potentially lead to a cumulative impact is not expected. Therefore, the Project's contribution to cumulative emergency access impacts would not be considerable. Based on the above, the Project's contribution to cumulative transportation impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

Each related project would be required to comply with City requirements regarding haul routes and would implement mitigation measures and/or include project characteristics, such as traffic controls and safety procedures, as part of a Construction Management Plan, to reduce potential traffic impacts during construction. Also, pursuant to California Vehicle Code Section 21806, emergency vehicles are generally able to avoid traffic congestion in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Therefore, the Project would not make a cumulatively considerable contribution to a cumulative impact on emergency access, and the cumulative impact would be less than significant.

4.18 TRIBAL CULTURAL RESOURCES

ENVIRONMENTAL Issues	IMPACTS	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
TRIBAL CULTURAL RESOURCES. Would the project:					
a) 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: i) Listed or eligible for listing in the California					
i) 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)?		☐	☐	☒	☐
ii) 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?		☐	☐	☒	☐

This analysis is based in part on the *Tribal Cultural Resources Assessment: 1151 N. Las Palmas* prepared by Material Culture Consulting Inc., *December 2022.*

a) 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: i) Listed or eligible for listing in the California:

i) 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)?

ii) 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?

Less Than Significant Impact. The Tribal Cultural Resources Assessment included a CHRIS records search at the SCCIC, a search of the SLF by the NAHC, outreach efforts with nine Native American tribal representatives, a pedestrian survey of the Project Site, and a review of background/literature research to determine the likelihood or presence of tribal cultural resources.

The cultural resource records and background search identified 56 previously conducted cultural investigations and 167 previously recorded cultural resources within a 1-mile radius of the Project Site area. No prehistoric resources are present within 1-mile of the Project Site area. The NAHC responded on October 20, 2022, stating the SLF search was negative for any previously known tribal cultural resources or sacred lands within the Project Area or within 1-mile of the Project Area. The NAHC provided Material Cultural Consulting with contact information for nine tribes/individuals to reach out to for additional information.

Material Cultural Consulting did not engage in formal Consultation the Tribes per AB 52, but informally contacted the nine Native American Tribes or individuals identified by the NAHC. The outreach was conducted as an informational purpose only and formal consultation was conducted by the City of Los Angeles at the Lead Agency.

Material Cultural Consulting received two responses. These responses came in the form of letters, emails, and phone calls. On November 7,2022 Material Cultural Consulting received an email from Christina Conley, Tribal Consultant and Administrator for the Gabrielino Tongva Indians of California Tribal Council. Ms. Conley stated the Tribe has no comment regarding the Project.

On December 1, 2022, Anthony Morales, Chairperson for the Gabrieleno/Tongva San Gabriel Band of Mission Indians stated that there is a concern for excavation and there may be resources in the subsurface due to tribal villages being located within the area. He continued stating that at the time of development, Native American artifacts would not have been a concern and some resources may have been overlooked. Mr. Morales stated the Project warrants Native American participation and monitoring.

There are a few Native American sites located near the Project Site the village Yaangna was located approximately 6-miles southeast, the village Maugna was located approximately 3 miles northeast, the La Brea Tar Pits are located approximately 2-miles southwest. However, given over 100 years of prior development, the Project Site area is highly disturbed with the construction and demolition of roads, buildings, and parking lots. While the level of disturbance below the surface is unknown, it is likely that if any resources were present, their preservation is poor due to mechanical excavation over the years. Therefore, the Project Site's sensitivity for tribal cultural resources is low. Even so, the Project's construction of the new building's subterranean parking levels may result in encountering unanticipated tribal cultural resources.

Under AB 52, if a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that impact. PRC Section 21074 provides a definition of a TCR. In brief, in order to be considered a TCR, a resource must be either: 1) listed, or determined to be eligible for listing, on the national, State, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the State

register of historic resources or City Designated Cultural Resource. In applying those criteria, a lead agency shall consider the value of the resource to the tribe.

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.

In compliance with AB 52, the City provided notice to tribes soliciting requests for consultation on August 24, 2022. The Gabrieleno Band of Mission Indians – Kizh Nation requested consultation on the Project as the Project Site is located within the ancestral tribal territory of this tribe. Following a phone consultation on November 15, 2022, subsequent email communications, and research and review of all materials found and provided, the consultation period was concluded on March 6, 2023.

The City, as the lead agency, has determined that there is no substantial evidence in the record that would indicate that the Project would have a significant impact on any tribal resources; accordingly, no additional mitigation measures are necessary.

Nonetheless, due to possibility of inadvertent discovery, the Project will comply with all applicable regulations governing tribal resources. See Regulatory Compliance Measures RCM-CR-1 and RCM-CR-2. The City has also established a standard condition of approval to address the inadvertent discovery of tribal cultural resources.

These RCMs will ensure that if any tribal cultural resources are found during construction of the Project, they will be handled in compliance with state law and any and all applicable regulations. As the Project would be required to comply with its conditions of approval and these regulatory requirements, impacts would be less than significant.

Cumulative Impacts

Impacts related to TCRs tend to be site-specific and are assessed on a site-by-site basis. Many of the cumulative projects identified would require redevelopment of properties in urban areas that are currently developed and have been previously disturbed, and the potential to encounter and cause a significant impact on TCRs is diminished. The City would require the applicants of each of the related projects to assess, determine, and mitigate any potential impacts related to TCRs that could occur as a result of development, as necessary. As discussed previously, through compliance with existing laws and the City's conditions of approval, project impacts associated with TCRs would be less than significant. However, the occurrence of these impacts would be limited to the Project Site and would not contribute to any potentially significant cultural resources impacts that could occur at the sites of the related projects. As such, the project would not make any cumulatively considerable contribution to any potential cumulative impact related to TCRs.

4.19 UTILITIES AND SERVICE SYSTEMS

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

The following impact analysis pertaining to utilities and service systems includes information contained in the *Las Palmas Utility Infrastructure Draft Technical Report: Wastewater*, prepared by KPFF, December 2022, the *Las Palmas Utility Infrastructure Draft Technical Report: Water*, prepared by KPFF, December 2022, and the *Las Palmas Utility Infrastructure Draft Technical Report: Energy* prepared by KPFF, December 2022. These are included in **Appendix K**.

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Water

Less Than Significant Impact.

The facilities required to serve the Project Site include the large distribution system operated by the LADWP as well local infrastructure to meet the needs of the Project Site. As discussed under Section 6.19.b, below, LADWP can provide the needed water from its existing system pursuant of the

provisions in the City of Los Angeles Urban Water Management Plan (UWMP) 2020. Therefore, LADWP would not require added facilities to meet the demand from the Project.

Regarding the local infrastructure, the Project would consist of a commercial development that includes retail and office uses. The Project's proposed development activities would occur on the western portion of the Project Site located between N. McCadden Place and N. Las Palmas Avenue. The water infrastructure in the vicinity of the Project Site includes an existing 8-inch water main on Las Palmas Avenue and a 4-inch water main on N. McCadden Place. There are six hydrants within the vicinity of the Project Site, with four on N. Las Palmas Avenue, one on N. McCadden Place and one on Lexington Avenue.

Construction

Water for construction of the Project would be required for dust control, cleaning of equipment, excavation/export, removal, and re-compaction, etc. Based on construction projects of similar size and duration, a conservative estimate of construction water use ranges from 1,000 to 2,000 gallons per day (gpd). The estimated construction-period demand would be significantly less than the Project's estimated operational demand, which as described below, could be accommodated by the existing infrastructure. It is therefore anticipated that the existing water infrastructure would similarly meet the limited and temporary water demand associated with construction of the Project.

The Project would require construction of new, on-site water distribution lines to serve the new building. Construction impacts associated with the installation of water distribution lines would primarily involve trenching to place the water distribution lines below surface and would be limited to on-site water distribution, and minor off-site work associated with connections to the public main. Therefore, as part of the Project, a Construction Management Plan (PDF-TRAF-3) would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access. In addition, prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all water lines. LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service.

Therefore, the Project would not require the relocation or construction of new or expanded water facilities related to construction of the Project.

Operation

Water consumption estimates for the Project for the new development as shown on **Table 35:** *Estimated Water Demand For The Project,* based on the Los Angeles Bureau of Sanitation sewerage generation factors. An additional 20 percent has been added the sewerage generation factors to provide a conservative estimate for water consumption. As shown below, the water demand that would be generated by operation of the new development on the western portion of the Project Site would be 14,464 gpd, which would be an increase of 14,134 gpd over existing water consumption. Waste demands attributed to the four existing buildings on the eastern portion of the Project Site are not included in Table 37 below as their demands would not change as a result of the Project.

To accommodate the Project's estimated future water demand, the Project proposes to use the existing 1.5-inch water connection to the existing 1155 Las Palmas building and provide one 4-inch connection for domestic water and one 6-inch connection for fire water to the existing 8-inch water main in N. Las Palmas Avenue. The capacity of the 4-inch connection is 400 gpm and the capacity of the 6-inch connection is 1400 gpm. As determined in the *Las Palmas Utility Infrastructure Draft Technical Report: Water*, the existing connection is sufficient to handle the Projects increased demand. There are two types of connections that can be made to the City main. The Project would utilize independent water connections for fire and domestic water service. In addition, the Project would include backflow preventers and will be metered separately per City requirements.

The Project's water demand would be reduced by its incorporation of ultra-low flow plumbing fixtures throughout the Project's new development. Additionally, all drains would feed into a rainwater harvesting cistern, to be used for irrigation of the on-site landscaping. The irrigation system would utilize a dedicated landscape water meter and automatic weather-based controllers with electronically operated control valves and seasonal irrigation schedules. All areas would include high efficiency irrigation emitters, including micro spray and drip irrigation. Bubblers would be used for trees or shrubs where drip irrigation is not feasible. Therefore, the Project's impacts on water infrastructure capacity would be less than significant.

Table 35: Estimated Water Demand For The Project

Land Use	Units	Generation Rate (gpd/unit) [1]	Total Wastewater Generation (gpd) [2]
Existing			
1155 Manufacturing	5,498 SF	50 KGSF	275
20% Contingency [2]			+20% = 330
Subtotal Existing			330
Proposed			
1155 Office Building	5,498 SF	50 KGSF	275
20% Contingency [2]			+20% = 330
1155 Office Building	695 SF	120 KGSF	83
20% Contingency ([2]			+20% = 99.6
1151 Office Building	80,987 SF	120 KGSF	9,718
20% Contingency [2]			+20% = 11,662
Auto Parking	98,872 SF	20 KGSF	1,977
20% Contingency [2]			+20% = 2,372
Gross Water Generation			14,464
Subtotal Existing			(330)
Net Increase			14,134

(1) Generation Rates per Bureau of Sanitation – Sewer Generation Factors for Residential and Commercial Categories
(2) An additional 20% contingency for overall water use has been included in this water demand table to provide a conservative estimate of water usage.
https://engpermitmanual.lacity.org/sites/default/files/documents/Sewage%20Generation%20Factors%20Chart.pdf

Article 7 of the Fire Protection and Prevention, Section 57.507 of the LAMC sets the fire flow requirements for the Project. These guidelines, in addition to the requirements set by the City Fire Chief, will prescribe the fire flow requirements and hydrant spacing requirements for the Project. Based on fire flow standards set forth in Section 57.507 of the LAMC, the Project Site falls within the industrial commercial, which requires 6,000-9,000 gpm from 4 to 6 adjacent hydrants flowing simultaneously. This translates to 1,000-1500 gpm flowing from each hydrant and a minimum residual pressure of 20 pounds per square inch (psi). An Information of Fire Flow Availability Request (IFFAR) was submitted to LADWP and approved on October 25, 2022, which shows that the fire hydrants near the Project would meet the 6,000 gpm and 20 psi minimum requirement.

The Project would incorporate a fire sprinkler suppression system to reduce or eliminate the demands on public hydrants, which system would be subject to Fire Department review and approval during the design and permitting of the Project. Based on Section 94.2020.0 of the LAMC that adopts by reference NFPA 14-2013 including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building would be 1,250 gpm.

In addition, a Service Availability Report (SAR) was submitted and approved on October 20, 2022, by the LADWP, to determine if the existing public water infrastructure could meet the demands of the Project. The SAR results show that 1,400 gpm can be delivered to the Project with a minimum residual pressure of 82 psi. These two results demonstrate that the adjacent water infrastructure is sufficient to meet the Project's water demands.

Therefore, there would be adequate capacity available to accommodate the required fire flows and domestic water demand generated by the Project and the Project would not require the relocation or construction of new or expanded water facilities. The impact would be less than significant, and no mitigation measures are required.

Wastewater

Less Than Significant Impact.

The existing wastewater infrastructure that serves the Project includes 8-inch concrete sewer line and a 30-inch Vitrified Clay Pipe (VCP) line in N. Las Palmas Avenue. Both pipes run from Lexington Avenue south towards Santa Monica Boulevard. There is an 18-inch concrete sewer line in N. McCadden Place. The pipe runs south from Lexington Avenue towards Santa Monica Boulevard. Based on the Los Angeles Bureau of Engineering's online Navigate LA database, the 8-inch sewer main in Las Palmas Avenue has a calculated capacity of 1.20854 cubic feet per second (cfs) (0.78110 million gallons per day (MGD)), the 30-inch sewer main in Las Palmas Avenue is 48.77556 cfs (31.52447 MGD), and the 18-inch sewer line in N. McCadden Place is approximately 10.68499 cubic feet per second (cfs) (6.90589 MGD).

The City of Los Angeles has one of the largest sewer systems in the world including approximately 6,439 miles of sewers serving a population of more than four million. The Los Angeles sewer system is comprised of three smaller systems: Hyperion Sanitary Sewer System, Terminal Island Water Reclamation Plant

Sanitary Sewer System, and Regional Sanitary Sewer System.[166] The Project Site is located within the Hyperion Sewer System Service Area, which is operated and maintained by the Los Angeles Bureau of Sanitation (BOS). The existing design capacity of the Hyperion Sewer System Service Area is approximately 550 million gallons per day (consisting of 450 MGD at the Hyperion Treatment Plant, 80 MGD at the Donald C. Tillman Water Reclamation Plant, and 20 MGD at the Los Angeles–Glendale Water Reclamation Plant).[167]

Construction

Wastewater would be generated throughout construction of the Project as a result of construction workers on-site. However, construction workers would utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation resulting from Project construction activities is not anticipated to cause any increase in wastewater flows. Construction impacts associated with the installation of new wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main. Although no upgrades to the public main are anticipated, minor off-site work would be required in order to connect to the public main.

Therefore, as part of the Project, a construction management plan (PDF-TRAF-3) would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access. Should perched groundwater be encountered during construction, it would be directed to a dewatering system and discharged in accordance with all applicable rules and regulations under the NPDES Construction General Permit regulations and the City's grading permit conditions. Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete. Therefore, the Project impact on wastewater associated with construction activities would be less than significant.

Operation

The estimated sewer flows for the new development on the western portion of the Project Site were based on the sewer generation rates per the Los Angeles Bureau of Sanitation sewerage generation factors. Wastewater demands attributed to the four existing buildings on the eastern portion of the Project Site are not included in **Table 36**: *Estimated Wastewater For The Project*, below as their demands would not change as a result of the Project. Based on the type of use and generation factors, the Project will generate a net increase of approximately 11,778 gallons per day (gpd) of wastewater.

[166] City of Los Angeles Department of Public Works, LA Sanitation, Sewer System Management Plan, Hyperion Sanitary Sewer System, January 25, 2019. https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf, Accessed October 31, 2022

[167] City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer System Management Plan Hyperion Sanitary Sewer System, January 25 2019, https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf, accessed December 22, 2022.

Table 36: Estimated Wastewater For The Project

Land Use	Units	Generation Rate (gpd/unit) (1)	Total Wastewater Generation (gpd)
Existing			
1155 Manufacturing	5,498 SF	50 KGSF	275
Proposed			
1155 Building	5,498 SF	50 KGSF	275
1155 Office Building	695 SF	120 KGSF	83
1151 Office Building	80,987 SF	120 KGSF	9,718
Auto Parking	98,872 SF	20 KGSF	1,977
Gross Wastewater Generation			**12,053**
Subtotal Existing			**(275)**
Net Increase			**11,778**
(1) Generation Rates per Bureau of Sanitation – Sewer Generation Factors for Residential and Commercial Categories https://engpermitmanual.lacity.org/sites/default/files/documents/Sewage%20Generation%20Factors%20Chart.pdf			

A Sewer Capacity Availability Request (SCAR) was submitted to the Los Angeles Bureau of Sanitation to determine whether the existing public infrastructure can accommodate the Project's wastewater generation. The Los Angeles Bureau of Sanitation approved the SCAR on November 07, 2022, having analyzed the Project's demand in conjunction with existing conditions and forecasted growth and has approved the Project to discharge up to 11,778 gpd.

The Project's net increase in sewage generation of approximately 11,778 GPD (0.012 MGD) would be directed to the existing 8-inch main in N. Las Palmas Avenue via a new 6-inch lateral. The existing capacity of the 8-inch sewer line in N. Las Palmas Avenue is approximately 1.21 cubic feet per second (cfs) (0.65 MGD).[168]

The proposed sewerage flow from the Project into the wastewater main is approximately 0.0182 cfs (0.012 MGD). Therefore, the Project sewerage discharge would account for 1.8 percent of the available capacity in the N. Las Palmas Avenue wastewater main with 0.638 MGD remaining. As such, impacts on wastewater infrastructure would be less than significant.

As further discussed above, the existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (consisting of 450 MGD at the Hyperion Treatment Plant, 80 MGD at the Donald C. Tillman Water Reclamation Plant, Reclamation Plant, and 20 MGD at the Los Angeles–Glendale Water Reclamation Plant).[169] The Project's proposed wastewater generation is approximately 0.012 MGD. Currently up to 300 MGD is treated at the Hyperion Treatment Plant, resulting in an available treatment capacity of 150 MGD, which means the Project would account for approximately 0.008 percent of the

[168] https://navigatela.lacity.org/navigatela/

[169] City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer System Management Plan Hyperion Sanitary Sewer System, January 25 2019, https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf, accessed August 22, 2022.

available capacity of the Hyperion Treatment Plant.[170] Consequently, impacts on wastewater treatment capacity would be less than significant.[171]

Stormwater

Less Than Significant Impact.

The Project Site is comprised of approximately 100-percent impervious surfaces under existing conditions. With implementation of the project, the amount of impervious area would be reduced to 97 percent. As discussed in Section 4.10, *Hydrology and Water Quality* above, the Project would be designed to comply with the City of Los Angeles's LID design standard. 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 rainwater harvesting system. This stormwater will be used as irrigation. Stormwater in excess of this design rainfall, will overflow via a parkway drain to the curb face.

Drainage structures and improvements within the City are subject to review and approval by the City's Department of Public Works and LADBS. As required by the Department of Public Works, all public storm facilities must be designed in conformity with the standards set forth by Los Angeles County. The Department of Public Works reviews and approves Municipal Separate Storm Sewer Systems plans prior to construction. Any proposed increases in discharge directly into County facilities, or proposed improvements of County-owned Municipal Separate Storm Sewer System facilities, such as catch basins and drainage lines, require approval from County Flood Control to ensure compliance with NPDES Permit requirements.

Environmental impacts associated with the development of the project, including on-site drainage facilities, have been evaluated throughout this MND. As concluded herein, all potentially significant impacts associated with development of the Project, including on-site stormwater drainage facilities would be less than significant. Therefore, the Project would not require the relocation or construction of new or expanded stormwater facilities.

Therefore, impacts to stormwater would be less than significant, and no mitigation measures are required.

Electricity

Less Than Significant Impact.

Construction

Electrical power would be consumed to construct the new buildings and facilities of the proposed Project. Typical uses include temporary power for lighting, equipment, construction trailers, etc. The demand is typically supplied from existing electrical services within the Project Site and would not affect other services. Overall, demolition and construction activities would consume less electricity than the existing

[170] [170] City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer System Management Plan Hyperion Sanitary Sewer System, January 25 2019, https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf, accessed December 12, 2022.

[171] City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer System Management Plan Hyperion Sanitary Sewer System, January 25 2019, https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf, accessed December 12, 2022.

office when operating. Therefore, impacts on electricity supply associated with short-term construction activities would be less than significant.

Operation

Once the Project is operational, it would create electricity demand from a variety of sources including the commercial and retail uses on the Project Site, and related off-site water treatment and distribution.

The estimated annual Project-related increase in the consumption of electricity would be approximately 2,132,032 kilowatt-hours (kWh). When compared to the LADWP's projected sales in 2024 of 23,268 GWh per year, the Project's estimated electricity demand would represent approximately 0.003 percent of total demand. This amount is negligible and is within the anticipated service capabilities of LADWP. Further, the Project would be required to comply with energy conservation standards contained in Title 24 of the California Code of Regulations. The Project would also be required to comply with the L.A. Green Building Code), which incorporates by reference the CALGreen Code. The L.A. Green Building Code, effective January 1, 2020, requires the use of numerous energy conservation measures beyond those required by Title 24 of the California Code of Regulations. Estimated energy consumption does not take into account reductions provided by adherence to the L.A. Green Building Code.

Furthermore, a will serve letter dated October 20, 2022, from LADWP has indicated it has enough capacity to provide electricity to the Project Site. LADWP states that the estimated electricity requirement for operation of the Project is part of the total load growth forecast for the City and has been considered in the planned growth of the power system.

Therefore, the Project would not necessitate the construction of off-site electrical facilities or infrastructure improvements that would have the potential to cause a significant environmental impact.

Natural Gas

Less Than Significant Impact.

Construction

No natural gas usage is expected to occur during construction. Therefore, impacts on natural gas supply associated with short-term construction activities would be less than significant.

Operation

New Project buildings will not consume natural gas. Existing buildings would continue to operate as they do under existing conditions, and no increase in energy consumption would be anticipated. The impacts would be less than significant, and no mitigation measures are required.

Telecommunications

Less Than Significant Impact. Any new telecommunication connections would be constructed by the private utility service provider and follow all appropriate regulatory requirements of such a connection. New service point connections to provide telecommunications services to the new buildings would be provided in conformance with all applicable federal, state, and county requirements. The Project would

not result in the relocation or expansion of telecommunication facilities. The impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. As stated above, using the City's generation rates, the Project is expected to generate a water demand of 14,464 gpd, which would be an increase of 14,134 gpd over existing conditions.

The Project would be designed to meet CALGreen and Title 24 Building Standards Code. The project would emphasize water conservation, which would be achieved through the use of energy star appliances, and low-flow plumbing fixtures. Additionally, all drains would feed into a rainwater harvesting system to be used for irrigation of the on-site landscaping. The irrigation system would be designed to meet or exceed the state Model Water Efficient Landscape Ordinance. The system would utilize a dedicated landscape water meter and automatic weather-based controllers with electronically operated control valves and seasonal irrigation schedules. All areas would include high efficiency irrigation emitters, including micro spray and drip irrigation. Bubblers would be used for trees or shrubs where drip irrigation is not feasible.

With implementation of additional water conservation measures per regulatory requirements, and the Project's water conservation features, the project's actual water demand would be less than the amount stated above. Compliance with water conservation measures required by State and City green regulations would reduce this estimated projected water demand.

The Metropolitan Water District's 2020 Regional UWMP addresses the future of Metropolitan Water District's water supplies and demand through the year 2045. To determine the overall service area reliability, the UWMP included three hydrologic conditions: average year (30- year median hydrology from FY 1985/86 to FY 2014/15); single-dry year (repeat of the 1989/90 hydrology); and multi-dry year (FY 1987/88 to FY 1991/92 hydrology). As noted in the 2020 UWMP, LADWP does not anticipate water shortages as demands are met by the available supplies under all hydrologic scenarios through 2045. Achieving LADWP's water supply would include multiple strategies to achieve and maintain water use reductions, including investments in state-of-the-art technology; recycled water; stormwater recapture, installation of water-efficient fixtures and appliances, expansion and enforcement of prohibited water uses, reductions in outdoor water use, extending education and outreach efforts; and encouraging regional conservation efforts. Conservation and water use efficiency are a foundational component of LADWP's water resource planning efforts and will continue to be central to the City's water use efficiency goals over the long term.[172]

In the 2020 Regional UWMP, the projected 2045 water demand for a Single Dry Year is 1,551,000 acre-feet per year (afy), and the capability of current supplies 2,479,500 afy, a potential surplus of 928,500 afy, For multiple dry weather years, (FY 1988-1992 Hydrology scenario), the capability of current water supplies would be 2,239,000 afy; a potential surplus of 648,000 afy.

[172] https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply/a-w-sos-uwmpln?_afrLoop=242685679229984&_afrWindowMode=0&_afrWindowId=1b2yajr4zp_1#%40%3F_afrWindowId%3D1b2yajr4zp_1%26_afrLoop%3D242685679229984%26_afrWindowMode%3D0%26_adf.ctrl-state%3D1b2yajr4zp_17. Accessed December 22, 2022

According to the reliability data in the City of Los Angeles 2020, the most recent plan available, LADWP has sufficient supply to meet a total water demand of 746,000 in acre feet (af), by the year 2045. LADWP has programs to reduce the demand to 565,800 afy by 2045, a difference of 180,200 afy. As noted in the UWMP, the City's water usage today is lower than it was in the 1970s despite an increase in population of over one million people and reflects the success and importance of the City's conservation strategies that include water conservation regulations, ordinances, and behavior changes resulting from customer outreach and educational programs.

The UWMP is based on SCAG growth projections and takes into account all expected regional growth. As indicated in the discussion in Section 4.14, *Population and Housing*, the Project's employment contributions to growth fall within the range of growth accounted for in the SCAG projections that are used for future planning activities and provision of services. The projections are revised at 4-year intervals so as to stay current with current growth trends and changes in land use activity. Changes to planning and zoning designations can be incorporated in a timely fashion so long as the resulting growth does not exceed the growth projections. The UWMP is updated at regular five-year cycles and includes programs to meet the supply requirements.

As stated above, using the City's generation rates, the project is expected to generate a water demand of 14,464 gpd, which would be an increase of 14,134 gpd over existing conditions. The Project's increase in water demand would fall within the available and projected water supplies reported in the 2020 UWMP for the City for 2045 and would constitute less than 0.01 percent of the City's projected 2045 water supply.

As there would be sufficient water supplies available to serve the Project, the impact regarding water supply would be less than significant, and no mitigation measures are required.

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?

Less Than Significant Impact. As stated in Section 4.19.a, the Project will generate a net increase of approximately 11,778 gallons per day (gpd) of wastewater. Given the current capacity of the Hyperion Service Area, the Hyperion Service Area would have ample capacity to serve the project's wastewater generation, and as concluded in the SCAR the BOS would have adequate capacity to serve the Project. The Project would have a less than significant impact with respect to wastewater treatment capacity and no mitigation measures are required.

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?

Less Than Significant Impact. Solid waste management in the City of Los Angeles involves both public and private refuse collection services, as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. The City of Los Angeles BOS is responsible for developing strategies to manage solid waste generation and disposal in the City of Los Angeles. The BOS collects solid waste generated primarily by single-family dwellings, small multifamily dwellings, and public facilities. Private hauling companies collect solid waste generated primarily from large multifamily residential, commercial,

and industrial properties. The City of Los Angeles does not own or operate any landfill facilities, and the majority of its solid waste is disposed of at County landfills.

In 2019, the most recent report available. the total amount of solid waste (including an import amount of 168,639 tons) disposed of at in-county Class III (nonhazardous solid waste) landfills, transformation facilities, and out-of-County landfills was approximately 11 million tons.[173] The remaining disposal capacity for the County's Class III (nonhazardous solid waste) landfills is estimated at approximately 148.40 million tons as of December 2019, the most recent data available.[174] Waste from the City of Los Angeles is disposed of primarily at the Sunshine Canyon and Chiquita landfill sites. Of the 148 million tons of remaining capacity within the County, 56.99 million tons, or approximately 38 percent, is located at the Chiquita Canyon landfill, which has a remaining life of 28 years. In addition to in-County landfills, out-of-County disposal facilities are also available to the City of Los Angeles.

As discussed in County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2019 Annual Report, a shortfall in solid waste disposal capacity within the County is not anticipated to occur within the next 15 years under current conditions. The County anticipates that future disposal needs over the next 15 years can be adequately met through increased waste reduction and diversion efforts, development of alternative technologies, exportation of waste to out-of-County facilities, the Waste-by-Rail system to Mesquite Regional Landfill, in Imperial County, and if found to be environmentally sound and technically feasible, the expansion of in-County Class III landfill capacity.[175]

The City's Solid Waste Integrated Resources Plan (SWIRP), most commonly known as the City's Zero Waste Plan, provides a long-term plan through 2030 for the City of Los Angeles's solid waste programs, policies, and environmental infrastructure. The SWIRP aims for the City of Los Angeles to achieve a goal of 90 percent diversion by 2025. This targeted diversion rate would be implemented through an enhancement of existing policies and programs such as implementing additional downstream programs (e.g., adding textiles to the blue bin recycling program; adding food scraps to the green bin recycling program; and requiring private solid waste collection service to provide access to multifamily and commercial customers); implementation of mandatory participation programs for residential, government, commercial, industrial, and institutional users; requiring transfer stations and landfills to provide resource recovery centers; and increased diversion requirements at construction and demolition (C&D) facilities pursuant to new policies and programs, and the development of future recycling facilities.[176]

[173] County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2019 Annual Report. September 2020.

[174] County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2019 Annual Report. September 2020. Appendix E-2. https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF

[175] County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2019 Annual Report. September 2019. https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF

[176] Solid Waste Integrated Resources Plan, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?_afrLoop=3051744924890389&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=13klmvo8k5_1#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D3051744924890389%26_afrWindowMode%3D0%26_adf.ctrl-state%3D13klmvo8k5_5 Accessed December 22, 2022

As shown in **Table 37:** *Projected Solid Waste Generated During Operation* the Project could generate approximately 522 pounds of solid waste per day which translates into 0.261 tons per day or 95 tons per year. This waste generation could be accommodated by the County's available regional landfills, and as discussed above. Furthermore, this is a conservative analysis as the Project waste generated by the Project would be subject to State and local recycling and waste diversion strategies and policies including the City's SWIRP goal of achieving a 90 percent solid waste diversion rate by 2025.

Table 37: Projected Solid Waste Generated During Operation

Land Uses	Quantity	Generation Rate[a]	Total (lbs/day)
Proposed Land Uses			
Office	87,045 sf	6/lb/1000 sf ft/day	522.27
Retail	135 sf	0.046/lb/sq ft/day	0.62
		Total	**522.3**

Notes:
lbs = pounds; sf = square feet
To provide for a conservative analysis, the converted manufacturing uses at 1155 Las Palmas re included as new uses in this analysis.
a) CalRecyle, Estimated Solid Waste Generation Rates, https://www2.calrecycle.ca.gov/wastecharacterization/general/rates, Accessed December 22, 2022

Project construction would include the demolition of parking lot materials and approximately 51,800 cy of excavated soil. Construction and Demolition (C&D) materials would be conveyed pursuant to the City's Waste Hauler Permit Program (Ordinance 181519), effective January 1, 2011. Under this Ordinance, all private waste haulers collecting solid waste within the City, including C&D waste, are required to obtain AB 939 Compliance Permits and to transport C&D waste to City certified C&D processing facilities. These facilities process received materials for reuse and have recycling rates that vary from 70 percent to 84 percent.

Furthermore, the project would comply with CALGreen code Section 99.04.408, which would ensure that at least 65 percent of the demolition and construction waste generated would be recycled and/or salvaged. The amount of solid waste generated by the project is within the available capacities of area landfills, and the project's impacts to regional landfill capacity would be less than significant.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. 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, Assembly Bill 341 (AB 341), which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in

March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The "blueprint" of the plan builds on the key elements of existing reduction and recycling programs and infrastructure, and combines them with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, renewable fuels, chemicals, and energy. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. More recently, in October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week shall arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week shall arrange for organic waste recycling services.

The City's SWIRP, provides a long-term plan through 2030 for the City of Los Angeles's solid waste programs, policies, and environmental infrastructure. The SWIRP aims for the City of Los Angeles to achieve a goal of 90 percent diversion by 2025. This targeted diversion rate would be implemented through an enhancement of existing policies and programs such as implementing additional downstream programs (e.g., adding textiles to the blue bin recycling program; adding food scraps to the green bin recycling program; and requiring private solid waste collection service to provide access to multifamily and commercial customers); implementation of mandatory participation programs for residential, government, commercial, industrial, and institutional users; requiring transfer stations and landfills to provide resource recovery centers; and increased diversion requirements at C&D facilities pursuant to new policies and programs, and the development of future recycling facilities.

Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant, and no mitigation measures are required.

Based on the factors discussed above, the Project would result in less than significant impacts regarding solid waste and no mitigation measures are required.

Cumulative Impacts

Water Supply

All of the related projects are subject to City review to assure that the existing public utility facilities would be adequate to meet the domestic water and fire water demands of each project. Developers are required to improve facilities where appropriate and development cannot proceed without appropriate verification and approval by LADWP and LAFD, with funding by the developers. Required improvements by related projects if they should occur, would be limited to minor, local improvements. Such improvements require only minor construction with very limited short-term construction impacts on traffic and perhaps noise. As noted above, the project would not require improvements to local mainlines.

There are 15 related projects, which consist of commercial, residential, mixed-use and office uses. The total increase in water demand for the related projects is approximately 0.258 MGD. Combined with the Project, the increase in water demand is approximately 0.273 MGD. The Project's increase in water

demand would fall within the available and projected water supplies reported in the 2020 UWMP for the City for 2045.

LADWP, as a public water service provider, is required to prepare and periodically update an UWMP to plan and provide for water supplies to serve existing and projected demands within its jurisdiction. The UWMP prepared by LADWP is based on the growth projections that are provided in the SCAG RTP/SCS, which is updated on 4-year cycles to account for changes in growth rates, and which accounts for existing development within the City, as well as projected growth anticipated to occur through redevelopment of existing uses and development of new uses. Each of the related projects would need to be consistent with the SCAG RTP/SCS projections in order to be accounted for in LADWP's UWMP current and projected available water demand. As the LADWP's UWMP is based on growth projections in the SCAG RTP/SCS, no significant cumulative water supply impact is anticipated from cumulative development.

As discussed above, the Project's net demand on water supplies would fall within the available and projected water supplies projected in LADWP's UWMP. Related projects would be required to provide local connections subject to review for service availability, subject to LADWP water system rules and requirements. The Project's contribution to a cumulative impact on water supply would not be cumulatively considerable and the cumulative impact regarding water supply would be less than significant.

Wastewater

The Project would result in the additional generation of sewer flow. However, as discussed above, BOS has conducted an analysis of existing and planned capacity as it relates to the Project. Similarly, future projects connecting to the same sewer system would also be required to obtain sewer connection permits and submit SCARs to BOS during the design phase of the projects. As with the Project, all related projects in the City of Los Angeles would be subject to the provisions of the LAMC requiring provision of on-site infrastructure, improvements to address local capacity issues and payment of fees for future sewerage replacement and/or relief improvements. The analysis by the BOS takes into consideration previously approved SCARs as part of their review. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the related projects and BOS to construct the necessary improvements.

The total increase in wastewater generation for the related projects is approximately 0.215 MGD. Combined with the Project, the increase in wastewater generation would be approximately 0.335 MGD.

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Treatment Plant system. As previously stated, based on information from BOS, the existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (MGD)[177] and the existing average daily flow for the system is approximately 300 MGD.[178] Currently up to 300 MGD is treated at the Hyperion Treatment Plant resulting in a treatment capacity of 150 MGD. The estimated wastewater generation increase of the Project would be 0.012 MGD, which represents

[177] City of Los Angeles Department of Public Works, Bureau of Sanitation, Water Reclamation Plants, https://www.lacitysan.org/san/faces/home/portal, accessed May 7, 2019.
[178] City of Los Angeles Department of Public Works, LA Sanitation, Sewer System Management Plan, Hyperion Sanitary Sewer System, January 2019.

approximately 0.008 percent of the available capacity in the system. The estimated wastewater generation increase of the Project and related projects combined would be 0.223 MGD, which would represent approximately 0.15 percent of the available capacity in the system. The related projects would also be required to adhere to the BOS's annual wastewater flow increase allotment. Therefore, cumulative impacts on wastewater treatment capacity would be less than significant.

Electricity

As discussed in Section 4.6, *Energy*, as described in LADWP's 2017 Power Strategic Long-Term Resource Plan, LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. LADWP has indicated that the Power Strategic Long-Term Resource Plan incorporates the estimated electricity requirement for the Project. The Power Strategic Long-Term Resource Plan considers future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. Development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Each of the related projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. Related projects would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the Project area. As such, the Project's contribution to cumulative impacts with respect to electricity infrastructure would not be cumulatively considerable and, thus, would be less than significant.

Telecommunications

Telecommunications are regulated by the Federal Communications Commission and CPUC. Each of the related projects would be reviewed by the City to identify necessary new facilities and service connections to meet their respective needs. The Project's contribution to cumulative impacts with respect to telecommunications as well as infrastructure would not be cumulatively considerable and, thus, would result in a less than significant cumulative impact.

Solid Waste

Solid waste disposal is a regional issue addressed by regional agencies, in this case the County of Los Angeles. The County promotes the efforts of individual jurisdictions to maximize waste reduction and recycling, expand existing landfills, and promote alternative technologies to reduce waste. Most notably, the City of Los Angeles, as part of its SWIRP, aims for the City of Los Angeles to achieve a goal of 90 percent diversion by 2025. The analysis of the project's potential impacts, above, is based on landfill capacity and demand per the Countywide Integrated Waste Management Plan. Planning for landfill needs takes into account continuing cumulative demand and increases in cumulative demand associated with growth including construction and operation of projects. Therefore, the analyses associated with that plan take into account cumulative development.

Like the Project, the related projects would be required to comply with applicable regulations related to construction and operation of solid waste, including those pertaining to waste reduction and recycling. Detailed components regarding waste reduction and recycling would be finalized for each related project

on a project-by-project basis at the time of plan submittal to the City for the necessary building permits and reviews conducted pursuant to the L.A. Green Building Code, as applicable. As such, impacts to the solid waste from related projects would be less than significant. As discussed above, the project would not generate solid waste that would exceed landfill capacities and the recycling of solid waste related to construction and operation of the project would be required to comply with all federal, State, and local regulations including the L.A. Green Building Code and the SWIRP.

The Project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts related to solid waste would be less than significant.

4.20 WILDFIRE

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

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project Site is comprised of eight parcels and includes two locations with N. Las Palmas Avenue bisecting the lots. The western portion of the Project Site is currently developed with a one-story manufacturing building and a surface parking lot. The eastern portion of the Project Site is currently developed with four office buildings ranging from one- to two-stories. The only vegetation permanently located on the Project Site are trees, shrubs, and other plants. The Project Site is located one block north of Santa Monica Boulevard and two blocks east of Highland Avenue, both designated as disaster routes, which may be utilized for an evacuation route during an emergency.[179] The Project Site is not located in an area of moderate or very high fire hazard.[180] Additionally, the Project is not located in or near state responsibility areas of lands classified as very high fire hazard severity zones.[181] As the Project is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones, with respect to wildfire hazards, the Project's construction and operation would not result in the impairment of an adopted emergency response plan or emergency evacuation plan.

[179] Los Angeles County Department of Public Works, Disaster Route Maps, City of Los Angeles Central Area and City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles, Adopted November 1996, available at: https://pw.lacounty.gov/dsg/DisasterRoutes/map/Los%20Angeles%20Central%20Area.pdf.

[180] Zimas Website, http://zimas.lacity.org/, August 18, 2022.

[181] Los Angeles County Fire Hazard Severity Zones in SRA, adopted by CAL FIRE on November 7, 2007, https://egis.fire.ca.gov/FHSZ/, accessed August 18, 2022

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?

No Impact. The Project Site is comprised of eight parcels and includes two locations with N. Las Palmas Avenue bisecting the lots. The western portion of the Project Site is currently developed with a one-story manufacturing building and a surface parking lot. The eastern portion of the Project Site is currently developed with four office buildings ranging from one- to two-stories. The only vegetation permanently located on the Project Site are trees, shrubs, and other plants. The Project Site is located one block north of Santa Monica Boulevard and two blocks east of Highland Avenue, both designated as disaster routes, which may be utilized for an evacuation route during an emergency.[182] The Project Site is not located in an area of moderate or very high fire hazard.[183] Additionally, the Project is not located in or near state responsibility areas of lands classified as very high fire hazard severity zones.[184] As the Project is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones, with respect to wildfire hazards, the Project's construction and operation would not result in the impairment of an adopted emergency response plan or emergency evacuation plan.

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?

No Impact. The Project Site is not located in an area of moderate or very high fire hazard.[185] Additionally, the Project Site is not located in or near state responsibility areas of lands classified as very high fire hazard severity zones.[186] Therefore, because the Project Site is not located near a state responsibility area nor any very high fire severity zone, with respect to wildfire hazards, construction and operation of the Project would not require installation or maintenance of associated that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Therefore, no impacts would occur, and no mitigation measures would be required.

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?

No Impact. The Project Site is not located in an area of moderate or very high fire hazard.[187] Additionally, the Project Site is not located in or near state responsibility areas of lands classified as very high fire hazard severity zones.[188] The Project Site is surrounded by urban development and is not adjacent to any wildlands. The Project Site is not located with a 100-Year or 500-Year flood plain.[189]

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[182] Los Angeles County Department of Public Works, Disaster Route Maps, City of Los Angeles Central Area and City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles, Adopted November 1996, available at: https://pw.lacounty.gov/dsg/DisasterRoutes/map/Los%20Angeles%20Central%20Area.pdf.

[183] Zimas Website, http://zimas.lacity.org/, August 18, 2022.

[184] Los Angeles County Fire Hazard Severity Zones in SRA, adopted by CAL FIRE on November 7, 2007, https://egis.fire.ca.gov/FHSZ/, accessed August 18, 2022

[185] Zimas Website, http://zimas.lacity.org/, accessed August 18, 2022.

[186] Los Angeles County Fire Hazard Severity Zones in SRA, adopted by CAL FIRE on November 7, 2007, https://egis.fire.ca.gov/FHSZ/, accessed August 18, 2022

[187] Zimas Website, http://zimas.lacity.org/, accessed August 18, 2022.

[188] Los Angeles County Fire Hazard Severity Zones in SRA, adopted by CAL FIRE on November 7, 2007, https://egis.fire.ca.gov/FHSZ/, accessed August 18, 2022

[189] Phase I Environmental Site Assessment, 1128-1146 and 1155 North Las Palmas Avenue, Los Angeles, CA Prepared for the BARDAS Investment Group, Prepared by RMD Environmental Solutions, April 6, 2021

The Project Site is relatively flat with little topography that would expose people or structures to landslides. The Project would not contain uses or activities that would exacerbate existing environmental conditions. The Project Site is not located within a landslide inventory area.[190] Combined with the fact that the Project Site is not within or near a state responsibility area or a very high severity fire zone, there is no impact in relation to risks associated with downslope or downstream flooding or landslides as a result of runoff or post fire slope instability or drainage changes. Based on the above considerations, the Project which would have no wildfire impacts, would not result in a cumulatively considerable contribution to cumulative impacts associated with wildfires. Therefore, no impacts would occur, and no mitigation measures would be required.

Cumulative Impacts

Neither the Project Site nor any of the sites of the related projects are located near or within the boundaries of a state responsibility area or land classified as very high fire hazard severity zone. Therefore, no cumulative impacts related to this issue would occur.

[190] Zimas Website, http://zimas.lacity.org/, August 18, 2022.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

a) 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?

Less Than Significant Impact with Mitigation Incorporated. The preceding analysis does not reveal any significant immitigable impacts to the environment. The Project Site is located within a highly urbanized area and is currently developed with a vacant warehouse building.

There is no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan which applies to the Project. No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located on the Project Site or in the surrounding area.

However, the Project Site does include ornamental trees that could support raptor and/or songbird nests. Migratory nongame native bird species are protected by international treaty under the Federal MBTA of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Environmental impacts from Project implementation may result due to the loss of one onsite tree and one street tree on the western portion of the Project Site. However, the Project would provide a total of 13 new trees on the western portion of the Project Site, including two

new street trees; a net increase of 11 new trees. Compliance with standard regulatory compliance measures would reduce potential impacts upon migratory bird species associated with the proposed tree removals, should construction commence during the breeding season.

The Project would not eliminate important examples of the major periods of California history or prehistory. As discussed in Section 4.5, *Cultural Resources*, there would be no direct or indirect impacts to historical resources.

With Project's incorporation of MM-CUL-1 and RCM-CR-1, potentially significant unforeseen impacts to archaeological resources would be reduced a less than significant. Impacts to human remains would be less than significant with adherence to applicable conditions of approval and RCM-CR-2.

As discussed in Section 4.7, *Geology and Soils*, based on the results of the Paleontological Resources Assessment it was determined that the Project Site has a potential to encounter paleontological resources and could have a potentially significant impact. However, with the Project's incorporation of the MM-GEO-1, MM-GEO-2, MM-GEO-3, MM-GEO-4, and MM GEO-5, the Project would result in less than significant unforeseen impacts to paleontological resources. These Mitigation Measures would reduce potentially significant unforeseen impacts to paleontological resources to a less than significant level.

Overall, based on the preceding analysis of potential impacts, no evidence is presented that the Project would degrade the quality of the environment.

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)?

Less Than Significant Impact. CEQA requires that the analysis of potential project impacts include cumulative impacts. CEQA defines cumulative impacts as "two or more individual effects which, when considered together are considerable or which compound or increase other environmental impacts." [191] This analysis of cumulative impacts need not be as in-depth as the analysis of the Project's impacts, but instead is to "be guided by the standards of practicality and reasonableness."[192] As listed in **Table 38** and **Figure 24** the City identified 15 related projects within an approximately 0.5-mile radius of the Project Site.

The cumulative analyses for each environmental issue are provided following the assessments of Project impacts. The related projects are utilized to analyze cumulative impacts associated with project implementation discussed above. As described above, due to the distance of most of the related projects from the Project Site and the physical conditions in the vicinity of the Project Site, and with the incorporation of the regulatory compliance measures and mitigation measures previously identified in this IS/MND, the Project would not have impacts that are individually limited but cumulatively considerable. Therefore, cumulative impacts would be less than significant.

[191] State CEQA Guidelines, 14 California Code of Regulations, § 15355, et seq.
[192] Ibid

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

Less Than Significant Impact. Based on the analyses presented in this IS/MND, with the incorporation of the mitigation measures identified in this IS/MND, the Project's environmental impacts would be less than significant. Therefore, the Project would not have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly, and the impacts would be less than significant.

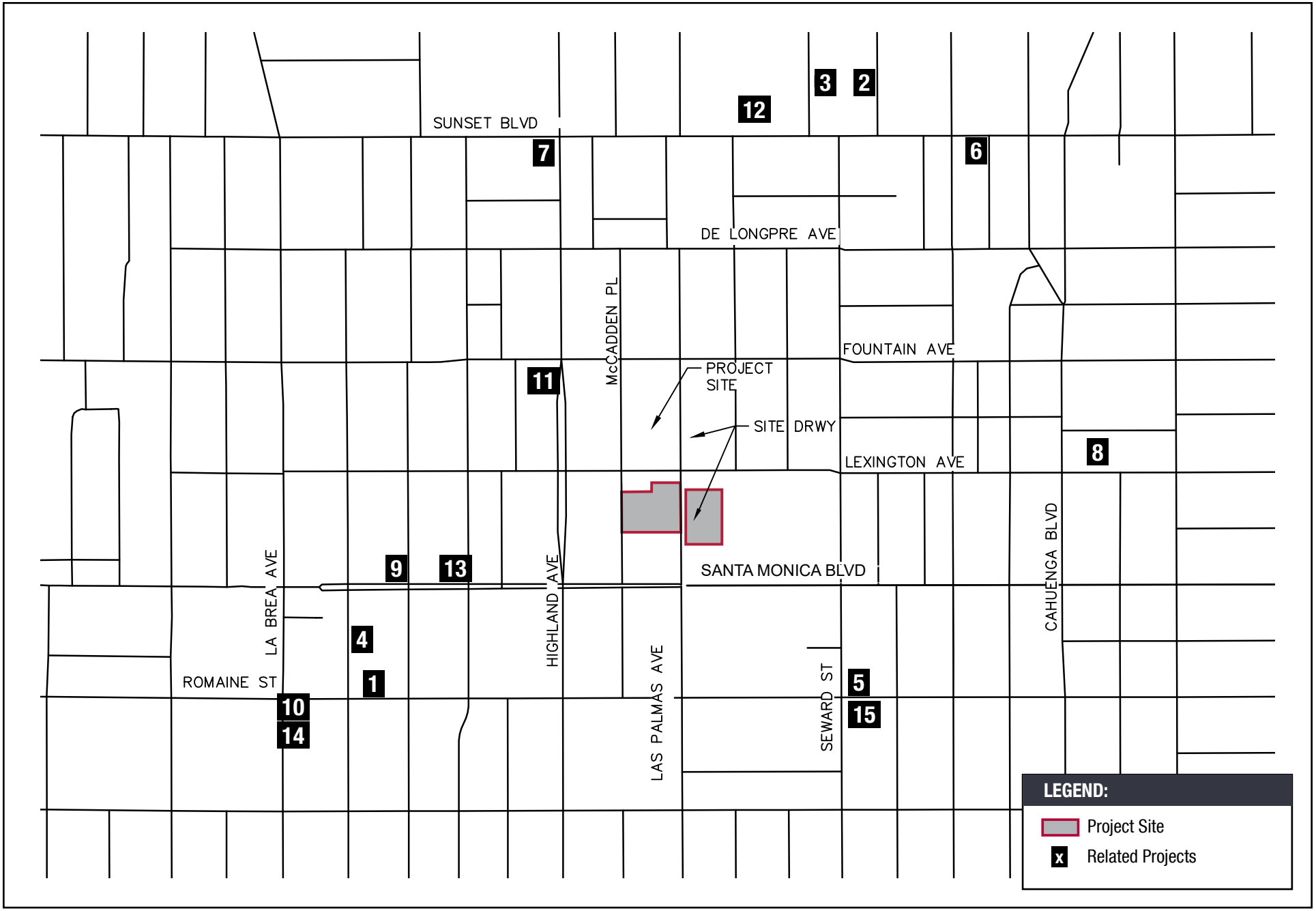

FIGURE 24: Related Projects Map
1151 Las Palmas

Kimley»Horn

Table 38: Related Projects List

Map No.	Project Name	Address	Description
1	7007 W Romaine Mu	7007 W Romaine St	28,486 SF Media Office & 4,694 SF Restaurant
2	Cd 13 Schrader Temp Bridge Housing Shelter	1533 N Schrader Blvd	70-Bed Shelter
3	Mixed-Use	1524 N Cassil Place	138 Apts, 60 Rm Hotel, 1400 Sf Retail
4	926 Sycamore Office	926 N Sycamore Avenue	70,742 Sf Media Production Office Building
5	Mixed-Use Project	1000 N Seward St	136.2 Ksf Office, 2.2 Ksf Restaurant, 2.2 Ksf Retail
6	Sunset + Wilcox MU	6450 W Sunset Blvd	Mu: 431.032ksf Office, 12.386ksf Restaurant
7	Fast Food with Drive-through	6800 W Sunset Blvd	2129 SF Fast-Food with Drive-Through
8	Creative Offices	1200 N Cahuenga Blvd	Commercial Use - 75,362 Sf Creative Offices Total, 500sf Retail
9	Tesla Santa Monica Project	7001 W Santa Monica Blvd	34 Charging/Parking Spaces, 4440 Sf Café
10	Mixed Use -Office/Retail	936 N La Brea Ave	88750 Sf Office & 12000 Retail (In Construction)
11	Mixed-Use	1233 N Highland Ave	72 Apartments
12	Crossroads Hollywood	6701 W Sunset Blvd	Crossroads Hollywood Mixed-Use Project
13	6901 Santa Monica MU	6901 W Santa Monica Blvd	In Construction; 231 Apts, 5KSF Restaurant, 10KSF Retail
14	1UP Fitness	960 N La Brea Avenue	58,417 SSF Fitness Center
15	Seward St Office Project	956 N Seward St	130,000 Gsf Office

Source: LADOT September 19th, 2022

MITIGATION MONITORING PROGRAM

A. INTRODUCTION

This Mitigation Monitoring Program (MMP), which is provided below, has been prepared pursuant to Public Resources Code Section 21081.6 which requires adoption of a MMP for projects in which the Lead Agency has required changes or adopted mitigation to avoid significant environmental effects. The City of Los Angeles is the Lead Agency for the proposed Mitigated Negative Declaration (MND) prepared for the 1151 N. Las Palmas Avenue Project (the Project). The City is responsible for administering and implementing the MMP. The primary purpose of the MMP is to ensure that the mitigation measures identified in the MND are implemented, thereby minimizing identified environmental effects. The MMP also includes the proposed Project Design Features (PDFs). The PDFs are specific design elements proposed by the Applicant that have been incorporated into the Project to prevent the occurrence of or to minimize the significance of potential environmental effects. Because PDFs have been incorporated into the Project, they do not constitute mitigation measures, as defined by Section 15126.4 of the State CEQA Guidelines (Title 14 of the California Code of Regulations). However, PDFs are included in this MMP to ensure their implementation as a part of the Project.

This MMP shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each project design feature and mitigation measure and shall be obligated to provide certification, as identified below, to the appropriate monitoring agency and the appropriate enforcement agency that each project design feature and mitigation measures has been implemented. The Applicant shall maintain records demonstrating compliance with each project design feature and mitigation measure. Such records shall be made available to the City upon request. Further, specifically during the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of project design features and mitigation measures during construction activities consistent with the monitoring phase and frequency set forth in this MMP. The Construction Monitor shall also prepare documentation of the Applicant's compliance with the project design features and mitigation measures during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Annual Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the mitigation measures and project design features within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

As shown on the following pages, each required mitigation measure and proposed PDF for the Project is listed and categorized by impact area, with an accompanying identification of the following:

- **Enforcement Agency:** The agency with the power to enforce the Mitigation Measure/Project Design Feature.
- **Monitoring Agency:** The agency to which reports involving feasibility, compliance, implementation and development are made.
- **Monitoring Phase:** The phase of the Project during which the Mitigation Measure/Project Design Feature shall be monitored.
- **Monitoring Frequency:** The frequency at which the Mitigation Measure/Project Design Feature shall be monitored.
- **Action Indicating Compliance:** The action of which the Enforcement or Monitoring Agency indicates that compliance with the required Mitigation Measure/Project Design Feature has been implemented.

B. PROJECT DESIGN FEATURES AND MITIGATION MEASURES

Aesthetics/Visual Resources

Project Design Features

No project design features are required for Aesthetics/Visual Resources

Mitigation Measures

No mitigation measures are required for Aesthetics/Visual Resources.

Agricultural and Forest Resources

Project Design Features

No Project Design Features are required for Agricultural and Forest Resources.

Mitigation Measures

No mitigation measures are required for Agricultural and Forest Resources.

Air Quality

PDF AQ-1 **Off-Road Diesel-Powered Construction Equipment.** All off-road diesel-powered construction equipment greater than 90 horsepower would meet California Air Resources Board Tier 4 Final off-road emissions standards. Requirements for Tier 4 Final equipment will be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's Best Available Control Technology (BACT) documentation (certified tier specification or

model year specification), and CARB or SCAQMD operating permit (if applicable) will be provided to the City at the time of mobilization of each applicable unit of equipment.

Monitoring Agency: Los Angeles Department of Building and Safety; Los Angeles Department of City Planning

Monitoring Phase: Pre-Construction; Construction

Monitoring Frequency: Periodic field inspections during construction

Action Indicating Compliance: Field inspection sign-off; Compliance certification report by Project contractor

PDF AQ-2: Off-Road Forklifts. All forklifts would be non-diesel forklifts. This requirement will be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment.

Monitoring Agency: Los Angeles Department of Building and Safety; Los Angeles Department of City Planning

Monitoring Phase: Pre-Construction; Construction

Monitoring Frequency: Periodic field inspections during construction.

Action Indicating Compliance: Field inspection sign-off; Compliance certification report by Project contractor.

Mitigation Measures

No mitigation measures are required for Air Quality.

Biological Resources

Project Design Features

No Project Design Features are proposed for Biological Resources.

Mitigation Measures

No mitigation measures are required for Biological Resources.

Cultural Resources

Project Design Features

No Project Design Features are proposed for Cultural Resources.

Mitigation Measures

Mitigation Measure-CUL-1: All construction personnel shall be trained regarding the recognition of cultural resources and protection of all cultural resources. This training shall take place before the initiation of ground-disturbing activities. Training shall inform all construction personnel of the procedures to be followed upon the discovery of cultural resources, general cultural items, including the prehistoric and historic use of the area, as well as pictures of typical cultural resources that can be found during construction. This training should stress applicable state, federal, and local laws, and include information on what to do in case an unanticipated discovery is made by a worker. All construction personnel should be instructed to stop work within a 100-foot radius of the find and immediately inform their field supervisor upon any discovery in the Project Area.

Enforcement Agency: Los Angeles Department of City Planning; Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction

Monitoring Frequency: Once prior to issuance of building permits for program approval.

Action Indicating Compliance: If applicable, report submitted by qualified archaeologist.

Energy

Project Design Features

No Project Design Features are proposed for Energy.

Mitigation Measures

No Mitigation Measures are proposed for Energy.

Geology and Soils

Project Design Features

No Project Design Features are proposed for Geology and Soils.

Mitigation Measures

Mitigation Measure GEO-1: Full-time paleontological monitoring during ground-disturbing activities within the late Pleistocene-age elevated and dissected alluvium (Qae). A Paleontological Monitor is a paleontologist who has a minimum of a bachelor's or equivalent degree in geology or paleontology and no less than one year of experience performing paleontological monitoring and salvaging fossil materials in the relevant geologic province; or an equivalent degree in biology or pursuit of a degree in geology or paleontology and no less than two years of comparable experience

Enforcement Agency: Los Angeles Department of City Planning; Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction, Construction

Monitoring Frequency: Once prior to issuance of building permits for program approval; Periodic during excavation.

Action Indicating Compliance: Issuance of grading permit and final monitoring and mitigation report submitted by qualified paleontologist.

Mitigation Measure GEO-2: If a probable paleontological resource is uncovered during earthwork or construction, all work shall cease within a minimum distance of 50 feet from the find until a Qualified Paleontologist has been retained to evaluate the find in accordance with the Society of Vertebrate Paleontology's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Temporary flagging shall be installed around the find in order to avoid any disturbance from construction equipment. Any paleontological materials that are uncovered shall not be moved or collected by anyone other than a Qualified Paleontologist or his/her designated representative such as a Paleontological Monitor. If cleared by the Qualified Paleontologist, Ground Disturbance

Activities may continue unimpeded on other portions of the site. The found deposit(s) shall be treated in accordance with the Society of Vertebrate Paleontology's Standard Procedures. Ground Disturbance Activities in the area where resource(s) were found may recommence once the identified resources are properly assessed and processed by the Qualified Paleontologist. A report that describes the resource and its disposition, as well as the assessment methodology, shall be prepared by the Qualified Paleontologist according to current professional standards and maintained for a minimum of five years after the Certificate of Occupancy is issued. If appropriate, the report should also contain the Qualified Paleontologist's recommendations for the preservation, conservation, and curation of the resource at a suitable repository, such as the Natural History Museum of Los Angeles County, with which the Applicant or Owner must comply.

A Qualified Paleontologist is a paleontologist who meets the Society of Vertebrate Paleontology standards for a Principal Investigator or Project Paleontologist; has demonstrated competence in field techniques, preparation, identification, curation, and reporting and/or a graduate degree in paleontology or geology or a publication record in peer reviewed journals; at least two years professional experience with administration and project management experience; proficiency in recognizing fossils in the field and determining their significance; expertise in local geology, stratigraphy, and biostratigraphy; and experience collecting vertebrate fossils in the field."

Enforcement Agency: Los Angeles Department of City Planning; Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction, Construction

Monitoring Frequency: Once prior to issuance of building permits for program approval; Periodic during excavation

Action Indicating Compliance: Issuance of grading permit and development of Inadvertent Discovery Plan and if applicable, fossil collection and curation report submitted by qualified paleontologist.

Mitigation Measure GEO-3: Any recovered fossil remains will be prepared and identified to the lowest taxonomic level possible by knowledgeable paleontologists. Significant remains then will be transferred to a fossil repository for curation.

Enforcement Agency: Los Angeles Department of City Planning; Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction, Construction

Monitoring Frequency: Once prior to issuance of building permits for program approval; Periodic during excavation

Action Indicating Compliance: If applicable, report submitted by qualified paleontologist.

Mitigation Measure GEO-4: A qualified paleontologist shall prepare a report of findings made during all site grading activity with an appended itemized list of fossil specimens recovered during grading (if any).

Enforcement Agency: Los Angeles Department of City Planning; Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction, Construction

Monitoring Frequency: Once prior to issuance of building permits for program approval; Periodic during excavation

Action Indicating Compliance: Report of findings submitted by qualified paleontologist.

Mitigation Measure GEO-5: Prior to the start of any ground-disturbing activities, a preconstruction meeting shall take place during which the qualified paleontologist shall provide all construction personnel with paleontological sensitivity training via a Worker Environmental Awareness Program (WEAP). This training program will provide information regarding the potential to encounter subsurficial paleontological resources during installation of Auger Pressure Grouted Displacement (AGPD) piles and the need to protect such resources. The training will inform construction personnel of the location(s) and boundaries of any areas with a high paleontological resource potential. Instruction will be provided as to the appropriate procedures

and notifications to be undergone should paleontological resources be discovered during Project construction. The training will also emphasize that unauthorized collections or disturbances of protected fossils on or off the Project area are prohibited and may result in criminal penalties and fines. The qualified paleontologist or qualified paleontological monitor may attend tailgate meetings to brief the construction crew on paleontological monitoring protocols.

Enforcement Agency: Los Angeles Department of City Planning; Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction

Monitoring Frequency: Once prior to issuance of building permits for program approval.

Action Indicating Compliance: If applicable, report submitted by qualified paleontologist.

Greenhouse Gas Emissions

Project Design Features

PDF GHG-1: The Project would be an all-electric development that would not require new connections to natural gas.

Enforcement Agency: Los Angeles Department of City Planning; Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction

Monitoring Frequency: Once prior to issuance of building permits.

Action Indicating Compliance: Field inspection survey.

Mitigation Measures

No Mitigation Measures are proposed for Greenhouse Gas Emissions.

Hazards and Hazardous Materials

Project Design Features

No Project Design Features are proposed for Hazards and Hazardous Materials.

Mitigation Measures

No mitigation measures are required for Hazards and Hazardous Materials.

Hydrology and Water Quality

Project Design Features

No Project Design Features are proposed for Hydrology and Water Quality.

Mitigation Measures

No mitigation measures are required for Hydrology and Water Quality.

Land Use and Planning

Project Design Features

No Project Design Features are proposed for Land Use.

Mitigation Measures

No mitigation measures are required for Land Use.

Mineral Resources

Project Design Features

No Project Design Features are proposed for Mineral Resources.

Mitigation Measures

No mitigation measures are required for Mineral Resources

Noise and Vibration

Project Design Features

PDF NOISE-1:	Amplified Sound Systems. Amplified sound systems would not be installed or used at any of the outdoor spaces
Enforcement Agency:	Los Angeles Department of Building and Safety
Monitoring Agency	Los Angeles Department of Building and Safety
Monitoring Phase:	Construction
Monitoring Frequency:	Periodic field inspections during construction.

Action Indicating Compliance: Field inspection sign-off; Compliance certification report by Project contractor.

Mitigation Measures

No mitigation measures are required for Noise and Vibration.

Population and Housing

Project Design Features

No Project Design Features are proposed for Population and Housing.

Mitigation Measures

No mitigation measures are required for Population and Housing.

Public Services

Project Design Features

PDF-PS-1: A construction fence shall be constructed around the Project Site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspections during construction.

Action Indicating Compliance: Field inspection sign-off; Compliance certification report by Project contractor.

PDF-PS-2: Prior to the occupancy of the Project, the Applicant shall provide Hollywood Community Police Station with a diagram of each portion of the property, including access routes, and additional information to facilitate potential LAPD responses.

Enforcement Agency: Los Angeles Police Department

Monitoring Agency: Los Angeles Police Department

Monitoring Phase: Construction

Monitoring Frequency: Once, prior to certificate of occupancy.

Action Indicating Compliance: Sign-off on LAPD reviewed diagrams; Certificate of Occupancy.

Mitigation Measures

No mitigation measures are required for Public Services

Parks and Recreation

Project Design Features

No Project Design Features are proposed for Parks and Recreation.

Mitigation Measures

No mitigation measures are required for Parks and Recreation.

Transportation

Project Design Features

PDF TRAF-1: Promotions and Marketing:

The Project would provide marketing and promotional tools to educate and inform employees about site specific transportation options and effects of their travel choices and opportunities to alter their habits through the office employers. It is assumed that 100 percent of employees would be eligible to be involved with a promotions and marketing program, allowing for the full 4% VMT reduction.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: Annual

Monitoring Frequency: Certificate of Occupancy

PDF TRAF-2 Reduced Parking Supply:

Pursuant to City Ordinance No. 185,480 (Bicycle Parking Ordinance), new or existing code-required vehicle parking spaces for all uses may be replaced by bicycle parking at a ratio of one vehicle space for every four bicycle spaces. Based on LAMC, the project would typically require 219 vehicle parking

spaces. Per City Ordinance No. 185, the project would provide 213 vehicle parking spaces, six (6) fewer than the LAMC requirement.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: Once, prior to certificate of occupancy.

Monitoring Frequency: Certificate of Occupancy.

PDF TRAF-3 Bicycle Parking and Amenities:

The project would provide 26 short-and long-term bicycle parking spaces, (i.e., 26 bicycle parking spaces consisting of 9 short-term and 17 long-term spaces), and amenities such as shower/changing facilities.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: A Once, prior to certificate of occupancy.

Monitoring Frequency: Certificate of Occupancy.

PDF TRAF-4: Construction Management Plan

The contractor would develop Construction Management Plan as part of the Project and submit it to the City of Los Angeles for approval to reduce the Project's potential construction impacts. The Construction Management Plan would include the following:

- Coordinate with the City to ensure adequate access to the Project Site and land uses in proximity of the Project site is maintained.
- Pick-ups and deliveries of construction materials should be scheduled off-peak hours to the extent possible.
- Reduce the potential of trucks waiting for extended periods to load or unload.
- Construction truck contractor should provide off-site staging in a legal area.
- Determine the number and location of flag men required during traffic rerouting and deliveries.
- Contractor to post construction notices/hotlines at several locations on the Project Site.

- Establish requirements for storage of materials and loading/unloading on the Project Site.
- Worksite traffic control plans approved by the City of Los Angeles should be implemented to route vehicles, bicyclist, and pedestrians around the area during any parking, travel lane or sidewalk closures.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: Pre-construction; Construction

Monitoring Frequency: Once prior to issuance of Building Permit; Periodic field inspections during construction

Action Indicating Compliance:

Approval of Construction Traffic Management Plan from the Los Angeles Department of Transportation prior to issuance of Building Permit (Pre-construction); compliance certification report submitted by Project contractor (Construction)

Mitigation Measures

MM TRAF-1 Rideshare Program:

The Project would provide either designated parking spaces and loading zones for ridesharing vehicles and/or an internal website or program to coordinate rides. The rideshare program would be implemented through the office employers. It is assumed that 100 percent of employees would be eligible to be involved with a ridesharing program, allowing for the full 15% VMT reduction.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: Annual

Monitoring Frequency: Certificate of Occupancy

Tribal Cultural Resources

Project Design Features

No project design features are required for Tribal Cultural Resources

Mitigation Measures

No mitigation measures are required for Tribal Cultural Resources

Utilities and Service Systems

Project Design Features

No project design features are required for Utilities and Service Systems

Mitigation Measures

No mitigation measures are required for Utilities and Service Systems

Wildfire

Project Design Features

No project design features are required for Wildfire.

Mitigation Measures

No mitigation measures are required for Wildfire.

In addition, the following Regulatory Compliance Measures are incorporated into the Project to avoid significant environmental effects:

Regulatory Compliance Measures

Biological Resources

RCM-BIO-1: Tree Removal (Public Right-of-Way). Removal of trees in the public right-of way requires approval by the Board of Public Works. The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works. Per Section 62.177 of the LAMC, the Applicant shall pay an in-lieu tree replacement fee for any trees removed in the public right-of-way that cannot be replaced on site.

RCM-BIO-2: Proposed Project activities (including disturbances to native and non-native vegetation, structures, and substrates) should take place outside of the breeding bird season

which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code Section 86).

If Project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:

- Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
- If a protected native bird is found, the applicant shall delay all clearance/ construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31.
- Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.
- The Applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the Project.

Cultural Resources

RCM-CR-1. In the event that any subsurface cultural resources are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5. At which time the applicant shall notify the City and consult with a qualified archaeologist who shall evaluate the find in accordance with Federal, State, and local guidelines, including those set forth in the California Public Resources Code Section to PRC Section 21083.2 and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be

unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

RCM-CR-2 In the event that human skeletal remains are encountered at the project site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event human skeletal remains are discovered during construction or during any ground disturbance actives, the following procedures shall be followed:

- Stop immediately and contact the County Coroner:

  1104 N. Mission Road
  Los Angeles, CA 90033
  323) 343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
  (323) 343-0714 (After Hours, Saturday, Sunday, and Holidays)

- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.