



Sunset + Wilcox Project

Case Number: ENV-2020-1930-EIR

Project Location: 1440, 1420, 1424, 1426, 1428, 1432, 1432½, 1434, 1436, 1438, 1450, 1452, and 1454 North Wilcox Avenue; 6450, 6460, and 6462 West Sunset Boulevard; 1413, 1417, 1419, 1425, 1427, 1433, 1435, 1439, 1441, 1443, 1445, and 1447 North Cole Place; and, 6503 De Longpre Avenue, Los Angeles, California 90028. (Project Site)

Community Plan Area: Hollywood

Council District: 13—O'Farrell

Project Description: The Project is a new commercial development containing office and restaurant uses proposed on an approximately 74,193-square-foot (1.70-acre) site located in the Hollywood Community Plan Area of the City of Los Angeles (City). The Project Site is currently occupied with approximately 26,261 square feet of office and retail uses and associated surface parking. The Project includes the development of a 15-story commercial building with a total floor area of 443,418 square feet consisting of 431,032 square feet of office space and 12,386 square feet of ground floor restaurant space. As detailed in Section 3, Project Description, for conservative purposes, this Initial Study assumes a total floor area of 445,218 square feet, including 431,032 square feet of office space and 14,186 square feet of restaurant space. The Project also includes the construction of an 18-foot-tall, 3,550-square-foot building to house Los Angeles Department of Water and Power (LADWP) equipment and an underground generator. The area proposed for this use would not constitute floor area as defined by Los Angeles Municipal Code (LAMC) Section 12.03. As part of the Project, the existing uses would be demolished. Upon completion, the Project would result in a net floor area of 418,957 square feet and a floor area ratio (FAR) of 6:1. The Project would include a total of 1,291 vehicular parking spaces, including 1,286 vehicular parking spaces for the proposed office and retail/restaurant uses and five vehicular parking spaces adjacent to the LADWP building. The Project would provide a variety of open space areas totaling 61,449 square feet, of which 32,077 square feet would comply with LAMC Open Space requirements. Because there are no residential uses proposed, open space is not required for the Project. Additionally, as proposed, the Project signage would comply with Hollywood Signage Supplemental Use District regulations.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

Eyestone Environmental, LLC

APPLICANT:

6450 Sunset Owner, LLC

December 2020

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1 INTRODUCTION

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

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

1.1 PURPOSE OF AN INITIAL STUDY

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

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

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

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1. INTRODUCTION

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

2. EXECUTIVE SUMMARY

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

3. PROJECT DESCRIPTION

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

4. EVALUATION OF ENVIRONMENTAL IMPACTS

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

1.3 CEQA PROCESS

Below is a general overview of the CEQA process. The CEQA process is guided by the CEQA statutes and guidelines, which can be found on the State of California's website (<http://resources.ca.gov/ceqa>).

1.3.1 Initial Study

At the onset of the environmental review process, the City has prepared this Initial Study to determine if the Project may have a significant effect on the environment. This Initial Study has determined that the Project may have a significant effect(s) on the environment and an EIR will be prepared.

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

1.3.2 Draft EIR

Once the Draft EIR is complete, a Notice of Completion and Availability is prepared to inform public agencies and the general public of the availability of the document and the locations where the document

can be reviewed. The Draft EIR and Notice of Availability are circulated for a 45-day review and comment period. The purpose of this review and comment period is to provide public agencies and the general public an opportunity to review the Draft EIR and comment on the adequacy of the document, including the analysis of environmental effects, the mitigation measures presented to reduce potentially significant impacts, and the alternatives analysis. After the close of the 45-day review and comment period, responses to all comments on environmental issues received during the comment period are prepared.

1.3.3 Final EIR

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

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

2 EXECUTIVE SUMMARY

PROJECT TITLE	Sunset + Wilcox Project
ENVIRONMENTAL CASE NO.	ENV-2020-1930
RELATED CASES	CPC-2020-1929-HD-VCU-MCUP-SPR-RDP-WDI / VTT-83088

PROJECT LOCATION	1440, 1420, 1424, 1426, 1428, 1432, 1432 ½, 1434, 1436, 1438, 1450, 1452, and 1454 North Wilcox Avenue; 6450, 6460, and 6462 West Sunset Boulevard; 1413, 1417, 1419, 1425, 1427, 1433, 1435, 1439, 1441, 1443, 1445, and 1447 North Cole Place; and, 6503 De Longpre Avenue, Los Angeles, California 90028
COMMUNITY PLAN AREA	Hollywood
GENERAL PLAN DESIGNATION	Regional Center Commercial
ZONING	C4-2D-SN, C4-2D, C2-1XL
COUNCIL DISTRICT	13—O'Farrell

LEAD AGENCY	City of Los Angeles
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	Bradley Furuya
ADDRESS	221 North Figueroa Street, Suite 1350, Los Angeles, CA 90012
PHONE NUMBER	213-847-3642
EMAIL	bradley.furuya@lacity.org

APPLICANT	6450 Sunset Owner, LLC
ADDRESS	235 Montgomery Street, 16th Floor, San Francisco, CA 94104
PHONE NUMBER	(213) 229-9548

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

On the basis of this initial evaluation:

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

EVALUATION OF ENVIRONMENTAL IMPACTS

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

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Sunset + Wilcox Project (Project) is a new commercial development containing office and restaurant uses proposed on an approximately 74,193-square-foot (1.70-acre)² site located at 1440, 1420, 1424, 1426, 1428, 1432, 1432½, 1434, 1436, 1438, 1450, 1452, and 1454 North Wilcox Avenue; 6450, 6460, and 6462 West Sunset Boulevard; 1413, 1417, 1419, 1425, 1427, 1433, 1435, 1439, 1441, 1443, 1445, and 1447 North Cole Place; and, 6503 De Longpre Avenue (Project Site) in the Hollywood Community Plan Area of the City of Los Angeles (City). The Project Site is currently occupied with approximately 26,261 square feet of office and retail uses and associated surface parking. The Project includes the development of a 15-story commercial building with a total floor area of 443,418 square feet consisting of 431,032 square feet of office space and 12,386 square feet of ground floor restaurant space. However, as detailed below in Section 3.3.1, Project Overview, for conservative environmental analysis purposes, this Initial Study assumes the outdoor dining areas adjacent to the ground floor commercial space would count as floor area, resulting in a total floor area of 445,218 square feet, including 431,032 square feet of office space and 14,186 square feet of restaurant space. The Project also includes the construction of an 18-foot-tall, 3,550-square-foot building to house Los Angeles Department of Water and Power (LADWP) equipment and an underground generator. The area proposed for this use would not constitute floor area as defined by Los Angeles Municipal Code (LAMC) Section 12.03. As part of the Project, the existing office and retail uses and associated surface parking would be demolished. Upon completion, the Project would result in a net floor area of 418,957 square feet on the Project Site, under a conservative analysis, and a floor area ratio (FAR) of 6:1.

The Project would provide a total of 1,291 vehicular parking spaces, including 1,286 vehicular parking spaces for the proposed office and restaurant uses and five vehicular parking spaces adjacent to the LADWP equipment building. Parking for the office and restaurant uses would be provided within three subterranean levels, at-grade parking, a small parking mezzanine, and two full floor fully-enclosed, mechanically ventilated above-grade levels. The five additional vehicular parking spaces would be provided in a small surface parking area adjacent to the LADWP equipment building. The Project would provide a variety of open space areas totaling 61,449 square feet of which 32,077 square feet would comply with LAMC Open Space requirements. Because there are no residential uses proposed, open space is not required for the Project.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site consists of 10 contiguous lots at 1440, 1420, 1424, 1426, 1428, 1432, 1432 ½, 1434, 1436, 1438, 1450, 1452, and 1454 North Wilcox Avenue; 6450, 6460, and 6462 West Sunset Boulevard; 1413, 1417, 1419, 1425, 1427, 1433, 1435, 1439, 1441, 1443, 1445, and 1447 North Cole Place; and,

² The Project includes a 2,275-square-foot merger of the public right-of-way along a portion of Wilcox Avenue. The Project Site includes the site area prior to the merger (71,918 square feet) plus the 2,275-square-foot merger.

6503 De Longpre Avenue, Los Angeles, California 90028 in the Hollywood Community Plan Area of the City. As shown in Figure 1 on page 9 and in Figure 2 on page 10, the Project Site is bound by Sunset Boulevard to the north, Cole Place to the east, De Longpre Avenue to the south, and Wilcox Avenue to the west.

Regional access to the Project Site is provided by the US-101, located less than 1 mile from the Project Site. Local access to the Project Site is provided by several local streets and avenues, including Sunset Boulevard and Wilcox Avenue. The Project Site is also well served by a variety of public transit options, including local and regional bus lines, subway stations, and regional rail service. In particular, the Project Site is located approximately 0.5 mile from the Los Angeles County Metropolitan Transit Authority (Metro) B Line Hollywood/Vine Station and immediately adjacent to the Metro 2 Local Line on Sunset Boulevard.

3.2.2 Existing Conditions

As shown in Figure 3 on page 11, the Project Site is currently developed with three buildings and surface parking. The existing buildings on the Project Site comprise approximately 26,261 square feet of floor area consisting of a one-story, 16,932-square-foot commercial building along Sunset Boulevard and Wilcox Street/Cole Place, a one-story, 4,446-square-foot commercial office building along Wilcox Street, and a two-story, 4,883-square-foot commercial office building along Cole Place and De Longpre Avenue. Vehicular access to the parking areas of the Project Site is provided via curb cuts and driveways located on Wilcox Avenue and Cole Place. Pedestrian access to the Project Site is provided via sidewalks located along the perimeter of the Project Site. The Project Site is relatively flat with limited ornamental landscaping.

The Project Site is located within the Hollywood Community Plan area. The Project Site has a Regional Center Commercial General Plan Land Use designation with the corresponding zones of C4-2D-SN (Commercial Zone, Height District 2 with Development Limitation, Hollywood Signage Supplemental Use District), C4-2D (Commercial Zone, Height District 2 with Development Limitation), and C2-1XL (Commercial Zone, Height District 1XL). The C2 and C4 zones allow for a wide variety of land uses, including retail stores, offices, restaurants, theaters, hotels, broadcasting studios, parking buildings, parks, and playgrounds. These zones also permit any land use permitted in the R4 zone, including multiple residential uses. Height District 2 allows a 6:1 FAR in the Project Site's C4-Zoned portions with no height or story limit. The Project Site is subject to a D Limitation, which limits the Project Site to a 2:1 FAR.³ The D Limitation does not impose any height limits on the Project Site. Height District Number 1XL allows a 1.5:1 FAR in the Project Site's C2-zoned portions with a 30-foot and two-story height limit.

The Project Site is also located within a Transit Priority Area, the Hollywood Redevelopment Area, the Los Angeles State Enterprise Zone, the Hollywood Entertainment District, the Hollywood Signage Supplemental Use District, and within a Tier 3 Transit Oriented Communities (TOC) area.

³ Ordinance No. 165,661, adopted by the Los Angeles City Council on May 7, 1990.

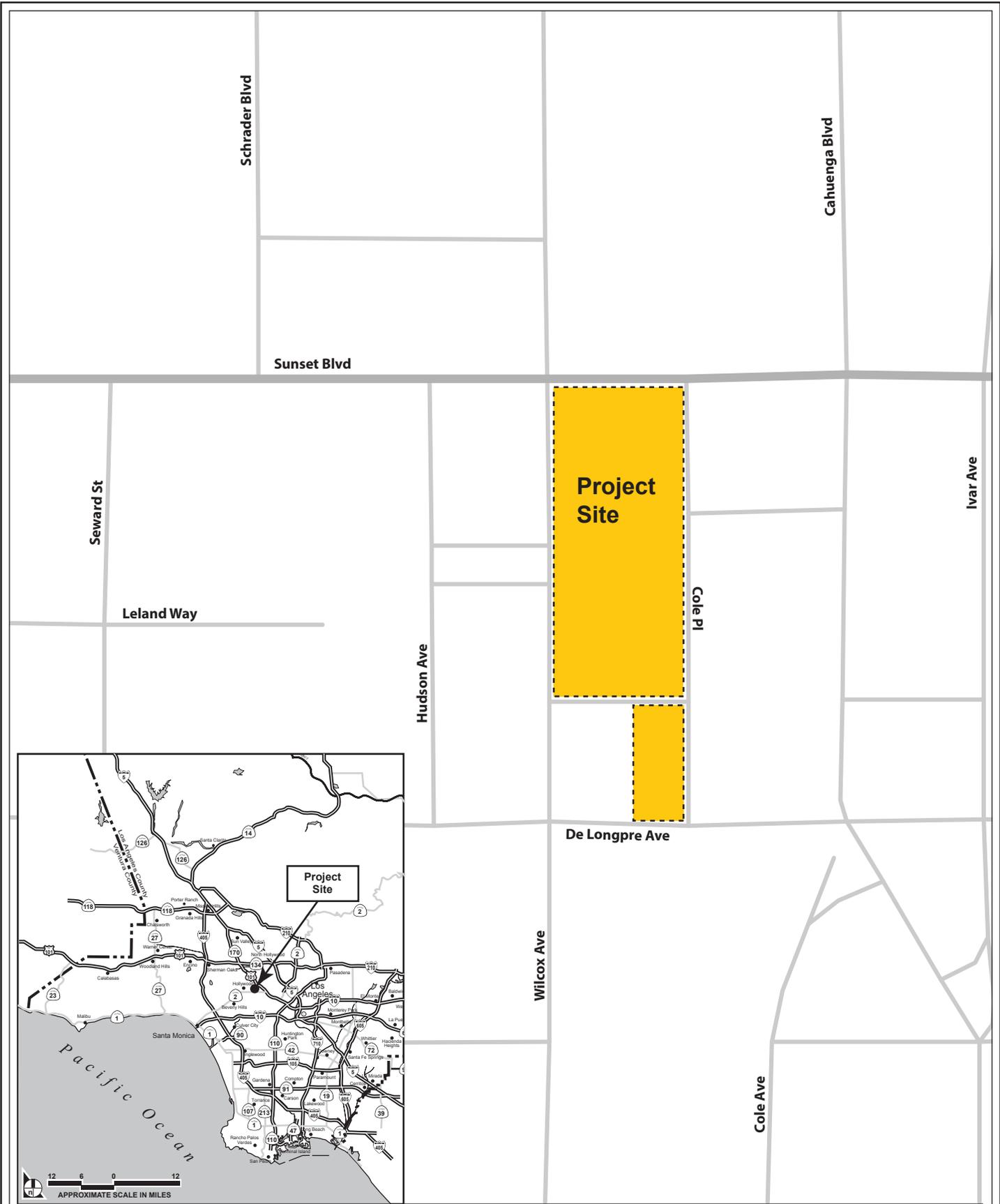


Figure 1
Project Location

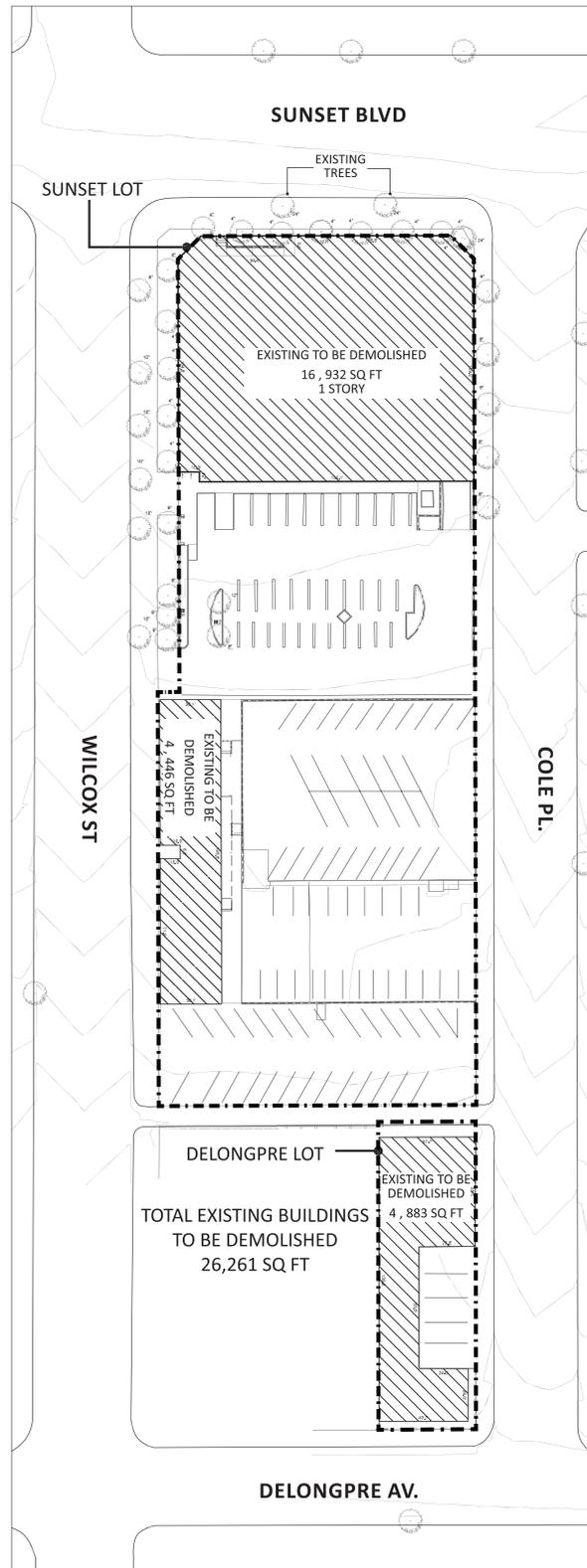


Figure 3
Existing Site Plan

3.2.3 Surrounding Land Uses

The Project Site is within a vibrant commercial area in the Hollywood Community Plan Area. The area surrounding the Project Site is developed primarily with a mix of low- to high-intensity residential, commercial, and mid-rise office buildings, which vary widely in building style and period of construction. Land uses adjacent to the Project Site include the Rise Hollywood mixed-use development, the Los Angeles Police Department Hollywood Station, and Los Angeles Fire Department Station 27 south of the Project Site, the 14-story CNN building east of the Project Site, and an 11-story office building located west of the Project Site. The uses surrounding the Project Site are designated as Regional Center Commercial, Limited Commercial, Low Medium II Residential, and Public Facilities, and have varying zoning designations, including C4-2, C4-2D-SN, C2-1XL, C1-1VL, and RD1.5-1XL.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

As shown in Figure 4 on page 13, the Project includes the construction of a 15-story, 275-foot tall⁴ commercial building with a total floor area of 443,418 square feet consisting of 431,032 square feet of office space and 12,386 square feet ground floor restaurant space. However, approximately 1,800 square feet of outdoor covered patio areas adjacent to the ground floor restaurant space along Sunset Boulevard would not count towards the Project's total floor area pursuant to LAMC Sections 12.03 and 12.21.1-A.5. Nevertheless, to provide a conservative environmental analysis, this Initial Study assumes these aforementioned outdoor dining areas count towards the floor area, resulting in a total floor area of 445,218 square feet, including 431,032 square feet of office space and 14,186 square feet of restaurant space. The Project also includes the construction of a two-story (18-foot), 3,550-square-foot building to house LADWP equipment and an underground generator. The area proposed for the LADWP equipment building would not constitute floor area as defined by the LAMC. As part of the Project, the existing office and retail uses comprising 26,261 square feet and associated surface parking would be removed. Upon completion, the Project would result in a net floor area of 417,157 square feet on the Project Site or 418,957 square feet under a conservative analysis, and a FAR of 6:1.

The Project would provide a total of 1,291 vehicular parking spaces, including 1,286 vehicular parking spaces for the proposed office and restaurant uses and five vehicular parking spaces adjacent to the LADWP equipment building. Parking for the office and restaurant uses would be provided within three subterranean levels, at-grade parking, a small parking mezzanine, and two full floor fully-enclosed, mechanically ventilated above-grade levels. The five additional vehicular parking spaces would be provided in a small surface parking area adjacent to the LADWP equipment building. In addition, the Project would provide a variety of private open space areas totaling 61,449 square feet of which 32,077 square feet would comply with LAMC Open Space requirements. Because there are no residential uses proposed, open space is not required for the Project.

⁴ The building would measure 271 feet to the top of the parapet and 275 feet to the top of the mechanical and penthouse projections.

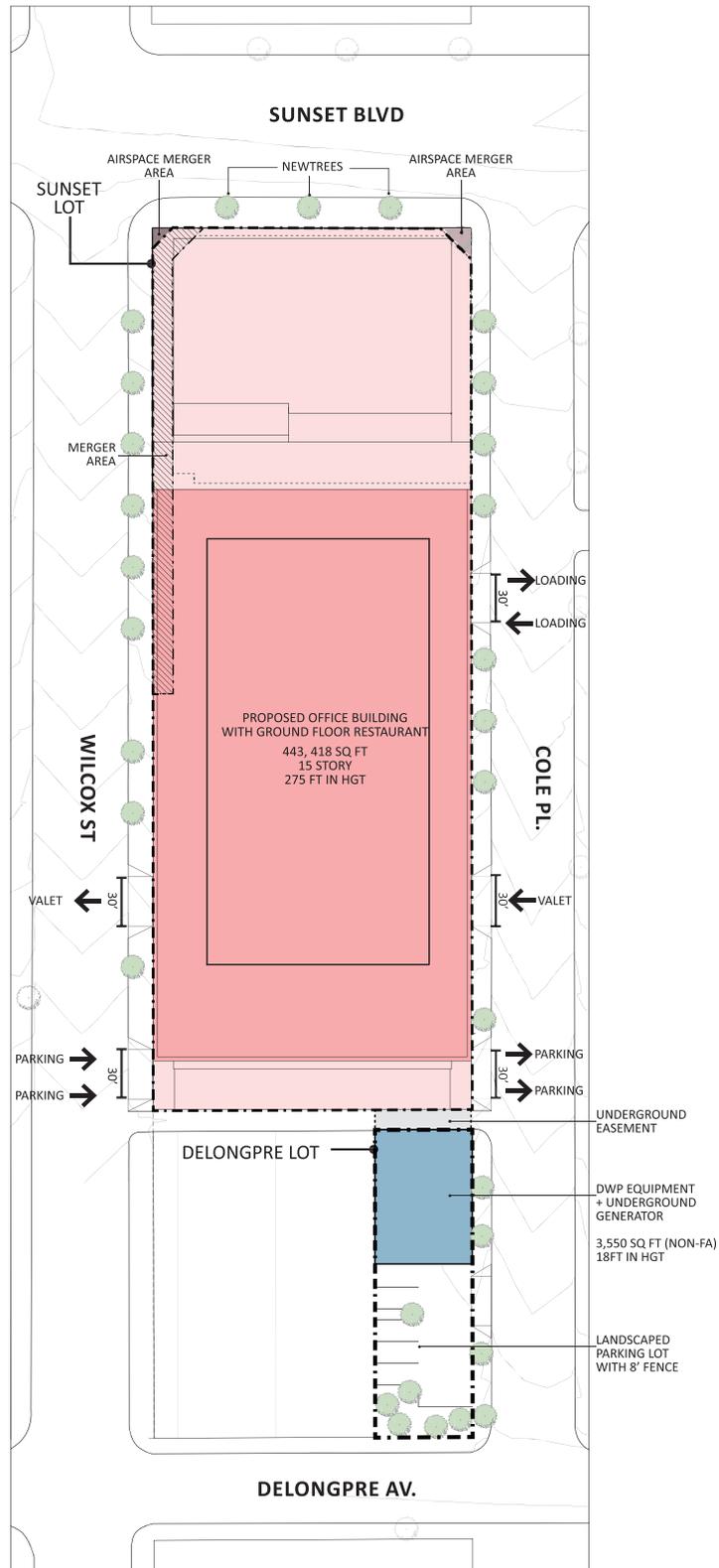


Figure 4
Conceptual Site Plan

3.3.2 Design and Architecture

As illustrated in Figure 5 on page 15, the proposed commercial building would incorporate design elements consistent with other surrounding buildings in Hollywood and would feature a new contemporary glass façade with various repeating rectangle forms, creating a distinctive character. The building would be designed with partially landscaped terraces throughout. To enhance pedestrian activity, the ground floor of the building would include commercial uses consisting of retail and restaurant spaces along the Sunset Boulevard frontage. Also included within the ground floor would be office space, a lobby, ground floor parking, and a loading dock. The Project would include two fully-enclosed, mechanically ventilated above ground parking levels, which would be within a parking podium. The parking podium would consist of the ground floor parking, mezzanine level parking (which is within the height of the ground floor lobby and retail levels), and parking levels two and three. The parking podium would be wrapped in a distinctive, softly luminous material and wood screens, reducing the visibility of the parked cars from the street. The levels above the parking podium would include office spaces and would be designed with partially landscaped terraced levels. As shown in Figure 5, the massing of the building would shift south beginning at level six where 22,020 square feet of landscaped open space surrounding the office space would be provided. The Project would also include a penthouse office suite on level 14 and the mechanical roof on level 15, which would both be treated as a distinctive design element and may include the use of timber.

Also included in the Project is a 3,550-square-foot, 18-foot tall building housing LADWP equipment across the alley within the De Longpre lot. The LADWP equipment building would include a green wall-type screen to visually enhance the building.

3.3.3 Open Space and Landscaping

The Project would include several open space areas consisting of private landscaped outdoor terraces on the various upper levels. The Project would provide 61,449 square feet of private open space, of which 12,290 square feet would be landscaped and 49,159 square feet would be hardscape. As shown in Figure 6 on page 16, the primary open space area of the Project would be a large, 22,020-square-foot landscaped deck located on the sixth level of the commercial building. Of the 61,449 square feet, 32,077 square feet would comply with LAMC Open Space requirements. Because there are no residential uses proposed, open space is not required. Based on the Tree Report included in Appendix IS-1 of this Initial Study, the Project would not involve the removal of any trees considered protected under the City of Los Angeles Native Tree Protection Ordinance either within the Project Site or in the adjacent right-of-way (street trees). To allow for development of the Project, the existing four onsite trees and 12 street trees would be removed in the adjacent right-of-way. Pursuant to the requirements of the City of Los Angeles Urban Forestry Division, the onsite trees to be removed would be replaced at a 1:1 ratio and the street trees to be removed would be replaced at a 2:1 basis.

3.3.4 Access, Circulation, and Parking

Vehicular access to the Project Site would be provided via driveways along Wilcox Avenue and Cole Place. A one-way valet driveway into the Project Site would be located along Cole Place with a corresponding exit driveway located on Wilcox Avenue. This drop-off and pick-up area would include a waiting area for both patrons and tenants utilizing the valet service. A second one-way driveway into the Project Site would be located further south on Wilcox Avenue for both patrons and tenants to drive in and park, with a corresponding exit driveway along Cole Place. Valets would be able to move cars from the

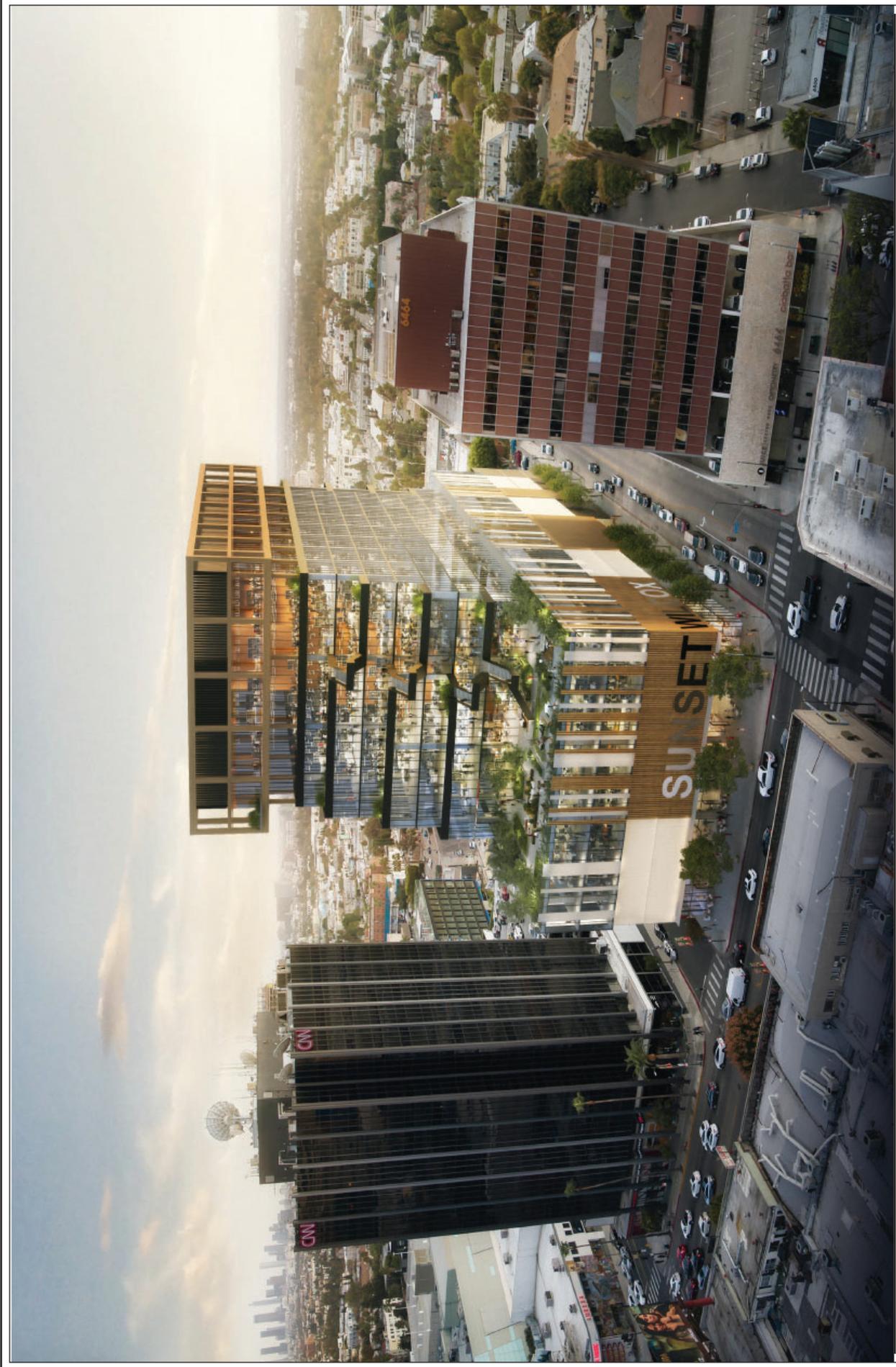


Figure 5
Proposed Rendering

FLOOR PLAN DIAGRAM CAMPUS COMMONS LEVEL 06



Figure 6
Conceptual Landscape/Open Space Plan

valet drop-off to the parking garage and back from the parking garage to the valet pick-up while remaining on-site. The Project also includes a loading zone for loading and trash operations with a tertiary driveway located further north along Cole Place. A fourth driveway is proposed along Cole Place for the surface parking lot outside of the LADWP equipment building. An on-street passenger loading zone for rideshare services is proposed along the east curb of Wilcox Avenue adjacent to the Project Site. The Project Site would be accessible for pedestrians through pedestrian points of entry along Sunset Boulevard and Wilcox Avenue, with bicycle access provided from Cole Place and Wilcox Avenue.

The Project would provide a total of 1,291 vehicular parking spaces, including 1,286 vehicle parking spaces for the proposed office and commercial uses and five vehicular parking spaces adjacent to the LADWP equipment building. Parking for the office and commercial uses would be provided within three subterranean levels, which would extend to a maximum depth of 52 feet, at-grade parking, a small parking mezzanine, and two full floor fully-enclosed, mechanically ventilated above-grade parking levels. The five additional vehicular parking spaces would be provided within a small surface parking area adjacent to the LADWP equipment building. It is noted that the Project Applicant is required to record a covenant against the property to provide up to thirty-five (35) vehicular parking spaces at the Project Site for off-site uses. These spaces, which are already included in the 1,291 total vehicular parking spaces, would be unreserved. In accordance with LAMC requirements, the Project would also provide 143 bicycle parking spaces, including 93 long-term spaces and 50 short-term spaces in a bicycle parking facility within the first floor of the parking garage. The Project would also include other amenities for bicyclists such as showers and a repair facility near the bicycle parking facility. In addition, the Project would comply with City and State requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the parking areas.

The Project Site is conveniently accessible by various transit options, including the Metro B Line Hollywood/Vine Station located approximately 0.5 mile northeast of the Project Site. Local and regional bus lines are also in close proximity to the Project Site with frequent stops and service to various locations throughout the City.

3.3.5 Lighting and Signage

Project lighting would include architecturally-integrated low-level exterior lights on the buildings and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the Project Site. Project lighting would be designed to provide for efficient, effective, and aesthetically pleasing lighting solutions that would minimize light trespass from the Project Site and minimize sky-glow to increase night sky access. All exterior lighting would be dimmable and automatically controlled via occupancy sensors and photo sensors to allow for the appropriate control of nighttime lighting. Interior lighting would be dimmable and controlled to meet all prevailing code requirements, which includes the use of occupancy sensors, multi-scene presets, and timeclock events.

All exterior and interior lighting would meet the requirements of the California Energy Commission Building Energy Efficiency Standards—Title 24, version 2016 and the National Electrical Code (NEC). Light trespass from interior spaces would be limited by blinds and/or drapery or will be installed in such a way as to not create light trespass off of the Project Site. Any new street and/or pedestrian lighting within the public right-of-way would comply with all applicable City regulations and would be approved by the

Bureau of Street Lighting, as required, in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties.

The Project would include retail and building identification signage that would be aesthetically compatible with the proposed architecture of the Project Site. Proposed signage would include general street level tenant/site identification and visitor directional signage as permitted by LAMC. All on-site and off-site signage, including one digital (non-animated) wall sign along the Sunset Boulevard frontage, would fit within the permitted area per each sign type, the combined area of all signs, and the permitted sign location pursuant to the LAMC, the Hollywood Signage Supplemental Use District, and the Hollywood Redevelopment Plan Revised Amended Design for Development for Signs in Hollywood, as applicable.

3.3.6 FAR, Density, and Setbacks

As discussed above, the Project Site is designated as Regional Center Commercial and zoned C4-2D-SN (Commercial Zone, Height District 2 with Development Limitation, Hollywood Signage Supplemental Use District), C4-2D (Commercial Zone, Height District 2 with Development Limitation), and C2-1XL (Commercial Zone, Height District 1XL). Height District 2 allows a 6:1 FAR in the Project Site's C4 zoned portions with no height limit. However, the Project Site is subject to D Limitations, which limits the Project Site to a 2:1 FAR. Height District 1XL allows a 1.5:1 FAR in the Project Site's C2-zoned portions with a 30-foot and two-story height limit. The Project includes a total floor area of 443,418 square feet with a FAR of 6:1; however, as previously discussed above, this Initial Study assumes a total floor area of 445,218 square feet for conservative purposes. In order to permit a FAR of 6:1, the Project has requested a Height District Change from Height 1XL and 2D to Height District 2.

According to LAMC Sections 12.14 and 12.16, there is no setback requirement for the front, side, or rear yards for buildings used exclusively for commercial purposes. While the Project Site does not have front, side, or rear yards, the Project would incorporate transitions from the sidewalk to the ground floor uses and building entryways along Sunset Boulevard and Wilcox Street through the use of landscaped areas and canopies.

3.3.7 Sustainability Features

The Project would be designed and constructed to incorporate environmentally sustainable building features equivalent to a Gold certification under the U.S. Green Building Council's LEED® Rating System for new construction, and environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The Project would incorporate sustainability features for alternative, low-carbon modes of transportation, such as a protected bicycle storage facility and electric vehicle charging infrastructure. The Project would also incorporate water conservation features through low-water use plant selections and ultra-low flow indoor water fixtures. Additionally, as previously mentioned, the Project would include exterior and interior lighting that would meet the requirements of the California Energy Commission Building Energy Efficiency Standards—Title 24, version 2016 and the National Electrical Code.

3.3.8 Anticipated Construction Schedule

Construction of the Project would commence with demolition of the existing buildings and surface parking areas. This phase would be followed by grading and excavation for the subterranean parking. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to be completed in 2026. It is estimated that approximately 93,000 cubic yards of export would be hauled from the Project Site.

3.4 REQUESTED PERMITS AND APPROVALS

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

- Pursuant to LAMC Section 12.32-F, a Height District Change for the Project Site to change the Project Site's Height Districts No. 1XL and No. 2D to No. 2;
- Pursuant to LAMC Section 12.24-U.14, a Vesting Conditional Use Permit for a Major Development Project;
- Pursuant to LAMC Sections 12.24-W.1 a Master Conditional Use Permit for the sale and dispensing of alcoholic beverages for on-site and off-site consumption for three restaurants;
- Pursuant to LAMC Section 16.05, a Site Plan Review for a development that results in an increase of 50,000 square feet or more of non-residential floor area or generates more than 1,000 average daily trips;
- Pursuant to LAMC Section 11.5.14-D and 11.5.7-C, a Project Permit Compliance Review for Project signage in the Hollywood Signage Supplemental Use District;
- Pursuant to LAMC Section 17.15 and 17.03, a Vesting Tentative Tract Map No. 83088 to merge a 2,275 square-foot portion of Wilcox Avenue into the Project Site, merge and re-subdivide the Project Site to create two ground lots and 12 airspace lots, and request to remove the five-foot dedication along the entire alley abutting the lot with APN 5546-014-014 and remove a five-foot dedication along the alley abutting the lot with APN 5546-014-01; and
- Other discretionary and ministerial permits and approvals that are or may be required, including, but not limited to, temporary street closure permits, grading permits, excavation permits, haul route approval, street tree removal approval, foundation permits, and sign permits.

3.5 RESPONSIBLE PUBLIC AGENCIES

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

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

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

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that “visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA.”⁵ However, ZI No. 2452 further states that “the law does not limit the ability of the City to regulate, or study aesthetic related impacts pursuant to other land use regulations found in the Los Angeles Municipal Code (LAMC) or the City’s General Plan, including specific plans.” Thus, pursuant to PRC Section 21099 and ZI No. 2452, impact findings related to views, scenic resources, visual character, shading, and light and glare, would not be required, unless standards related to these issues are set forth in the General Plan, the LAMC, and other adopted plans. In the latter case, plan or regulation consistency must be evaluated for determination of significance.

PRC Section 21099 applies to the Project. Specifically, pursuant to PRC Section 21099, the Project is an employment center project that would be located on an infill site within a TPA. The Project is considered an employment center project because it is located on property that is zoned to permit commercial uses with a maximum FAR greater than 0.75. In addition, the Project Site is located on an infill site, as that term is defined in PRC Section 21099(a)(4), because the Project Site includes lots located within an urban

⁵ City of Los Angeles Department of City Planning, Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA, <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>, accessed Dec. 2, 2016.

area that has been previously developed. Lastly, the Project Site is located within a TPA, as that term is defined in PRC Section 21099(a)(7), because it is located within one-half mile of an existing “major transit stop.” In particular, the Project Site is located within one-half mile of the Los Angeles County Metropolitan Transit Authority (Metro) Hollywood and Vine Station and bus routes including the Metro 2 Local Line. The City’s Zone Information and Map Access System (ZIMAS) also confirms the Project Site’s location within a TPA, as defined in the ZI No. 2452. Therefore, in accordance with PRC Section 21099(d)(1), the Project’s aesthetic impacts shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA. The analysis in this Initial Study is for informational purposes only and not for determining whether the Project will result in significant impacts on the environment. Any aesthetic impact analysis in this Initial Study is included to discuss what aesthetic impacts could occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this Initial Study shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

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

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

Less Than Significant Impact. A scenic vista is a panoramic view of a valued visual resource.⁶ Panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are typically associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies. Focal views are also relevant when considering this question from Appendix G of the CEQA Guidelines. Examples of focal views include natural landforms, public art/signs, individual buildings, and specific, important trees.

With regard to panoramic views, valued visual resources in the vicinity of the Project Site include the Hollywood Hills and the Hollywood Sign, City of Los Angeles (City)-designated Historic-Cultural Monument No. 111, to the distant north. With regard to focal views, valued visual resources in the vicinity of the Project Site include Fire Station No. 27 (1355 N. Cahuenga Boulevard), which is located directly southeast of the Project Site and is listed on the National Register of Historic Places and as City Historic-Cultural Monument No. 165 and the Pacific Cinerama Dome and Theatre and Marquee, which is located at 6360 Sunset Boulevard, approximately 600 feet east of the Project Site, and which is a City-designated Historic Cultural Monument (No. 659).

Adjacent to the Project Site, views of the Hollywood Hills and the Hollywood Sign are available from Sunset Boulevard looking north between buildings and north-south streets. Specifically, views of the Hollywood Hills and the Hollywood Sign are available from along Wilcox Avenue west of the Project Site and at Wilcox Avenue and De Longpre Avenue. More limited views of the Hollywood Hills and the Hollywood Sign are also available from Cole Place east of the Project Site. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is bound by Sunset Boulevard to the north, Cole Place to the east, De Longpre Avenue to the south, and Wilcox Avenue to the west.

The Project would replace the existing one- and two-story buildings and surface parking lot within the Project Site with a new 15-story commercial building within the northern portion of the Project Site and a two-story building on the southern portion of the Project Site to house LADWP equipment. Therefore, the Project could potentially block existing views of the Hollywood Hills and Hollywood Sign available along De Longpre Avenue when looking north/northeast through the Project Site. However, in the vicinity of the Project Site, views would continue to be available 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 Cole Place or Wilcox Avenue because the existing views are oriented north-south and the Project Site is an infill location between these north-south streets. Therefore, while the Project would obstruct some partial and distant views of the Hollywood Hills and Hollywood Sign (primarily views across the Project Site from De Longpre Avenue), such blockage would occur on an intermittent basis at single, fixed vantage points, rather than resulting in substantial blockages across long distances, such as along the length of a public roadway. Furthermore, a myriad of other views of the Hollywood Hills and Hollywood Sign at various degrees would continue to be available throughout the greater Hollywood neighborhood. Therefore, the reduction in publicly-available intermittent views of the Hollywood Hills and the Hollywood Sign that would result from the Project would not be considered a substantial obstruction of existing views of these visual resources.

Focal views of the visual resources found in the vicinity of the Project Site are largely limited to adjacent properties due to the dense infill development which blocks views of properties located further from the Project Site. In particular, due to the distance of the Pacific Cinerama Dome and Theatre and Marquee from the Project Site and intervening development, including large high-rise buildings, views of the theatre from the Project Site are not available. Therefore, development of the Project would not block existing views of the Pacific Cinerama Dome and Theatre and Marquee across the Project Site as none are available. As previously discussed, Fire Station No. 27 is located directly southwest of the Project Site at the intersection of De Longpre Avenue and Cahuenga Boulevard. The portion of the Project Site located nearest to Fire Station No. 27 is currently occupied by a two-story, 4,848-square-foot commercial building

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

along Cole Place and De Longpre Avenue. This existing building would be replaced by the proposed 18-foot, 3,550-square-foot LADWP equipment building, which would be located only along Cole Place with surface parking located along Cole Place and De Longpre Avenue. Therefore, the Project would actually open this area of the Project Site in close proximity to Fire Station No. 27. Due to the location of the Project Site northwest of Fire Station No. 27 and existing intervening development, the Project would not block existing publicly available views of Fire Station No. 27 when looking across the Project Site. Specifically, focal views of Fire Station No. 27 from along Cole Place, De Longpre Avenue, and Cahuenga Boulevard would remain. In addition, public views of Fire Station No. 27 are best experienced looking west from Cahuenga Boulevard and looking south from De Longpre Avenue. As the Project would be located across De Longpre Avenue to the northwest of Fire Station No. 27, the Project would not block these views of the fire station.

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

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

Less Than Significant Impact. The Project Site is not located along a state scenic highway. The nearest officially eligible state scenic highway is along the Foothill Freeway (I-210), approximately 10 miles northeast of the Project Site,⁷ and the nearest City-designated scenic highway is along Mulholland Drive, approximately 2 miles northwest of the Project Site.⁸ Therefore, the Project would not substantially damage scenic resources within a state or City-designated scenic highway as no scenic highways are located adjacent to the Project Site. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impact would not be considered a significant impact on the environment. Therefore, no further evaluation of this topic in an EIR is required.

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

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

With regard to zoning, as discussed in Section 3, Project Description, of this Initial Study, the Project Site is designated as Regional Center Commercial with the corresponding zones of C4-2D-SN (Commercial Zone, Height District 2 with Development Limitation, Hollywood Signage Supplemental Use District),

⁷ California Department of Transportation, Scenic Highways, <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>, accessed April 20, 2020.

⁸ City of Los Angeles, Department of City Planning, Mobility Plan 2035: An Element of the General Plan, Map A4, last adopted by City Council on September 7, 2016.

C4-2D (Commercial Zone, Height District 2 with Development Limitation), and C2-1XL (Commercial Zone, Height District 1XL). The C2 and C4 zones allow for a wide variety of land uses, including retail stores, office buildings, theaters, hotels, broadcasting studios, public utilities and public service uses and structures, parking buildings, parks, and playgrounds. Height District 2 allows a 6:1 FAR in the Project Site's C4-zoned portions with no height limit. However, the Project Site is subject to D Limitations, which limits the Project Site to a 2:1 FAR. Height District 1XL allows a 1.5:1 FAR in the Project Site's C2-zoned portions with a 30-foot and two-story height limit.

The Project includes the development of a 15-story commercial building with a total floor area of 443,418 square feet consisting of 431,032 square feet of office space and 12,386 square feet of ground floor commercial space.⁹ The Project also includes the construction of an 18-foot-tall, 3,550-square-foot building to house LADWP equipment and an underground generator. The area proposed for the LADWP equipment building would not constitute floor area as defined by the LAMC. The Project uses would be consistent with the types of uses permitted in the C4 and C2 Zone, as described above. As previously discussed, the zoning of the Project Site does not establish a height maximum or a maximum number of stories, but rather permits a maximum FAR of up to six times the buildable area of the lot. Upon completion, the Project would result in a net floor area of 417,157 square feet on the Project Site or 418,957 square feet under a conservative analysis, and a FAR of 6:1. In order to permit a FAR of 6:1, the Project has requested a Height District Change from Height 1XL and 2D to Height District 2.

With regard to the City's regulations governing scenic quality, local land use plans applicable to the Project Site also include policies governing scenic quality, including the Citywide General Plan Framework Element (Framework Element), the Hollywood Community Plan (1988), the Hollywood Redevelopment Plan, the Citywide Urban Design Guidelines, and the City's Walkability Checklist. The Project's lack of conflict with the general intent of these plans is briefly discussed below.

Citywide General Plan Framework Element

The Framework Element provides direction regarding the City's vision for future development in the City and includes an Urban Form and Neighborhood Design chapter to guide the design of future development. One of the key objectives of the Urban Form and Neighborhood Design Chapter is to enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm (Objective 5.5). As described in Section 3, Project Description, of this Initial Study, the Project Site is currently occupied by three buildings and a surface parking lot. The existing buildings on the Project Site include a one-story building along Sunset Boulevard and Wilcox Street/Cole Place, a one-story building along Wilcox Street, and a two-story building along Cole Place and De Longpre Avenue. The area surrounding the Project Site is developed primarily with a mix of low- to high-intensity residential, commercial, and mid-rise office buildings, which vary widely in building style and period of construction. Land uses adjacent to the Project Site include the Rise Hollywood mixed-use development, the Los Angeles Police Department Hollywood Station, the Los Angeles Fire Department (LAFD) Station 27 south of the Project Site, the 14-story CNN building east of the Project Site, and an 11-

⁹ As provided in Section 3, Project Description, of this Initial Study, approximately 1,800 square feet of outdoor covered patio areas adjacent to the ground floor restaurant space along Sunset Boulevard would not count towards the Project's total floor area pursuant to LAMC Sections 12.03 and 12.21.1-A.5. Nevertheless, to provide a conservative environmental analysis, this Initial Study assumes these aforementioned outdoor dining areas count towards the floor area, resulting in a total floor area of 445,218 square feet, including 431,032 square feet of office space and 14,186 square feet of restaurant space.

story office building located west of the Project Site. The 14-story CNN building east of the Project Site is designed with black glass and the 11-story building west of the Project Site is a lighter dark-rose colored building with ribbon windows and a parking podium. The Project would complement the surrounding buildings in terms of scale and massing as the proposed commercial building is of similar scale and mediates between the two adjacent buildings by stepping back from Sunset Boulevard. Similar to the CNN Building's cladding, the Project would incorporate a glass façade, and like the 11-story building west of the Project Site, the Project would incorporate a parking podium. The Project would enhance the built environment in the surrounding neighborhood and upgrade the quality of development by replacing the existing buildings and surface parking lot with a high quality commercial building that features a new contemporary glass façade structure with various repeating rectangle forms, creating a distinctive character. The Project would include design elements that would contribute to the neighborhood's vibrant commercial energy and supportive of pedestrian circulation. Specifically, the proposed commercial building would be designed in a contemporary architectural style that would be compatible with the general urban characteristics of the surrounding neighborhood. The proposed commercial building would be moderated by a high degree of articulation, using both variations in building planes and façade setbacks, as well as a variety of materials, and would be designed to complement the surrounding neighborhood. In particular, the proposed commercial building, located along Sunset Boulevard, would feature varying façade planes articulated by non-reflective glass curtain walls, metal panels, black mullions, exposed black steel beams, polycarbonate cladding, board formed concrete, and a decorative screening element. Ground level windows would use transparent glass, which would contribute to an inviting and pedestrian-oriented streetscape along Sunset Boulevard. The proposed commercial building would also include a large landscaped outdoor deck, pulling back the building massing along Sunset Boulevard.

Additionally, the proposed LADWP equipment building, located along Cole Place, would feature a minimalist design with a muted color palette and a green wall-type screen to visually enhance the building and the pedestrian experience along this area of the Project Site. The Project would also include 35 new street trees adjacent to the Project Site to enhance pedestrian-level amenities.

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

Hollywood Community Plan

As it relates to scenic quality, the Hollywood Community Plan includes the following policy applicable to the Project:

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

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

Hollywood Redevelopment Plan

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

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

As previously discussed above, the Project would enhance the built environment in the surrounding neighborhood and upgrade the quality of development over existing Project Site improvements. Specifically, the proposed commercial building would be designed in a contemporary architectural style that would be compatible with the general urban characteristics of the surrounding neighborhood. The proposed commercial building would be moderated by a high degree of articulation, using both variations in building planes and façade setbacks, as well as a variety of materials, and would be designed to complement the surrounding neighborhood. Additionally, the proposed LADWP equipment building would feature a minimalist design with a muted color palette and a green wall-type screen to visually enhance the building and the pedestrian experience along this area of the Project Site. The Project would also enhance the streetscape by installing landscaping, including new street trees. In addition, the Project would implement several safety features such as an enhanced closed-circuit camera system and keycard or guarded entry. Proper lighting of buildings and walkways would be incorporated to maximize visibility and provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the commercial building. Parking areas would also be lit to maximize visibility and reduce areas of concealments. Finally, entrances to, and exits from the building, would be designed to be open and in view of surrounding sites. Overall, the Project would support the Redevelopment Plan's goal to improve the quality of the environment and, therefore, would not conflict with the Hollywood Redevelopment Plan goals related to scenic quality.

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

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

Less Than Significant Impact. As discussed in the *L.A. CEQA Thresholds Guide*, new light sources introduced by a project may increase ambient nighttime illumination levels. Additionally, nighttime spillover of light onto adjacent properties has the potential to interfere with certain functions, including vision, sleep, privacy, and general enjoyment of the natural nighttime condition. The significance of the

impact depends on the type of use 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, spot lights, and/or headlights associated with construction equipment and hauling trucks, typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of Project construction. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements.¹⁰ Additionally, as part of the Project, construction lighting would be shielded such that no light source can be seen from adjacent residential properties. 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 are generally required to generate substantial glare are typically not an element of construction activities. Furthermore, temporary construction fencing would be placed along the periphery of the Project Site to screen construction activity from view at the street level from off-site locations. Therefore, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur.

Based on the above, light and glare associated with temporary Project construction would not substantially alter the character of off-site areas surrounding the Project Site or adversely impact day or nighttime views in the area. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impacts would not be considered a significant impact on the environment. Therefore, no further evaluation of this topic in an EIR is required.

Operation

The Project would replace the existing buildings and associated surface parking areas on the Project Site with a new 15-story commercial building and two-story building to house LADWP equipment, which would increase light and glare levels emanating from the Project Site. The Project lighting would include architecturally-integrated low-level exterior lights on the buildings and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the Project Site. Project lighting would be designed to provide for efficient, effective, and aesthetically pleasing lighting solutions that would minimize

¹⁰ 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.

light trespass from the Project Site and minimize sky-glow to increase night sky access. All exterior lighting would be dimmable and automatically controlled via occupancy sensors and photo sensors to allow for the appropriate control of nighttime lighting. Interior lighting would be dimmable and controlled to meet all prevailing code requirements, which includes the use of occupancy sensors, multi-scene presets, and timeclock events.

All exterior and interior lighting would meet the requirements of the California Energy Commission Building Energy Efficiency Standards—Title 24 and the National Electrical Code (NEC). Light trespass from interior spaces would be limited by blinds and/or drapery or would be installed in such a way as to not create light trespass off of the Project Site. Any new street and/or pedestrian lighting within the public right-of-way would comply with all applicable City regulations and would be approved by the Bureau of Street Lighting, as required, in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties.

As discussed in Section 3, Project Description, of this Initial Study, proposed signage would include general street level tenant/site identification and visitor directional signage as permitted by the LAMC. Proposed signage would be internally illuminated for nighttime use and would include one digital (non-animated) wall sign along the Sunset Boulevard frontage. In accordance with the LAMC, illumination used for Project signage would be limited to a light intensity of 3 foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property. In addition, given the Project Site's location along the highly active Sunset Boulevard corridor, the proposed signage and associated lighting would not generate lighting that would be out of character with the well-developed commercial boulevard. All proposed signage would also comply with permitted sign locations pursuant to the LAMC, the Hollywood Signage Supplemental Use District, and the Hollywood Redevelopment Plan Revised Amended Design for Development for Signs in Hollywood, as applicable.

Daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. In general, sun reflection that has the greatest potential to interfere with driving occurs from the lower stories of a structure. Sun reflection from the Project would occur during periods in which the sun is low on the horizon and when the point of reflection within the Project Site is in front of the driver, in the direction of travel. The Project would feature a variety of surface materials, including glass, concrete, timber, and metal. As part of the Project, glass used in building façades would have high-performance coatings that would not be highly reflective, thereby minimizing glare from reflected sunlight. In addition, windows on the upper levels of the building would include exterior shading elements including an overhanging wooden crown, shading devices hung from cantilevers, and architectural screens to further reduce glare.

Nighttime glare could result from illuminated signs and vehicle headlights. As described above, Project illuminated signs would not exceed the prescribed lighting requirements of the LAMC. Furthermore, while headlights from vehicles entering and exiting the parking levels on the ground floor would be visible during the evening and nighttime hours, such lighting sources would be typical for the area. Thus, nighttime glare would not result in a substantial adverse impact.

Based on the above, with adherence to regulatory requirements, lighting associated with Project operation would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetic impact would

not be considered a significant impact on the environment. Therefore, no further evaluation of this topic in an EIR is required.

II. AGRICULTURE AND FORESTRY RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. The Project Site is located in an urbanized area of the City. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with commercial uses and surface parking. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of

Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.¹¹ As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is zoned as C4-2D-SN (Commercial Zone, Height District 2 with Development Limitation, Hollywood Signage Supplemental Use District), C4-2D (Commercial Zone, Height District 2 with Development Limitation), and C2-1XL (Commercial Zone, Height District 1XL). The Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area. The Project Site and surrounding area are also not enrolled under a Williamson Act Contract.¹² Therefore, the Project would not conflict with any existing zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As previously discussed, the Project Site is located in an urbanized area and is currently developed with commercial uses and surface parking. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned for commercial uses and is not zoned and/or used as forest land.¹³ Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the Public Resources and Government Codes. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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

¹¹ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5546014056, 5546014013, 5546014014, and 5546014017, <http://zimas.lacity.org/>, accessed April 20, 2020.

¹² City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5546014056, 5546014013, 5546014014, and 5546014017, <http://zimas.lacity.org/>, accessed April 20, 2020.

¹³ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5546014056, 5546014013, 5546014014, and 5546014017, <http://zimas.lacity.org/>, accessed April 20, 2020.

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

No Impact. As discussed above, the Project Site is located in an urbanized area of the City and does not include farmland or forest land. The Project Site and surrounding area are also not mapped as farmland or forest land, are not zoned for farmland/agricultural use or forest land, and do not contain any agricultural or forest uses.¹⁴ As such, the Project would not result in the conversion of farmland to non-agricultural use or in the conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

III. AIR QUALITY

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (the Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [PM_{2.5}], and lead¹⁵). SCAQMD’s 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies

¹⁴ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5546014056, 5546014013, 5546014014, and 5546014017, <http://zimas.lacity.org/>, accessed April 20, 2020.

¹⁵ Partial Nonattainment designation for lead for the Los Angeles County portion of the Basin only.

are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.¹⁶ With regard to future growth, SCAG has prepared their Regional Transportation Plan/Sustainable Communities Strategy,¹⁷ which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area. Construction and operation of the Project may result in an increase in stationary and mobile source air emissions. As a result, development of the Project could have a potential adverse effect on SCAQMD's implementation of the AQMP. Therefore, the EIR will provide further analysis of the Project's potential conflicts with the AQMP.

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

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

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

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

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

Less Than Significant Impact. No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. With respect to Project operation, according to the SCAQMD

¹⁶ SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.

¹⁷ The Regional Council of Southern California Association of Governments (SCAG) formally adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS) September 2020. However, the 2020–2045 RTP/SCS has not been formally certified by the California Air Resources Board. As such, SCAG's 2016–2040 RTP/SCS is also considered in the discussion of population and housing provided below.

CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project does not propose these uses and consists of commercial office and restaurant uses. On-site trash receptacles would also be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

In addition, the construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.¹⁸ In particular, Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.¹⁹

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

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

¹⁸ SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed April 16, 2020.

¹⁹ SCAQMD, Rule 402, Nuisance, www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf, accessed April 16, 2020.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. The Project Site is located in an urbanized area and is currently developed with three buildings and surface parking. Landscaping within the Project Site is limited to common ornamental trees, grasses, and shrubs. Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings. Based on the lack of habitat on the Project Site, it is unlikely any special status species listed by the California Department of Fish and Wildlife (CDFW)²⁰ or by the U.S. Fish and Wildlife Service (USFWS)²¹ would be present on-site. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City.²² Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW or USFWS. No impact would occur, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

²⁰ California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, August 2019.

²¹ United States Fish and Wildlife Service, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, <https://ecos.fws.gov/ecp0/reports/species-listed-by-state-report?stateAbbrev=CA&stateName=California&statusCategory=Listed&status=listeds>, accessed August 17, 2020.

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

No Impact. The Project Site is located in an urbanized area and is currently developed with commercial uses and surface parking. No riparian or other sensitive natural community exists on the Project Site or in the surrounding area.^{23,24} Furthermore, the Project Site and surroundings are not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County of Los Angeles.^{25,26} In addition, there are no other sensitive natural communities identified by the CDFW or the USFWS.^{27,28,29} Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is located in an urbanized area and is currently occupied by commercial uses and surface parking. No water bodies or state or federally protected wetlands exist on the Project Site or in the immediate vicinity.³⁰ As such, the Project would not have an adverse effect on state or federally protected wetlands. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As described above, the Project Site is located in an urbanized area and is currently occupied by commercial uses and surface parking. The Project Site currently contains some ornamental trees and landscaping. The areas surrounding the Project Site are fully developed, and there are no large expanses of open space areas within and surrounding the Project Site that provide linkages to natural open spaces areas that may serve as wildlife corridors. The Project Site is also not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County

²³ California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS <https://apps.wildlife.ca.gov/bios/>, accessed April 20, 2020.

²⁴ United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed April 20, 2020.

²⁵ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, p. 2-18-4.

²⁶ Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.

²⁷ California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS <https://apps.wildlife.ca.gov/bios/>, accessed April 20, 2020.

²⁸ California Department of Fish and Wildlife, CDFW Lands, www.wildlife.ca.gov/Lands, accessed April 20, 2020.

²⁹ U.S. Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/index.html, accessed April 20, 2020.

³⁰ U.S. Environmental Protection Agency, NEPAAssist, www.epa.gov/nepa/nepassist, accessed April 20, 2020.

of Los Angeles.^{31,32} Therefore, the Project Site and surroundings do not include areas that could be used as wildlife corridors.

The Project Site is relatively flat with limited ornamental landscaping. As discussed in the Tree Report prepared for the Project, included in Appendix IS-1 of this Initial Study, there are four trees within the Project Site and 12 street trees around the perimeter of the Project Site. The Project would involve removal of all onsite trees and the 12 street trees adjacent to the Project Site. Although unlikely, these trees could potentially provide nesting sites for migratory birds. However, the Project would comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish and Game Code Section 3503 states that “[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.” No exceptions are provided in the California Fish and Game Code and California Department of Fish and Wildlife has never promulgated any regulations interpreting these provisions.

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

With compliance with the Migratory Bird Treaty Act, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The City of Los Angeles Protected Tree Ordinance (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, and California Bay trees of at least four inches in diameter at breast height. These tree species are defined as “protected” by the City of Los Angeles. Trees that have been planted as part of a tree planting program are exempt from the City’s Protected Tree Ordinance and are not considered protected. The City’s Protected Tree Ordinance prohibits, without a permit, the removal of any regulated protected tree, including “acts which inflict

³¹ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

³² Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.

damage upon root systems or other parts of the tree...” and requires that all regulated protected trees that are removed be replaced on at least a 2:1 basis with trees that are of a protected variety.

Based on the Tree Report included in Appendix IS-1 of this Initial Study, the Project would not involve the removal of any trees considered protected under the City of Los Angeles Native Tree Protection Ordinance either within the Project Site or in the adjacent right-of-way (street trees). To allow for development of the Project, the existing four onsite trees and 12 street trees would be removed in the adjacent right-of-way. Pursuant to the requirements of the City of Los Angeles Urban Forestry Division, the onsite trees to be removed would be replaced at a 1:1 ratio and the street trees to be removed would be replaced at a 2:1 basis. Therefore, in compliance with the City’s tree replacement requirements, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is located in an urbanized area and is currently occupied by commercial uses and surface parking. As described above, the Project Site does not support any habitat or natural community.^{33,34} No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.³⁵ Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

V. CULTURAL RESOURCES

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

³³ California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS <https://apps.wildlife.ca.gov/bios/>, accessed April 20, 2020.

³⁴ United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed April 20, 2020.

³⁵ California Department of Fish and Wildlife, California Regional Conservation Plans, October 2017.

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

Potentially Significant Impact. Section 15064.5 of the CEQA Guidelines generally defines a historical resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to 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). In addition, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be 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. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register. The local register of historical resources is managed by the Los Angeles Office of Historic Resources, which operates SurveyLA, a comprehensive program to identify significant historical resources throughout the City.

As previously described, the Project Site is currently developed with three buildings and surface parking. Some of the buildings within and adjacent to the Project Site appear to be 50 or more years old. In addition, the adjacent LAFD Fire Station No. 27 is a designated historical resource. Therefore, further evaluation of the Project's potential impacts on historical resources will be included in the EIR.

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

Less Than Significant Impact. CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within an urbanized area of the City and has been subject to grading and development in the past. Therefore, surficial archaeological resources that may have existed at one time have likely been previously disturbed. As discussed in Section 3, Project Description, of this Initial Study, the Project would involve excavation to a maximum depth of 52 feet. Thus, the Project could have the potential to disturb previously undiscovered archaeological resources. Based on the records search conducted by the South Central Coastal Information Center (SCCIC) on July 22, 2020 and included in Appendix IS-2 of this Initial Study, no archaeological resources have been found at the Project Site. Specifically, SCCIC records indicate that two previously recorded cultural resources have been documented within a 0.5-mile radius of the Project Site. None of these resources overlap, intersect, or are adjacent to the Project Site. Nevertheless, it is always possible that unknown and unanticipated intact archaeological deposits and/or features could be present at subsurface levels. To this end, the City has established a standard condition of approval to address inadvertent discovery of archaeological resources. Should archaeological resources be inadvertently encountered, the City's condition of approval provides for temporarily halting construction activities near the encounter and retaining a qualified archaeologist to assess the find. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements as set forth in CEQA Section 21083.2. Overall, with adherence to the City's condition of

approval consistent with CEQA Section 21083.2, the Project would not cause a substantial adverse change in the significance of an archaeological resource. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

Less Than Significant Impact. The Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. Nevertheless, the Project would require grading and excavation at a depth of 52 feet below ground surface, which could have the potential to disturb existing but undiscovered human remains.

If human remains were discovered during construction of the Project, work in the immediate vicinity of the construction area would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with Public Resources Code Section 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determined the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the person or persons it believes to be most likely descended from the deceased Native American. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. Therefore, due to the low potential that any human remains are located on the Project site, and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, the Project’s impact related to human remains would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

VI. ENERGY

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

- a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
- b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

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

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with three buildings and surface parking lots. The Project includes the development of a 15-story commercial building consisting of 431,032 square feet of office space and 12,386 square feet of ground floor commercial space.³⁶ The Project would also include the construction of a two-story building to house LADWP equipment and an underground generator. The Project would generate an increased demand for electricity and natural gas services provided by LADWP and the Southern California Gas Company, respectively, compared to existing conditions. While development of the Project would not be anticipated to cause wasteful, inefficient, and unnecessary consumption of energy resources, further analysis of the Project's demand on existing energy resources will be provided in the EIR.

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

Potentially Significant Impact. First established in 2002 under Senate Bill 1078, California's Renewable Portfolio Standards require retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020.³⁷ The LADWP provides electrical service throughout the City and many areas of the Owens Valley. LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. In accordance with Senate Bill 1078, LADWP is required to procure at least 33 percent of its energy portfolio from renewable sources by 2020.

Regarding energy efficiency, the California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction, system design, and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2019 Title 24 standards, which became effective on January 1, 2020.³⁸ The 2019 Title 24 standards include efficiency improvements to the residential standards for attics, walls, water heating, and lighting and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1 2013 national standards.³⁹

As previously described, the Project Site is currently developed with three buildings and surface parking. The Project Site does not include any renewable energy sources used by LADWP. The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. In addition, the Project would be designed and constructed to incorporate environmentally sustainable building features equivalent to a Gold certification under the U.S. Green Building Council's LEED® Rating System for new

³⁶ As provided in Section 3, Project Description, of this Initial Study, approximately 1,800 square feet of outdoor covered patio areas adjacent to the ground floor restaurant space along Sunset Boulevard would not count towards the Project's total floor area pursuant to LAMC Sections 12.03 and 12.21.1-A.5. Nevertheless, to provide a conservative environmental analysis, this Initial Study assumes these aforementioned outdoor dining areas count towards the floor area, resulting in a total floor area of 445,218 square feet, including 431,032 square feet of office space and 14,186 square feet of restaurant space.

³⁷ CPUC, California Renewables Portfolio Standard (RPS), www.cpuc.ca.gov/RPS_Homepage/, accessed October 5, 2020.

³⁸ CEC, 2019 Building Energy Efficiency Standards, www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency, accessed October 5, 2020, 2020..

³⁹ CEC, 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, December 2018..

construction. While the Project would not be anticipated to conflict with or obstruct a state or local plan for renewable energy or energy efficiency, the Project's compliance with LADWP's plans for renewable energy, as well as the Project's compliance with California Building Energy Efficiency Standards, will be further evaluated in the EIR.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The following analysis is based on the Geotechnical Feasibility Report prepared for the Project by Group Delta Consultants, dated May 2020. All specific information on geologic and soils conditions in the discussion below is from this report unless otherwise noted. The Geotechnical Feasibility Report is included as Appendix IS-3 of this Initial Study. The Grading Division of the Los Angeles Department of Building and Safety reviewed the Geotechnical Feasibility Report and provided comments. The assessment letter provided by the Grading Division of the Los Angeles Department of Building and Safety

as well as an addendum report to the Geotechnical Feasibility Report are also included in Appendix IS-3 of this Initial Study. Additionally, the final soils approval letter from the Grading Division of the Los Angeles Department of Building and Safety is also included in Appendix IS-3 of this Initial Study.

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

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

Less Than Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey, faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement younger than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The California Geological Survey establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). 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.⁴⁰

Based on the Geotechnical Feasibility Report and a review of the City's General Plan Safety Element, the Project Site is not within an Alquist-Priolo Earthquake Fault Zone or within a City-designated Fault Rupture Study Area, and no known active faults underlie the Project Site.⁴¹ According to the Geotechnical Feasibility Report, the Project Site is located within the Hollywood Basin. The Hollywood Basin is structurally bound by the Hollywood Fault to the north and the North South Lake Fault to the south. The Hollywood fault is the closest active fault considered capable of surface rupture, located approximately 0.43 mile (0.6 kilometer) north of the Project Site.⁴² However, as concluded in the Geotechnical Feasibility Report, the risk for surface rupture at the Project Site is considered low as there are no known faults underlying the Project Site. Furthermore, while the Project would involve excavation for the three subterranean parking levels, the proposed development would not involve mining operations or deep excavation into the earth, which could create unstable seismic conditions or stresses in the Earth's crust.

⁴⁰ City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit A, p. 47.

⁴¹ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5546014056, 5546014013, 5546014014, and 5546014017, <http://zimas.lacity.org/>, accessed April 20, 2020.

⁴² City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5546014056, 5546014013, 5546014014, and 5546014017, <http://zimas.lacity.org/>, accessed April 20, 2020.

The Project would not exacerbate existing fault rupture conditions and thus, the Project would not exacerbate existing environmental conditions by introducing people or structures into areas potentially susceptible to substantial adverse effects, including fault rupture. Therefore, the Project's impacts associated with surface rupture from a known earthquake fault would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region, which generally experiences moderate to strong ground shaking in the event of an earthquake on a local or regional fault. However, as noted above, no active faults are known to pass directly beneath the Project Site. In addition, state and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. Specifically, the state and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the City's General Plan Safety Element, and the Los Angeles Building Code. Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions 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 current seismic design provisions of the 2019 California Building Code, with City amendments, to minimize seismic impacts. The 2019 California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of the LADBS, including the recommendations provided in a final, site-specific geotechnical report subject to review and approval by the LADBS. The Project would not involve mining operations, deep excavations into the earth, or borings of large areas and thus would not exacerbate potential on-site seismic conditions. Therefore, through compliance with regulatory requirements and site-specific geotechnical recommendations contained in a final design-level geotechnical engineering report, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Impacts related to strong seismic ground shaking would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction involves the sudden loss in strength of a saturated, cohesionless soil caused by the build-up of pore water pressure during cyclic loading, such as that produced by an earthquake. This increase in porewater can temporarily transform the soil into a fluid mass, resulting in differential settlement, and can also cause ground deformations. Typically, liquefaction occurs in shallow groundwater areas where there are loose, cohesionless, fine grained soils.

As discussed in the Geotechnical Feasibility Report, the Project Site is not located in a State of California designated Liquefaction Hazard Zone. In addition, the historically highest groundwater level at the Project Site is approximately 50 feet below ground surface. As discussed in the Geotechnical Feasibility Report,

the subsurface soil conditions consist of predominantly very stiff clayey materials and is not susceptible to liquefaction. Therefore, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving liquefaction. Impacts associated with liquefaction would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iv. Landslides?

No Impact. Landslides can occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain during precipitation, soil disturbance, changes in groundwater, or seismic activity. The Project Site is not located in a landslide area as mapped by the state⁴³ or the City.^{44,45} Development of the Project would not substantially alter the existing topography of the Project Site. Specifically, the Project does not propose creating any steep slopes or altering the Project Site's terrain. Therefore, the Project would not exacerbate existing conditions that could result in the exposure of people and/or buildings to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. As such, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently fully developed with buildings and surface parking; and the Project would cover the same area. As such, there are no open spaces and there would not be open spaces at the Project Site with exposed topsoil. However, development of the Project would require grading, excavation, and other construction activities that have the potential to disturb existing soils underneath the Project Site and expose these soils to rainfall and wind during construction, thereby potentially resulting in soil erosion. This potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities. Specifically, all grading activities would require grading permits from the LADBS, which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavations, and fills. Regarding soil erosion during Project operations, the potential is negligible since the Project Site would mostly remain fully developed, except for some landscaping located throughout the Project Site. However, the landscaping would include trees to prevent soil erosion. Furthermore, the Project would be required to comply with the City's Low Impact Development (LID) ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Therefore, with compliance with applicable regulatory requirements, impacts regarding soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

⁴³ State of California, California Geological Survey, Seismic Hazard Zones. Los Angeles Quadrangle, March 25, 1999.

⁴⁴ Los Angeles General Plan Safety Element, November 1996, Exhibit C, Landslide Inventory & Hillside Areas, p. 51.

⁴⁵ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5546014056, 5546014013, 5546014014, and 5546014017, <http://zimas.lacity.org/>, accessed April 20, 2020.

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

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

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

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. No large scale extraction of groundwater, gas, oil or geothermal energy is occurring or planned at the Project Site or in the general vicinity of the Project Site. Therefore, there is minimal to no potential for ground subsidence due to withdrawal of fluid or gas at the Project Site. Thus, impacts related to subsidence would be less than significant, and no mitigation measures are required.

Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events. According to the Geotechnical Feasibility Report, the soils underlying the Project Site indicate moist, very stiff/dense clayey soils. Due to the type and density of the soils underlying the Project Site, the Project Site soils would not be considered collapsible soils. Therefore, the Project Site is not located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in collapse. Impacts associated with collapsible soils would be less than significant, and no mitigation measures are required.

Based on the above, the Project would not cause a geologic unit or soil to become unstable. The Project would not exacerbate existing conditions with regard to geologic or soil stability. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Expansive soils are typically associated with clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. As discussed in the Geotechnical Feasibility Report, the underlying site conditions include artificial fill materials consisting of silty sand to sandy silt with little gravel. The underlying native soils generally consist of medium dense silty sand to a depth of 15 feet, and very stiff clayey materials to a depth of 61 feet. The on-site geological materials are considered to be expansive and are classified as medium expansive. As discussed in the Geotechnical Feasibility Report, it is recommended that the upper two feet of subgrade clayey soils are removed and replaced with non-expansive properly compacted fill soils and that the moisture barriers and control are implemented. Therefore, with implementation of the recommendations set forth in the Geotechnical Feasibility Report into the design of the Project, the Project would not exacerbate existing environmental

conditions that could create substantial risk to life or property due to expansive soils. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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

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

Less Than Significant Impact. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. As the Project Site has been previously graded and developed, surficial paleontological resources that may have existed at one time have likely been previously disturbed. In addition, a paleontological records search conducted by the Natural History Museum for the Project Site included in Appendix IS-4 of this Initial Study indicates there are no previously encountered fossil vertebrate finds located within the Project Site. However, according to the records search, vertebrate fossil localities have been discovered either at the surface or at depth nearby from the same sedimentary deposits that occur on the Project Site. As detailed in the records search fossil localities have been found in older alluvium in the vicinity of the Project Site. As discussed in the Geotechnical Feasibility Report, artificial fill materials were encountered within the Project Site to approximately 2 feet depth. Older alluvial fan deposits lie below the fill materials to maximum depth explored (over 40 feet). Therefore, very shallow excavations are unlikely to uncover significant vertebrate deposits. However, the Project would include excavations up to a maximum depth of 52 feet below ground surface. Thus, the possibility exists that paleontological artifacts that were not discovered during prior construction or other human activity may be present. The City has established a standard condition of approval to address inadvertent discovery of paleontological resources. Should paleontological resources be inadvertently encountered, the City's condition of approval provides for temporarily halting construction activities near the encounter and retaining a qualified paleontologist to assess the find and, if necessary, developing a plan for removal and treatment of the find. Overall, with adherence to the City's condition of approval, the Project would not directly or indirectly destroy a unique paleontological resource. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

With regard to a unique geologic feature, the Project Site is currently developed with three buildings and surface parking and there are no unique geologic features on the Project Site. Therefore, the Project would not directly or indirectly destroy a unique geologic feature. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

VIII. GREENHOUSE GAS EMISSIONS

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

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

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

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

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

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

The following analysis is based on the Phase I Environmental Site Assessments prepared for 6450 Sunset Boulevard, dated August 2020, 1413 Cole Place, dated January 2020, and 1424/1428 Wilcox Avenue, dated August 2020, (collectively referred to herein as the Phase I ESAs) prepared for the Project by BA Environmental. All specific information regarding the Project Site's hazards conditions in the discussion below is from these reports unless otherwise noted. These reports are included as Appendix IS-5 of this Initial Study.

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

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

Construction

The Project would not involve the routine transport of hazardous materials to and from the Project Site during construction. During demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints,

adhesives, and caustic or acidic cleaners could be routinely used on the Project Site through the duration of construction. While some hazardous materials used during construction could require disposal, such activity would occur only for the duration of construction and would cease upon completion of the Project.

As such, construction of the Project would not involve the routine disposal of hazardous materials. Notwithstanding, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, existing regulations are aimed at establishing specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. The Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through the use of hazardous materials during construction. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Operation

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in commercial uses, including cleaning products, paints, and those used for maintenance of landscaping. Such use would be consistent with that currently occurring at other nearby developments. In addition, as with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with all applicable federal, state, and local requirements. Due to the type of development proposed (e.g., office and commercial), operation of the Project would not involve the routine transport of hazardous materials to and from the Project Site. Therefore, with implementation of appropriate hazardous materials management protocols at the Project Site and compliance with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during operation of the Project would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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

As discussed in the Phase I ESA for the 6450 Sunset Boulevard property, based on available historical sources, the portion of the Project Site located on 6450 Sunset Boulevard was occupied by feed and hay storage buildings and a single-family residence from prior to 1907 until 1919 when the feed and hay

buildings were converted into retail store fronts. By 1938, the northern portion of the 6450 Sunset Boulevard property was redeveloped to include a gasoline service station and automotive repair shop, with the southern portion of the property occupied by single family residences and duplexes. The residential structures were later demolished by 1955 and redeveloped into a parking lot, and the gasoline service station was demolished in 1994 and was redeveloped into a retail store, Staples. This portion of the Project Site has remained in the same configuration since 1994.

As discussed in the Phase I ESA for 1413 Cole Place, based on available historical resources, the portion of the Project Site located on 1413 Cole Place consisted of vacant parcels of land prior to 1907, and then occupied by single-family residences up until 1950. By 1950, the northern portion of the property was redeveloped into a retail store with the remainder of the property occupied by single-family residences. By 1961, the remaining residence was converted into an office building. By 1966, the property was occupied by an office building and single-family residence. By 1968, the office building had been converted back into a residence, and the residence was converted into a store front. In 1985, the existing structures were demolished, and the property was redeveloped into a light industrial/office building, which is currently occupied by The Post Group.

As discussed in the Phase I ESA for 1424 and 1428 Wilcox Avenue, based on available historical resources, the portion of the Project Site located on 1424 and 1428 Wilcox Avenue was occupied by single-family residences from prior to 1907 until around 1945. By 1945, the properties facing Wilcox Avenue were occupied by retail stores, while the properties facing Cole Place were occupied by single-family residences. By 1957, the western portion of the property facing Wilcox Avenue was occupied by retail store fronts; the eastern portion of the Project Site was occupied by an office, warehouse and optical glass grinding building occupied by the American Optical Company; and the southernmost portion of the property was occupied by a store front and single-family residences. Further changes were completed to the eastern portion of the property in 1968 and was then occupied by a musical instrument stage and rehearsal studio. By 1977, the residence and store fronts in the southernmost portion of the Project Site were developed and these properties were used as parking lots. Other entertainment industries occupied the warehouse facing Cole Place from the early 1990s until the mid-2000s. The warehouse building in the eastern portion of the property was demolished around 2008, creating automobile parking for the retail/office buildings facing Wilcox Avenue, which are currently occupied by film and television companies.

Based on a review of the relevant Munger oil and gas field maps and State of California Geologic Energy Management Division (CalGEM), formerly the California Division of Oil, Gas and Geothermal Resources (DOGGR), Well Finder GIS, the Project Site is not located within any oil or gas field, and no oil or natural gas wells were located on the Project Site.

The Phase I ESAs for the properties within the Project Site have revealed that there are no RECs or Controlled Recognized Environmental Conditions (CRECs). According to the Phase I ESA for 6450 Sunset Boulevard, the former gasoline service station and automotive repair, located at the northernmost portion of the property, is considered to be a Historical Recognized Environmental Condition (HREC). As previously mentioned, the gasoline service station and automotive repair occupied the northernmost portion of the Project Site from 1938 to 1991. Based on a review of applicable records, all of the Underground Storage Tanks (USTs), a wastewater clarifier, and automotive lifts have been removed and assessed for releases, and impacted soils were excavated in the area of the former fuel dispensers. The USTs received closure in 1991 and there were no identified releases related to the clarifier and lifts at the

time of removal. Based on a review of the closure reports for the USTs and the assessment reports for the auto garage area, this area is considered to be a HREC and is not considered a concern at this time.

Construction

Hazardous Waste Generation, Handling, and Disposal

During demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, could be used, and therefore, would require proper handling and management and, in some cases, disposal. The use, handling, storage, and disposal of these materials could increase the opportunity for hazardous materials releases and, subsequently, the exposure of people and the environment to hazardous materials. However, as previously discussed, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of potentially hazardous materials used during construction.

As discussed above, the Phase I ESA for 6450 Sunset Boulevard identified a former gasoline service station and automotive repair. Based on a review of the closure reports for the USTs and the assessment reports for the auto garage area, this area is considered to be a HREC and is not considered a concern at this time. However, as provided in the Phase I ESA for 6450 Sunset Boulevard, there may be a potential for residual contaminants in the underlying soil requiring proper handling and disposal and monitoring is recommended. In the event that contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166.⁴⁶ Specifically, SCAQMD Rule 1166 requires that an approved mitigation plan be obtained from SCAQMD prior to commencing any of the following activities: the excavation of an underground storage tank or piping which has stored volatile organic compounds (VOCs); the excavation or grading of soil containing VOC material including gasoline, diesel, crude oil, lubricant, waste oil, adhesive, paint, stain, solvent, resin, monomer, and/or any other material containing VOCs; the handling or storage of VOC-contaminated soil [soil which registers >50 parts per million (ppm) or greater using an organic vapor analyzer (OVA) calibrated with hexane] at or from an excavation or grading site; or the treatment of VOC-contaminated soil at a facility. SCAQMD Rule 1166 further requires that a copy of the approved mitigation plan be on site during the entire excavation period and that the SCAQMD executive officer be notified at least 24 hours prior to excavation. In accordance with SCAQMD Rule 1166, monitoring for VOC contamination would occur at least once every 15 minutes and VOC concentration readings would be recorded. When VOC-contaminated soil is detected, the approved mitigation plan would be implemented. Therefore, compliance with existing regulations would ensure the Project would not create a significant hazard to the public or the

⁴⁶ South Coast Air Quality Management District. Rules and Compliance, Rule 1166, www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf?sfvrsn=4, accessed December 23, 2019.

environment through reasonably foreseeable upset and accident conditions involving the handling and disposal of contaminated soil that may be encountered onsite.

In addition, according to the Phase I ESAs for the properties within the Project Site, there is no potential vapor encroachment conditions. Furthermore, there are no visible signs of mold on the Project Site and the potential for radon to be a concern is low.

Based on the above, construction of the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts associated with hazardous waste generation, handling, and disposal during construction would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Underground and Aboveground Storage Tanks

According to the Phase I ESA for 6450 Sunset Boulevard, no evidence of existing USTs or ASTs was observed on the Project Site. No other records were found that indicate the presence of any remaining USTs within the areas proposed for construction. Notwithstanding, in the unlikely event that USTs are found, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. For example, if underground storage tanks are encountered, prior to removal, applicable permits would be obtained from the LAFD. Therefore, with compliance with applicable regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts related to the potential removal of USTs during construction would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Asbestos-Containing Materials

Asbestos was widely used in the building industry starting in the late 1800s and up until the late 1970s for a variety of uses, including acoustic and thermal insulation and fireproofing, and is often found in ceiling and floor tiles, linoleum, pipes, structural beams, and asphalt. Any building, structure, surface asphalt driveway, or parking lot constructed prior to 1979 could contain asbestos or Asbestos Containing Materials (ACMs). Based on the age of the on-site buildings (i.e., constructed as early as 1940), ACMs may be present on-site. Thus, 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 areas proposed for demolition, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable regulations. With compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment. Therefore, with compliance with applicable regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts related to the removal of ACMs during demolition would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Lead-Based Paint

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

Polychlorinated Biphenyls

Typical sources of polychlorinated biphenyls (PCBs) include electrical transformer cooling oils, fluorescent light fixture ballasts, and hydraulic oil. In 1976, the USEPA banned the manufacture and sale of PCB-containing transformers. According to the Phase I ESAs for the properties on the Project Site, one electrical transformer was observed at 6450 Sunset Boulevard that appeared to be in good condition with no visible evidence of leakage. No other equipment likely to contain PCBs was observed on the Project Site. In the event that PCBs are found within areas proposed for demolition, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. Therefore, with compliance with applicable regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts related to the removal of PCBs during demolition would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Oil Wells and Methane

As described above, based on a review of the Munger oil and gas field maps and CalGEM Well Finder GIS, the Project Site is not located within any oil or gas field, and no oil or natural gas wells were located on the Project Site. The Project Site is also not found to be located within a designated Methane Zone or Methane Buffer Zone mapped by the City.

Operation

Hazardous Waste Generation, Handling, and Disposal

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in commercial uses. As stated previously, activities involving the handling and disposal of hazardous wastes would occur in compliance with all applicable federal, state, and local requirements concerning the handling and disposal of hazardous waste. Therefore, with compliance with applicable regulations and requirements, operational activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts associated with hazardous waste generation, handling, and disposal during operation of the Project would be less than significant. No further analysis of this topic in an EIR is required.

Underground and Aboveground Storage Tanks

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

Asbestos-Containing Materials

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

Lead-Based Paint

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

Polychlorinated Biphenyls

In accordance with existing regulations which ban the manufacture of PCBs, the new electrical systems to be installed as part of the Project would not contain PCBs. Therefore, during operation of the Project, maintenance of such electrical systems would not expose people to PCBs and operation of the Project

would not expose people to any risk resulting from the release of PCBs in the environment. Therefore, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and no impacts related to PCBs during Project operation would occur. No further analysis of this topic in an EIR is required.

Oil Wells and Methane Gas

The Project does not include the installation of oil wells. As such, operation of the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and no impacts associated with oil wells during operation would occur. The Project is not within a Methane Zone or Methane Buffer Zone identified by the City. Therefore, there is a negligible risk of subsurface methane release. No further analysis of these topics in an EIR is required.

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

Less Than Significant Impact. The Blessed Sacrament School is located within 0.25 mile of the Project Site. Although the Project would have the potential to emit and would involve the handling of hazardous materials, particularly during construction activities, all such activities involving the handling and disposal of hazardous materials and wastes would occur in compliance with all applicable federal, state, and local requirements concerning the handling and disposal of hazardous waste. Therefore, with compliance with relevant regulations and requirements, the Project would not create a significant hazard to nearby schools, and impacts regarding the Project's emission or handling of hazardous materials and wastes would be less than significant. No mitigation measures and no further analysis of this topic in an EIR are required.

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

Less Than Significant Impact. Section 65962.5 of the California Government Code requires the California Environmental Protection Agency to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While Section 65962.5 makes reference to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of multiple agencies. The Phase I ESA for the Project Site included the results of consultation with local agency representatives and a review of available federal, State, and local databases. The report documents findings of various federal, state, and local regulatory database searches regarding properties with known or suspected releases of hazardous materials or petroleum hydrocarbons.

Based on the Environmental Data Resources (EDR) database records search, portions of the Project Site are listed on hazardous materials or hazardous wastes databases. Specifically, the portion of the property located at 6450 Sunset Boulevard is listed on the HAZNET, CERS HAZ WASTE, SWEEPS UST, HIST UST, CA FID UST, RCRA, NonGen/NLR, FINDS and ECHO governmental databases. The property is listed within the UST databases due to the former gasoline service station that was previously

located on the property. The RCRA NonGen/NLR, FINDS and ECHO are related to the existing Staples and are typical for this business.

The portion of the Project Site located at 1428 Wilcox Avenue is listed under the HAZNET governmental environmental databases for Plain Rap Press. In addition, 1433 Cole Place is listed in the LAFD Historical UST database. A review of the LAFD records reported that the tank was not a UST, but rather an Above Ground Tank (AST). This tank was reported to be a 1,150-gallon atmospheric tank (pressure vessel) and interpreted to be containing LPG to fuel delivery trucks. Based on this information, there is a low potential for environmental impact to the Project from the reported AST. In regard to the HAZNET record, the hazardous waste tracking system has no records for disposal. It is likely that the EPA number was not used for disposal and currently is an inactive number and not a concern.

Therefore, based on the above, the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard, and impacts regarding this threshold would be less than significant. No mitigation measures are required. No further analysis of this topic in an EIR is required.

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

No Impact. The Project Site is not located within an airport land use plan or within 2 miles of an airport. The closest airport to the Project Site is the Burbank Bob Hope Airport, located approximately 7.3 miles from the Project Site. Given the distance between the Project Site and the nearest airport, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. According to the Safety Element of the City of Los Angeles General Plan, the nearest disaster route to the Project Site is Santa Monica Boulevard, which is located approximately 0.5 mile south of the Project Site and the US-101, which is located less than 1 mile east of the Project Site. In addition, the Project Site is located just north of the LAPD's West Bureau and the Hollywood Community Police Station, which is located at 1358 N. Wilcox Avenue, and northwest of LAFD Fire Station No. 27, located at 1327 North Cole Avenue.^{47,48} While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site Project-related construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. The Project would coordinate

⁴⁷ Los Angeles Police Department, Hollywood Community Police Station, http://lapdonline.org/hollywood_community_police_station, accessed April 23, 2020.

⁴⁸ Los Angeles Fire Department, Fire Station No. 27, www.lafd.org/fire-stations/station-27, accessed August 20, 2020.

with LAPD and LAFD to address any potential construction related impacts on access to and from the nearby LAPD and LAFD stations. Accordingly, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan. Impacts would be less than significant, and no mitigation measures are required.

Operation of the Project would generate traffic in the Project vicinity and would result in some modifications to site access. However, the Project would comply with LAFD access requirements and would not impede emergency access in the vicinity of the Project Site. Furthermore, as discussed above, the closest disaster routes include Santa Monica Boulevard and the US-101, which are both within 1 mile of the Project Site. Thus, the Project would not cause an impediment along the City’s designated disaster routes or impair the implementation of the City’s emergency response plan. Impacts related to the implementation of the City’s emergency response plan would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

No Impact. There are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone, nor is it located within a City-designated fire buffer zone. Therefore, the Project would not exacerbate conditions that would subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. Specifically, Section 57.106.5.2 of the LAMC provides that the Fire Chief shall have the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; Section 57.118 of the LAMC establishes LAFD’s fire/life safety plan review and LAFD’s fire/life safety inspection for new construction projects; and Section 57.507.3.1 establishes fire water flow standards. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

X. HYDROLOGY AND WATER QUALITY

	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

The following analysis is based, in part, on the *Sunset and Wilcox Hydrology and Water Quality Report* prepared for the Project by KPFF Consulting Engineers, dated August 2020 and included as Appendix IS-6 of this Initial Study.

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

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

Surface Water Quality

Construction

As discussed in the Hydrology and Water Quality Report, construction activities such as earth moving, maintenance/operation of construction equipment, potential dewatering, and handling/storage/disposal of materials could contribute to pollutant loading in stormwater runoff. 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 one acre

of soil, the Project would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. In accordance with the requirements of the NPDES Construction General Permit, the Project would prepare and implement a site-specific Stormwater Pollution Prevention Plan (SWPPP) adhering to the California Stormwater Quality Association BMP Handbook. The SWPPP would specify Best Management Practices (BMPs) to be used during construction to manage stormwater and non-stormwater discharges. BMPs would include but not be limited to: erosion control, sediment control, non-stormwater management, and materials management BMPs. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion.

As previously discussed, the Project would include excavation of the Project Site to a depth of approximately 52 feet below grade on the north portion of the Project Site and 23 feet below grade on the southern portion of the Project Site. As provided in the Geotechnical Feasibility Report included in Appendix IS-3 of this Initial Study, groundwater was encountered at depths between 52.2 and 60.5 feet below grade. Therefore, groundwater may be encountered during Project construction and dewatering⁴⁹ could occur. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with the NPDES permit. The temporary system would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations. Furthermore, if dewatering is required, the treatment and disposal of the dewatered water would occur in accordance with the requirements of the Los Angeles Regional Water Quality Control Boards' (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.

Based on the above, with compliance with NPDES requirements and City's grading permit regulations, construction of the Project would not result in discharges that would violate any surface water quality standard or waste discharge requirements. Thus, temporary construction-related impacts on surface water quality would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

Operation of the Project would introduce sources of potential stormwater pollution that are typical of commercial uses (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with vehicular circulation areas). Stormwater runoff from precipitation events could potentially carry urban pollutants into municipal storm drains. Anticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. Under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspired, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the 85th percentile storm event. Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of infiltration and capture and use BMPs as established by the LID Manual. The implementation of BMPs

⁴⁹ Dewatering operations are practices that discharge non-stormwater, such as groundwater, that must be removed from a work location into a drainage system to proceed with construction. Discharges from dewatering operations can contain high levels of fine sediments, which, if not properly treated, could lead to exceedance of the NPDES requirements.

required by the City's LID Ordinance would target the pollutants that could potentially be carried in stormwater runoff. As discussed in the Hydrology and Water Quality Report, since it appears there are currently no existing onsite BMPs, stormwater run-off during post-Project conditions would result in improved surface water quality. Therefore, with the incorporation of LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. Impacts to surface water quality during operation of the Project would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Groundwater Quality

Construction

As provided in the Geotechnical Feasibility Report included in Appendix IS-3 of this Initial Study, groundwater beneath the Project Site has been encountered between 52.2 and 60.5 feet below grade. Development of the Project would include excavations to a maximum depth of 52 feet below grade on the northern portion of the Project Site and 23 feet below grade on the southern portion of the Project Site. Therefore, as previously discussed, groundwater may be encountered during Project construction and dewatering operations could occur. In the event dewatering is required during Project construction, a temporary dewatering system would be installed and operated in accordance with NPDES requirements. Any discharge of groundwater during construction of the Project would occur pursuant to, and comply with, the applicable NPDES permit or industrial user sewer discharge permit requirements. Pursuant to such requirements, the groundwater extracted would be chemically analyzed to determine the appropriate treatment and/or disposal methods. As such, groundwater quality would not be impacted from these potential dewatering activities.

Other potential effects to groundwater quality could result from the presence of an underground storage tank (UST) or during the removal of a UST. While no UST or USTs are anticipated to be present within the Project Site, in the unlikely event that USTs are found, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. For example, if underground storage tanks are encountered, prior to removal, applicable permits would be obtained from the LAFD to ensure handling and removal in accordance with applicable standards. Therefore, USTs would not pose a significant hazard on groundwater quality.

There are also risks associated with contaminated soil impacting groundwater quality. In the event contaminated soils are encountered during construction, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166. Therefore, compliance with existing regulations would ensure the Project would not create a significant hazard to groundwater quality associated with potentially contaminated soil.

During on-site grading and building construction, hazardous materials, such as fuels, oils, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the potential for hazardous materials to be released into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste, would reduce the potential for the construction of the Project to release contaminants into groundwater.

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

Operation

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

Operational activities that could affect groundwater quality include spills of hazardous materials and leaking underground storage tanks. Surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner, thereby resulting in little threat to groundwater. Other types of risks such as leaking USTs have a greater potential to affect groundwater. The Project would not include the installation of USTs that would have the potential to expose groundwater to contaminants. In addition, the Project would comply with all applicable existing regulations that 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. Therefore, operation of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements. The Project's potential impact on groundwater quality during operation would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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

Construction

No water supply wells are located at the Project Site or within 1 mile of the Project Site that could be impacted by construction, nor would the Project include the construction of water supply wells. Development of the Project would include excavations to a maximum depth of 52 feet below ground surface on the northern portion of the Project Site and 23 feet below ground surface on the southern portion of the Project Site. As provided in the Geotechnical Feasibility Report included in Appendix IS-3 of this Initial Study, groundwater was encountered at varying depth between 52.2 and 60.5 feet. Therefore, groundwater may be encountered during Project construction and dewatering could occur. In the event dewatering is required, due to the limited and temporary nature of dewatering operations, impacts to groundwater supplies and management of the basin are not considered to be significant. Furthermore, the Project Site is virtually impervious (approximately 96.2 percent) in the existing condition and there is minimal groundwater recharge potential. Therefore, construction of the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project

may impede sustainable groundwater management of the basin. Impacts on groundwater supplies during construction of the Project would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

As previously discussed, the Project Site is currently approximately 96.2 percent impervious. The Project would develop hardscape and structures that cover virtually the entire Project Site with impervious surfaces, and therefore the groundwater recharge potential will remain minimal. Furthermore, the Project's BMPs would control stormwater runoff with no increase in runoff resulting from the Project. Also, the Project would not include the installation of water supply wells and there are no existing wells or spreading ground within 1 mile of the Project Site. Therefore, the Project 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 are required. No further evaluation of this topic in an EIR is required.

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

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

Less Than Significant Impact. The Project Site is not crossed by any water courses or rivers. Construction activities for the Project would include demolition of existing structures and hardscape and the excavation and removal of soil. These activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as discussed above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. These BMPs are designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. In addition, Project construction activities would occur in accordance with City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, through compliance with all NPDES General Construction Permit requirements, including preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. As such, construction-related impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

As previously discussed, the Project Site is currently comprised of approximately 96.2 percent impervious surfaces under existing conditions. At buildout of the Project, the Project Site would be comprised of approximately 98.6 percent impervious areas. 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 would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. There are no streams or rivers that cross the Project Site. As previously discussed, construction activities 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. As discussed above in Response to Checklist Question X.a, the Project would implement a SWPPP that specifies BMPs and erosion control measures used during construction to manage runoff flows. These BMPs are designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. Thus, through compliance with all NPDES General Construction Permit requirements and compliance with applicable City grading permit regulations, construction activities for the Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. As such, construction-related impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

As previously discussed, the Project Site is currently comprised of approximately 96.2 percent impervious surfaces under existing conditions. At buildout of the Project, the Project Site would be comprised of approximately 98.6 percent impervious areas. As detailed in the Hydrology and Water Quality Report, a comparison of the pre- and post-Project peak flow rates indicates a 0.1 percent increase in stormwater runoff from the Project Site. However, as the Project Site currently does not have BMPs for the management of pollutants or runoff, the Project BMPs would control stormwater runoff and ultimately result in a minor decrease in runoff compared to existing conditions. As such, the Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on-site or off-site. Operational impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed above, the Project would result in a minimal increase in the imperviousness of the Project Site. As detailed in the Hydrology and Water Quality Report, a comparison of the pre- and post-Project peak flow rates indicates a 0.1 percent increase in stormwater runoff from the Project Site. However, as the Project Site currently does not have BMPs for the management of pollutants or runoff, the Project BMPs would control stormwater runoff and ultimately result in a minor decrease in runoff compared to existing conditions. Consequently, the Project would decrease the amount of stormwater runoff discharging into the existing storm drainage infrastructure. In addition, the implementation of BMPs required by the City's LID Ordinance would target the pollutants that could potentially be carried in stormwater runoff. Therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iv. Impede or redirect flood flows?

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

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

Less Than Significant Impact. As discussed above, the Project Site is not located within a 100-year flood hazard area as mapped by FEMA or by the City. In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a tsunami hazard area. Therefore, no tsunami or tsunami events would be expected to impact the Project Site. Additionally, there are no standing bodies of water near the Project Site that may experience a seiche.

Earthquake-induced flooding can result from the failure of dams or other water-retaining structures resulting from earthquakes. The Safety Element of the City of Los Angeles General Plan shows that the Project Site is located in the potential inundation area for the Hollywood Reservoir, which is held by the Mulholland Dam.⁵² The Mulholland Dam is a Los Angeles Department of Water and Power (LADWP) dam located in the Hollywood Hills. The Mulholland Dam was built in 1924 and designed to hold 2.5 billion gallons of water. Dam safety regulations are the primary means of reducing damage or injury due to inundation occurring from dam failure. The Mulholland 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. Specifically, the California Division of Safety of Dams regulates the siting, design, construction, and periodic review of all dams in the State. In addition, LADWP operates the dams in in the Project Site area and mitigates the potential for over flow and seiche hazard through control of water levels and dam wall height. These measures include seismic retrofits and other related dam improvements completed under the requirements of the 1972 State Dam Safety Act. The City's Local Hazard Mitigation Plan, which was adopted in July 2011, provides a list of existing programs, proposed activities and specific projects that may assist the City in reducing risk and preventing loss of life and property damage from natural and human-cause hazards including dam failure. The Hazard Mitigation Plan evaluation of dam failure vulnerability classifies dam failure as a moderate risk. Given the oversight by the Division of Safety of Dams, including regular inspections, and the LADWP's emergency response program, the potential for substantial adverse impacts related to inundation at the Project Site as a result of dam failure would be less than significant. Additionally, as discussed above, the Project would include new structural BMPs throughout the Project Site which would reduce the amount of pollutants entering the stormwater system and groundwater. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

⁵⁰ Federal Emergency Management Agency, Flood Insurance Rate Maps, Panel Numbers 06037C1636G, effective December 21, 2018.

⁵¹ Los Angeles General Plan Safety Element, November 1996, Exhibit F, 100-Year & 500-Year Flood Plains, p. 57.

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

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

Less Than Significant Impact. Under Section 303(d) of the Clean Water Act, states are required to identify water bodies that do not meet their water quality standards. Biennially, the Los Angeles Regional Water Quality Control Board (LARWQCB) prepares a list of impaired waterbodies in the region, referred to as the 303(d) list. The 303(d) list outlines the impaired waterbody and the specific pollutant(s) for which it is impaired. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL). As discussed in the Hydrology and Water Quality Report, the Project Site is located within the Ballona Creek Watershed. According to the State Water Resources Control Board (SWRCB), constituents of concern listed for the Ballona Creek Watershed under California’s Clean Water Act Section 303(d) List include cadmium (sediment), chlordane (tissue and sediment), copper (dissolved), cyanide, lead, PCBs, silver, toxicity, trash, viruses (enteric), and zinc.

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

Potential pollutants generated by the Project would be typical of commercial and office land uses and may include sediment, nutrients, pesticides, trash and debris, oil and grease, and metals. The implementation of BMPs required by the City’s LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Since the existing Project Site does not have any structural or LID BMPs to treat or infiltrate stormwater, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. As such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans for the Ballona Creek Watershed. With compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XI. LAND USE AND PLANNING

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

a. Would the project physically divide an established community?

Less than Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is bound by Sunset Boulevard to the north, Cole Place to the east, De Longpre Avenue to the south, and Wilcox Avenue to the west. The Project Site is currently developed with three commercial buildings and surface parking. The Project Site is within a vibrant commercial area in the Hollywood Community Plan Area. The area surrounding the Project Site is developed primarily with a mix of low- to high-intensity residential, commercial, and mid-rise office buildings, which vary widely in building style and period of construction. Land uses adjacent to the Project Site include the Rise Hollywood mixed-use development, the Los Angeles Police Department Hollywood Station, and Los Angeles Fire Department Station 27 south of the Project Site, the 14-story CNN building east of the Project Site, and an 11-story office building located west of the Project Site.

The Project would remove and replace the existing commercial buildings and surface parking areas on the Project Site with a new commercial development containing restaurant and office uses. These uses would be consistent with other office and commercial developments located adjacent to and in the general vicinity of the Project Site. All proposed development would also occur within the boundaries of the Project Site, including a 2,275-square-foot merger of the public right-of-way along a portion of Wilcox Avenue. In addition, the Project does not propose a freeway or other large infrastructure that would divide the existing surrounding community. Therefore, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project requires several discretionary approvals including, but not limited to, a Height District Change, a Vesting Conditional Use Permit, a Master Conditional Use Permit, a Site Plan Review, Project Permit Compliance Review, and a Vesting Tentative Tract Map. The Project could potentially conflict with land use plans, policies or regulations that were adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, further evaluation of this topic in an EIR is required.

XII. MINERAL RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey.^{53,54,55} The Project Site is also not located within a City-designated oil field or oil drilling area.⁵⁶ Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. See Response to Checklist Question XII.a, Mineral Resources, above.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

⁵³ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

⁵⁴ State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.

⁵⁵ City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.

⁵⁶ City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit E, November 26, 1996, p. 55.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

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

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

Potentially Significant Impact. Construction of the Project could generate groundborne noise and vibration associated with demolition, site grading and excavation, other clearing activities, the installation of building footings, and construction truck travel. As such, the Project would have the potential to generate excessive groundborne vibration and noise levels during short-term construction activities. Therefore, further evaluation of this topic will be provided in the EIR. Due to the proposed land uses and vibration characteristics (rapid attenuation based on distance from source), operation of the Project would not be anticipated to result in operational vibration impacts. However, this topic will be discussed further in the EIR.

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

No Impact. The Project Site is not located in the vicinity of a private airstrip, an airport land use plan, or within 2 miles of an airport. The closest airport to the Project Site is Bob Hope Airport, located approximately 7.3 miles from the Project Site. As such, the Project would not expose people residing or working in the Project area to excessive noise levels. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XIV. POPULATION AND HOUSING

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

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

Less Than Significant Impact. The Project is a commercial development consisting of commercial and office uses. Since the Project does not propose a housing component, it would not directly induce a new residential population that would contribute to population growth in the vicinity of the Project Site. Additionally, while construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project.

Operation of the Project would generate new employment positions, which could result in increased population growth in the area. As discussed in Section 3, Project Description, of this Initial Study, the Project includes the development of a 15-story commercial building with a total floor area of 443,418 square feet consisting of 431,032 square feet of office space and 12,386 square feet of ground floor restaurant space. However, to provide a conservative analysis of the Project's environmental impacts, this Initial Study assumes the approximately 1,800 square feet of outdoor covered patio areas adjacent to the ground floor restaurant space along Sunset Boulevard would count as floor area, resulting in a total floor area of 445,218 square feet, including 431,032 square feet of office space and 14,186 square feet of restaurant space. As the Project would remove the existing approximately 26,261 square feet of office and retail uses, the Project, under this conservative analysis, would result in a net increase in floor area of 418,957 square feet. Based on employee generation rates promulgated by the City of Los Angeles VMT Calculator Documentation, the Project's net increase in floor area of 418,957 square feet would generate approximately 1,710 net new employees.⁵⁷ As noted above, the Project would not introduce new homes

⁵⁷ Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the "General Office" employee generation rate of 4 employees per 1,000 square foot applied to the proposed (431,032 square feet) and existing (9,329 square feet) office uses, the "High-Turnover-Sit-Down Restaurant" employee generation rate of 4 employees per 1,000 square foot applied to the (Footnote continued on next page)

at the Project Site and would therefore not result in a direct population growth in the area. While some of the new employment positions could be filled by persons who would relocate to the vicinity of the Project Site, this potential increase in population would not be substantial since not all employees would move close to the Project Site. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project Site and other persons would commute to the Project Site from other communities in and outside of the City.

According to SCAG's 2016–2040 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2020 is approximately 1,831,457 employees.⁵⁸ As projected by the 2016–2040 RTP/SCS, in 2026, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,932,750 employees.⁵⁹ Therefore, the projected employment growth in the City between 2020 and 2026 based on SCAG's 2016–2040 RTP/SCS is approximately 101,293 employees. The Project's 1,710 estimated net new employees would constitute approximately 1.7 percent of the employment growth forecasted in SCAG's 2016–2040 RTP/SCS between 2020 and 2026. According to SCAG's 2020–2045 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2020 is approximately 1,887,969 employees.⁶⁰ In 2026, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,947,972 employees.⁶¹ Therefore, the projected employment growth in the City between 2020 and 2026 based on SCAG's 2020–2045 RTP/SCS is approximately 60,003 employees. The Project's 1,710 estimated net new employees would constitute approximately 2.85 percent of the employment growth forecasted between 2020 and 2026.

Overall, the provision of new jobs would constitute a small percentage of employment growth and would not be considered "unplanned growth" and would not produce such a high quantity of new jobs that it would have the possibility to induce unplanned residential growth. Therefore, the Project would not cause an exceedance of SCAG's employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities. As such, given that the Project would not directly contribute to substantial unplanned population growth in the Project area through the development of residential uses and as some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site or who would commute, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Further, as the Project would be located in a highly developed area with an established network of roads

proposed restaurant uses (14,186 square feet), and the "General Retail" employee generation rate of 2 employees per 1,000 square foot applied to the existing 16,932 square feet of retail uses to be removed.

⁵⁸ Based on a linear interpolation of 2012 and 2040 data. The 2020 extrapolated value is calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to 2020: $((2,169,100 - 1,696,400) \div 28) * 8) + 1,696,400 = 1,831,457$.

⁵⁹ Based on a linear interpolation of 2012 and 2040 data. The 2026 extrapolated value is calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to 2026: $((2,169,100 - 1,696,400) \div 28) * 14) + 1,696,400 = 1,932,750$.

⁶⁰ SCAG. ConnectSoCal (2020–2045 RTP/SCS), Demographics and Growth Forecast Appendix, Table 14, page 35. Based on a linear interpolation of SCAG's employment data for 2016 and 2045 data. The 2020 extrapolated value is calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to 2020: $((2,135,900 - 1,848,300) \div 29) * 4) + 1,848,300 = 1,887,969$.

⁶¹ SCAG. ConnectSoCal (2020–2045 RTP/SCS), Demographics and Growth Forecast Appendix, Table 14, page 35. Based on a linear interpolation of 2016 and 2045 data. The 2026 extrapolated value is calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to 2026: $((2,135,900 - 1,848,300) \div 29) * 10) + 1,848,300 = 1,947,472$.

and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth.

Based on the above, the Project would not induce substantial population or housing growth. Impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As no housing currently exists on the Project Site, the Project would not displace any persons or existing housing. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XV. PUBLIC SERVICES

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

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

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

Potentially Significant Impact. The LAFD provides fire protection and emergency medical services for the Project Site. The Project would increase the building square footage on Project Site and introduce a high-rise structure, which has the potential to result in an increased demand for fire protection services and associated facilities. Therefore, further analysis of this issue will be included in the EIR.

b. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental

facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?

Asbestos-Containing Materials

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

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

Less Than Significant Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). LAUSD is divided into six local districts. The Project Site is located in Local District–West. As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of students within the service area of LAUSD. In addition, the number of students that may be indirectly generated by the Project that could attend LAUSD schools serving the Project Site would not be anticipated to be substantial because not all employees of the Project are likely to reside in the vicinity of the Project Site. Furthermore, pursuant to Senate Bill 50, the Project Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Thus, the Project would not result in the need for new or altered school facilities. Therefore, impacts would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

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

Less Than Significant Impact. Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. Nearby parks and recreational facilities within an approximate 2-mile radius of the Project Site include: Selma Park (0.2 mile northwest); De Longpre Park (0.3 mile southeast); Hollywood Pool and Recreation Center (0.4 mile south); Yucca Park and Community Center (0.49 mile north); Las Palmas Senior Citizen Center (0.59 mile north); Carlton Way Park (0.7 mile east); Dorothy and Benjamin Park (0.8 mile Franklin–Ivar Park (0.7 mile northeast); Seily Rodriguez Park (1.0 mile southeast); Runyon Can Park and Dog Park (1.15 miles north); Poinsettia Recreation Center (1.32 miles south); La Mirada Park (1.37 miles east); Wattles Mansion and Gardens and Garden Park (1.47 miles northeast); Lemon Grove Recreation Center (1.71 miles east); and Robert L. Burns Park (1.73 miles south).

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. As discussed above, based on employee generation rates promulgated by the City of Los Angeles VMT Calculator Documentation,⁶² the Project would generate approximately 1,710 net new employees. These new employment opportunities that could be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create a demand for parks and recreational facilities. The Project would include several open space areas consisting of private landscaped outdoor terraces on the various upper levels, which would offset the demand for parks and recreational facilities for the new employees. While it is possible that some of the new employees that could be generated by the Project may utilize local parks and recreational facilities, this increased demand would be negligible due to the amount of time it would take for employees to access off-site local parks. In addition, Project employees would be more likely to use parks near their homes during non-work hours. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, while the Project's employment opportunities could have the potential to indirectly increase the population of the Hollywood Community Plan area, new demand for public parks and recreational facilities associated with Project development would be limited. Thus, impacts on parks would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

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

Potentially Significant Impact. Other public facilities provided to the Project Site include library services and use of public roadways.

The Los Angeles Public Library (LAPL) provides library services to the City through its Central Library, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through Web-based resources. The Project area is served by existing LAPL facilities including the Will and Ariel Durant Branch Library (1.0 mile west), Francis Howard Goldwyn–Hollywood Regional Library (0.3 mile north), and the John C. Fremont Branch Library (1.2 miles south). As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of residents within the service population of the local LAPL facilities. Notwithstanding, the Project may generate an indirect demand for library services, and further consultation with the LAPL is required. As such, this topic will be further evaluated in the EIR.

⁶² Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the "General Office" employee generation rate of 4 employees per 1,000 square foot applied to the proposed (431,032 square feet) and existing (9,329 square feet) office uses, the "High-Turnover-Sit-Down Restaurant" employee generation rate of 4 employees per 1,000 square foot applied to the proposed restaurant uses (14,186 square feet), and the "General Retail" employee generation rate of 2 employees per 1,000 square foot applied to the existing 16,932 square feet of retail uses to be removed.

During construction and operation of the Project, roads would continue to be utilized to access the Project Site. As discussed below in Checklist Question XVI.a, further analysis of the potential for the Project to result in a significant increase in the number of vehicle trips on local roadways will be evaluated in the transportation section of the EIR. Any necessary improvements to local roadways associated with development of the Project will also be identified in the transportation section of the EIR.

XVI. RECREATION

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

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

Less Than Significant Impact. As discussed in the Response to Checklist Question XV(d) above, the Project does not propose the development of residential uses which would create a demand on nearby parks and/or recreational facilities. As discussed above, based on employee generation rates promulgated by the City of Los Angeles VMT Calculator Documentation,⁶³ the Project would generate approximately 1,710 net new employees. These new employment opportunities that could be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create a demand for parks and recreational facilities. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks and recreational facilities. In addition, Project employees would be more likely to use parks near their homes during non-work hours. The Project would also include several open space areas consisting of private landscaped outdoor terraces on the various upper levels, which would offset the demand for parks and recreational facilities. Therefore, the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. The impact on parks and recreational facilities would be

⁶³ Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the "General Office" employee generation rate of 4 employees per 1,000 square foot applied to the proposed (431,032 square feet) and existing (9,329 square feet) office uses, the "High-Turnover-Sit-Down Restaurant" employee generation rate of 4 employees per 1,000 square foot applied to the proposed restaurant uses (14,186 square feet), and the "General Retail" employee generation rate of 2 employees per 1,000 square foot applied to the existing 16,932 square feet of retail uses to be removed.

less than significant, and mitigation measures are not required. No further evaluation of this topic in an EIR is required.

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

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

XVII. TRANSPORTATION

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

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

Potentially Significant Impact. A Transportation Assessment (TA) in accordance with LADOT’s Transportation Assessment Guidelines (TAG) adopted in July 2019 will be prepared for the Project. In accordance with the TAG and consistent with the City CEQA Transportation Thresholds (adopted July 30, 2019), the TA’s CEQA-required analyses will include an assessment of whether the Project would result in potential conflicts with transportation-related plans, ordinances, or policies. The results of the TA will be included in the EIR.

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

Potentially Significant Impact. SB 743, which went into effect in January 2014, requires the Governor’s Office of Planning and Research to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis has shifted from driver delay, which is typically measured by traffic level of service (LOS), to a new measurement that better addresses

the State's goals on reduction of greenhouse gas emissions, creation of a multi-modal transportation, and promotion of mixed-use developments. CEQA Guidelines Section 15064.3 states that vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts, replacing LOS.

On July 30, 2019, the City adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its Transportation Assessment Guidelines (July 2019), which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743. The Project would develop new office and commercial restaurant uses on the Project Site. As a result, VMT would increase over existing conditions. Therefore, further analysis of this issue will be provided in the EIR.

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

Asbestos-Containing Materials

No Impact. The Project's design does not include hazardous geometric design features (e.g., sharp curves or dangerous intersections). The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections, and the development of the Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. In addition, the proposed driveways along both Wilcox Avenue and Cole Place would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access. The Project specifically includes four driveways to meet the various needs of the Project, including separate driveways for office tenants, rideshare and valet users, loading and trash operations, and for access to the LADWP equipment building. Two driveways are located on Wilcox Avenue and two driveways are located on Cole Place. The proposed driveways would not create hazards to the surrounding streets. The proposed uses would also be consistent with the surrounding uses (i.e., residential and commercial) and would not introduce hazards due to incompatible uses. Thus, the Project would not substantially increase hazards due to a geometric design feature or incompatible uses. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. While it is expected that the majority of construction activities for the Project would primarily be confined on-site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project does not propose the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from the surrounding streets. In addition, the Project would comply with Los Angeles Fire Department (LAFD) access requirements and applicable LAFD regulations regarding safety. Therefore, the Project would not result in inadequate emergency access to the Project Site or surrounding uses. Impacts regarding inadequate emergency access would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

XVIII. TRIBAL CULTURAL RESOURCES

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|--------------------------|
| a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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

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

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

As noted above, the Project would require excavations up to 52 feet below grade. Therefore, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with AB 52, the City will notify all applicable tribes, and the City will participate in any requested consultations for the Project. Further analysis of this topic will be provided in the EIR.

XIX. UTILITIES AND SERVICE SYSTEMS

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

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

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

With regard to storm water drainage, as discussed above in Checklist Question X, Hydrology and Water Quality, the Project would result in a decrease in stormwater flows. As such, the Project would not require or result in the relocation or construction of new or expanded storm water drainage.

With regard to telecommunications infrastructure, the Project would require construction of new on-site telecommunications infrastructure to serve the new building and potential upgrades and/or relocation of existing telecommunications infrastructure. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. Such activities could involve temporary closure of portions of sidewalks or travel lanes. However, the Project would implement a construction management plan during construction, which would ensure safe pedestrian access, as well as emergency vehicle access and safe vehicle travel in general, to reduce any temporary pedestrian and traffic impacts occurring as a result of construction activities. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration (i.e., months) and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution with minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing energy and telecommunications lines would be coordinated with service providers and the City, as applicable. Therefore, related impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

Potentially Significant Impact. LADWP supplies water to the Project Site. Given the Project's proposed uses and increase in the amount of developed floor area on the Project Site, the Project would result in an increased demand for water provided by LADWP. In addition, the Project would meet certain criteria outlined in Section 10912 of the California Water Code requiring the preparation of a Water Supply Assessment by LADWP. Therefore, further analysis of this issue will be provided in the EIR.

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

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

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

Less Than Significant Impact. While the Bureau of Sanitation generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County are categorized as either Class III or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are

disposed of in inert waste landfills.⁶⁴ Nine Class III landfills and one inert waste landfill with solid waste facility permits are currently serving the County.⁶⁵ In addition, there is one solid waste transformation facility within Los Angeles County that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery.

Based on the 2018 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the most recent report available, the total remaining permitted Class III landfill capacity in the County is estimated at 163.39 million tons. The permitted inert waste landfill serving the County is Azusa Land Reclamation. This facility has 57.72 million tons of remaining capacity and an average daily in-County disposal rate of 1,148 tons per day.⁶⁶ Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the CoIWMP Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.⁶⁷

Based on the 2018 CoIWMP Annual Report, the countywide cumulative need for Class III landfill disposal capacity through the year 2033 will exceed the 2018 remaining permitted Class III landfill capacity of 163.39 million tons. The 2018 CoIWMP Annual Report evaluated seven scenarios to increase capacity and determined that the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with existing capacity under six of the seven scenarios. The 2018 CoIWMP Annual Report concluded that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail. The City implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling.⁶⁸ The City is currently diverting 76 percent of its waste from landfills.⁶⁹ The City has adopted the goal of achieving 90 percent diversion by 2025, and zero waste by 2030.

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

⁶⁴ Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

⁶⁵ County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2018 Annual Report, December 2019. The 9 Class III landfills serving the County include the Antelope Valley Landfill, the Burbank Landfill, the Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, Savage Canyon Landfill, the Scholl Canyon Landfill, and the Sunshine Canyon City and County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

⁶⁶ County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2018 Annual Report, December 2019.

⁶⁷ County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2018 Annual Report, December 2019.

⁶⁸ City of Los Angeles, Solid Waste Integrated Resource Plan; www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s-lsh-wwd-s-zwswirp?_adf.ctrl-state=dyx77b3zz_594&_afLoop=4454670622268663#!, accessed August 21, 2020.

⁶⁹ LA Sanitation, Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s-lsh-wwd-s-r?_adf.ctrl-state=alxbkb91s_4&_afLoop=18850686489149411#!, accessed April 23, 2020.

Construction

The Project Site is currently developed with three buildings and surface parking. The existing buildings on the Project Site comprise approximately 26,261 square feet of floor area and would be removed as part of the Project. The Project, under a conservative analysis, would include the construction of a 445,218-square-foot mixed-use development consisting of 431,032 square feet of office space and 14,186 square feet of commercial uses. These uses would be provided in a single 15-story building. The Project would also construct a 3,550-square-foot building to house LADWP equipment. As shown in Table 1 on page 82, based on construction and debris rates established by the USEPA, it is anticipated that construction of the Project would generate a total of approximately 2,075 tons of demolition debris and 974 tons of construction debris, for a combined total of 3,049 tons of construction-related waste.

Pursuant to the requirements of Senate Bill 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Furthermore, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. Thus, although the total diversion rate may ultimately exceed 75 percent, this analysis conservatively assumes a diversion rate of 75 percent. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. As shown in Table 1, after accounting for mandatory recycling, the Project would result in approximately 762 tons of construction-related waste in the County's permitted inert landfill (i.e., Azusa Land Reclamation Landfill) throughout the construction period. This amount of construction and debris waste would represent approximately 0.001 percent of the Azusa Land Reclamation Landfill's existing remaining disposal capacity of 57.72 million tons. Thus, the total amount of construction and demolition waste generated by the Project would represent a small fraction of the remaining capacity at this permitted inert landfill serving Los Angeles County. Given the remaining permitted capacity at the Azusa Land Reclamation facility as well as the remaining 163.39 million tons of capacity at the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

Operation

As shown in Table 2 on page 83, upon full buildout, the Project, under a conservative analysis, would result in a net increase in solid waste generation of 714 tons per year. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as compliance with Assembly Bill 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.⁷⁰ The estimated

⁷⁰ LA Sanitation, Solid Waste Integrated Resources Plan, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?_afrcLoop=3608041245788654&_afrcWindowMode=0&_afrcWindowId=null&_adf.ctrl-state=8vrc5bges_179#!%40%40%3F_afrcWindowId%3Dnull%26_afrcLoop%3D3608041245788654%26_afrcWindowMode%3D0%26_adf.ctrl-state%3D8vrc5bges_183, accessed April 23, 2020.

**Table 1
Project Demolition and Construction Waste Generation**

Building	Size	Generation Rate (lbs/sf) ^{a,b}	Total (tons) ^b
Demolition Waste			
Existing Structures to be Removed	26,261 sf	158	2,075
<i>Demolition Waste Subtotal</i>			2,075
Construction Waste			
Office	431,032 sf	4.34	935
Commercial	14,186 sf	4.34	31
LADWP Building	3,550 sf	4.34	8
<i>Construction Waste Subtotal</i>			974
Total for Demolition and Construction Waste			3,049
Total After 75-Percent Recycling			762
<hr/> <i>lbs = pound</i> <i>sf = square feet</i> ^a U.S. Environmental Protection Agency, Report No. EPA530-R-09-002, <i>Estimating 2003 Demolition and Materials Amounts</i> , March 2009, Table A-2 and Table 2-4. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types. ^b Used conversion of 1 ton = 2,000 pounds. Numbers have been rounded. Source: Eyestone Environmental, 2020.			

annual net increase in solid waste that would be generated by the Project of 714 tons represents approximately 0.0004 percent of the remaining capacity (163.39 million tons) for the County's Class III landfills open to the City of Los Angeles.⁷¹

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

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

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991,

⁷¹ (714 tons per year/163.39 million tons) x 100 ≈ ~0.0004%

**Table 2
Estimated Project Solid Waste Generation**

Building	Size	Employee Generation Rate per sf^a	Estimated No. of Employees	Solid Waste Generation Rate^b	Total Generation (tons/year)
Existing					
Office	9,329 sf	0.004	37 emp	0.37/tons/year	14
Commercial (Retail)	16,932 sf	0.002	34 emp	2.98/tons/year	101
Total Existing					115
Proposed					
Office	431,032 sf	0.004	1,724 emp	0.37/tons/year	638
Commercial (Restaurant)	14,186 sf	0.004	57 emp	2.98/tons/year	170
LADWP Building	3,550 sf	0.002	7 emp	2.98/tons/year	21
Total with Implementation of Project					829
Total Net Increase					714
<hr/> <i>emp = employees</i> <i>sf = square feet</i> ^a <i>Employee Generation Rates from City of Los Angeles VMT Calculator Documentation, May 2020, Table 1.</i> ^b <i>City of Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study, Table 4, July 2002.</i> <i>Source: Eyestone Environmental, 2020.</i>					

which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in “zero waste” by 2030. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste⁷² 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 were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space

⁷² Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.⁷³ The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

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

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

⁷³ Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

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

No Impact (a–d). The Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Therefore, these thresholds would not apply to the Project. The Project Site is located in an urbanized area, and there are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone,⁷⁴ nor is it located within a City-designated fire buffer zone.⁷⁵ Therefore, no impacts regarding wildfire risks would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

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

⁷⁴ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5546014056, 5546014013, 5546014014, and 5546014017, <http://zimas.lacity.org/>, accessed April 20, 2020.

⁷⁵ City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.

Potentially Significant Impact. As discussed above, the Project is located in a highly urbanized area and does not serve as habitat for fish or wildlife species. In addition, no sensitive plant or animal community or special status species occur on the Project Site. Therefore, the Project would not have the potential to substantially 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.

City's Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.⁷⁶ The estimated annual net increase in solid waste that would be generated by the Project of 714 tons represents approximately 0.0004 percent of the remaining capacity (163.39 million tons) for the County's Class III landfills open to the City of Los Angeles.⁷⁷

As discussed above, the Project's potential impacts to historic resources will be evaluated in the EIR. Environmental impacts for the following subject areas will also be further analyzed in the EIR: air quality; energy; greenhouse gas emissions; land use and planning; noise; public services (fire protection, police protection, and library services); transportation; tribal cultural resources; and utilities and service systems (water, wastewater, electricity, and natural gas).

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

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

Regarding cumulative aesthetics impacts, related projects would be reviewed on a case-by-case basis by the City to comply with LAMC requirements regarding building heights, setbacks, massing and lighting or, for those projects that require discretionary actions, to undergo site-specific review regarding building density, design, and light and glare effects. Related projects are also subject to the City's design review process and review for consistency with zoning and regulatory documents governing scenic quality.

⁷⁶ LA Sanitation, Solid Waste Integrated Resources Plan, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?_afLoop=3608041245788654&_afWindowMode=0&_afWindowId=null&_adf.ctrl-state=8vrc5bges_179#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D3608041245788654%26_afWindowMode%3D0%26_adf.ctrl-state%3D8vrc5bges_183, accessed April 23, 2020.

⁷⁷ (714 tons per year/163.39 million tons) x 100 ≈ ~0.0004%

Regardless, pursuant to Senate Bill 743, Public Resources Code Section 21099, and Zoning Information File ZI No. 2452, the Project's aesthetics impacts cannot be considered significant. Given the Project Site's location in a transit priority area, other residential, mixed-use, and employment center development projects located in the vicinity of the Project Site are anticipated to be of similar aesthetic character and would not have incremental combined effects that could create a cumulatively considerable impact. Thus, cumulative impacts associated with aesthetics would be less than significant.

With regard to agriculture and forestry resources, biological resources, and mineral resources, no such resources are located on the Project Site or in the surrounding area. In addition, where applicable, other developments would be required to comply with the Migratory Bird Treaty Act to avoid impacts to nesting birds. Also, similar to the Project, where the removal of onsite trees and street trees is proposed, such developments would be required to comply with City regulations regarding tree replacement. Overall, the Project would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts. Therefore, cumulative impacts to agriculture and forestry resources, biological resources, and mineral resources would be less than significant.

With regard to potential cumulative impacts related to archaeological resources, the Project vicinity is located within an urbanized area that has been disturbed and developed over time. In the event that archaeological resources are uncovered, each related project would be required to comply with applicable regulatory requirements, including CEQA Guidelines Section 15064.5, Public Resources Code Section 21083.2, Health and Safety Code Section 7050.5, and Public Resources Code Section 5097.9. In addition, as with the Project, if human remains were discovered during construction, work in the immediate vicinity of the construction area would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with Public Resources Code Section 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Therefore, with compliance with regulatory requirements and any necessary mitigation measures, the Project and related projects would not contribute considerably to cumulative impacts on archaeological resources and human remains, and cumulative impacts to such resources would be less than significant.

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

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

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

Related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, as with the Project, related projects would be subject to the City's LID requirements. In addition, construction projects greater than one acre would be subject to NPDES permit requirements, including development of a SWPPP, SUSMP requirements during operation, and other local requirements pertaining to hydrology and surface water quality. It is anticipated that related projects would also be evaluated on an individual basis by City of Los Angeles Department of Public Works to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. Thus, Project impacts related to hydrology and water quality would not be cumulatively considerable and, cumulative impacts would be less than significant.

In terms of population and housing, related development would not induce substantial population growth in the vicinity of the Project Site since most of the area is already fully developed and occupied by a long standing residential population. In addition, not all related projects would include residential uses. As discussed in the analysis above, the Project does not propose residential uses and thus would not directly contribute to population growth. While the Project would not displace housing or people, other projects might displace existing housing and people residing in them. However, even if construction of replacement housing were required elsewhere, such developments would likely occur on infill sites within the City and the appropriate level of environmental review would be conducted to analyze the extent to which the related projects could cause significant environmental impacts. Overall, the Project's contribution would not be cumulatively considerable, and cumulative impacts related to population and housing would be less than significant.

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

demand for park facilities as a result of the Project and the related projects. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to schools or parks and recreation. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to solid waste, given the urbanized and built-out nature of most of the City, it is anticipated that other projects would similarly represent a minor percentage of the remaining capacity of the County's Class III landfills open to the City. Additionally, the demand for landfill capacity is continually evaluated by the County through preparation of the CoIWMP annual reports. Each annual CoIWMP report assesses future landfill disposal needs over a 15 year planning horizon. Based on the 2018 CoIWMP Report, the County anticipates that future disposal needs can be adequately met for the next 15 years (i.e., 2033) with implementation of strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail. The preparation of each annual CoIWMP provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Furthermore, in future years, it is anticipated that the rate of declining landfill capacity would slow considering the City's goal to achieve zero waste by 2030. Therefore, cumulative impacts with respect to solid waste would be less than significant.

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

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

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