



The Star Project

Case Number: ENV-2021-8030-EIR

Project Location: 6061–6087 Sunset Boulevard and 6056–6090 Harold Way, Los Angeles, California 90028

Community Plan Area: Hollywood Community Plan

Council District: 13—O’Farrell

Project Description: The Star Project (Project) includes the development of a commercial office building on an 87,339-square-foot (2.0-acre) site located at 6061–6087 Sunset Boulevard and 6056–6090 Harold Way (Project Site) in the Hollywood Community Plan area of the City of Los Angeles (City). The Project would provide 489,863 square feet of office uses (which includes 38,001 square feet of covered outdoor areas), 19,915 square feet of restaurant/event space, and a 14,256-square-foot screening room, resulting in a total floor area of 524,034 square feet and a floor area ratio (FAR) of approximately 6:1 upon completion of the Project. The proposed uses would be located within a 22-story building (maximum height of 420 feet). The building has been designed as a sphere that incorporates sky gardens and greenery throughout. A total of 1,287 vehicle parking spaces would be provided within a six-level subterranean parking garage and within a portion of three above-grade levels that would be fully enclosed and integrated into a three-level stepped landscaped podium. The Project would include approximately 49,252 square feet of landscaped areas and approximately 62,834 square feet of hardscaped areas for a total of approximately 112,086 square feet of outdoor areas throughout the Project Site. Four existing commercial office structures and three bungalows, totaling approximately 72,877 square feet of floor area, along with associated surface parking would be removed as part of the Project.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

Eyestone Environmental, LLC

APPLICANT:

The Star LLC

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1 INTRODUCTION

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

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

1.1 PURPOSE OF AN INITIAL STUDY

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

1.3.2 Draft EIR

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

1.3.3 Final EIR

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

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

2 EXECUTIVE SUMMARY

PROJECT TITLE	The Star
ENVIRONMENTAL CASE NO.	ENV-2021-8030-EIR
RELATED CASES	CPC-2021-8029-GPA-VZC-HD-CUB-SPR VTT-83520

PROJECT LOCATION	6061–6087 Sunset Boulevard and 6056–6090 Harold Way, Los Angeles, California 90028
COMMUNITY PLAN AREA	Hollywood Community Plan
GENERAL PLAN DESIGNATION	High Medium Residential and Highway Oriented Commercial
ZONING	R4-1VL and C4-1-SN
COUNCIL DISTRICT	13—O’Farrell

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

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

Courtney Shum, City Planner
PRINTED NAME, TITLE

June 9, 2022
DATE

EVALUATION OF ENVIRONMENTAL IMPACTS

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

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Star Project (Project) includes the development of a commercial office building on an 87,339-square-foot (2.0-acre) site located at 6061–6087 Sunset Boulevard and 6056–6090 Harold Way (Project Site) in the Hollywood Community Plan area of the City of Los Angeles (City). The Project would provide approximately 489,863 square feet of office uses,² 19,915 square feet of restaurant/event space, and a 14,256-square-foot screening room, resulting in a total floor area of 524,034 square feet and a floor area ratio (FAR) of approximately 6:1 upon completion of the Project. The proposed uses would be located within a 22-story building (maximum height of 420 feet). The building has been designed as a sphere that incorporates sky gardens and greenery throughout. A total of 1,287 vehicle parking spaces would be provided within a six-level subterranean parking garage and within a portion of three above-grade levels that would be fully enclosed and integrated into a three-level stepped landscaped podium. The Project would include approximately 49,252 square feet of landscaped areas and approximately 62,834 square feet of hardscaped areas for a total of approximately 112,086 square feet of outdoor areas throughout the Project Site. Four existing commercial office structures and three bungalows, totaling approximately 72,877 square feet of floor area, along with associated surface parking would be removed as part of the Project.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located at 6061–6087 Sunset Boulevard (Sunset Parcels) and 6056–6090 Harold Way (Harold Parcels) within the Hollywood Community Plan area of the City. The block that contains the Project Site is bounded by Harold Way to the north, Sunset Boulevard to the south, La Baig Avenue to the east and Gower Street to the west. Regional access to the Project Site is provided by the Hollywood Freeway (US-101), which is accessible approximately 0.35 mile east of the Project Site. In addition, major arterials providing regional and sub-regional access to the Project Site include Sunset Boulevard, Gower Street, Hollywood Boulevard and Vine Street. A vicinity map of the Project Site and surrounding area is provided in Figure 1 on page 8, and an aerial view of the Project Site and vicinity is included in Figure 2 on page 9.

The Project Site is located in the highly walkable Hollywood Entertainment District neighborhood of the Hollywood Community Plan area. The Project Site is also well served by a variety of public transit options. In particular, the Los Angeles County Metropolitan Transit Authority (Metro) Hollywood/Vine Station is located approximately 0.3 mile northwest of the Project Site. The Project Site is also served by bus lines primarily along Sunset Boulevard, Hollywood Boulevard and Vine Street that are operated by Metro and the Los Angeles Department of Transportation (LADOT) Downtown Area Short Hop (DASH). Metro Lines 180, 212, 217, and DASH Hollywood (HW) travel along Hollywood

² Includes 38,001 square feet of covered outdoor hardscaped and landscaped areas located on levels 10 and 17 of the building herein referred to as sky gardens.



Figure 1
Project Location Map

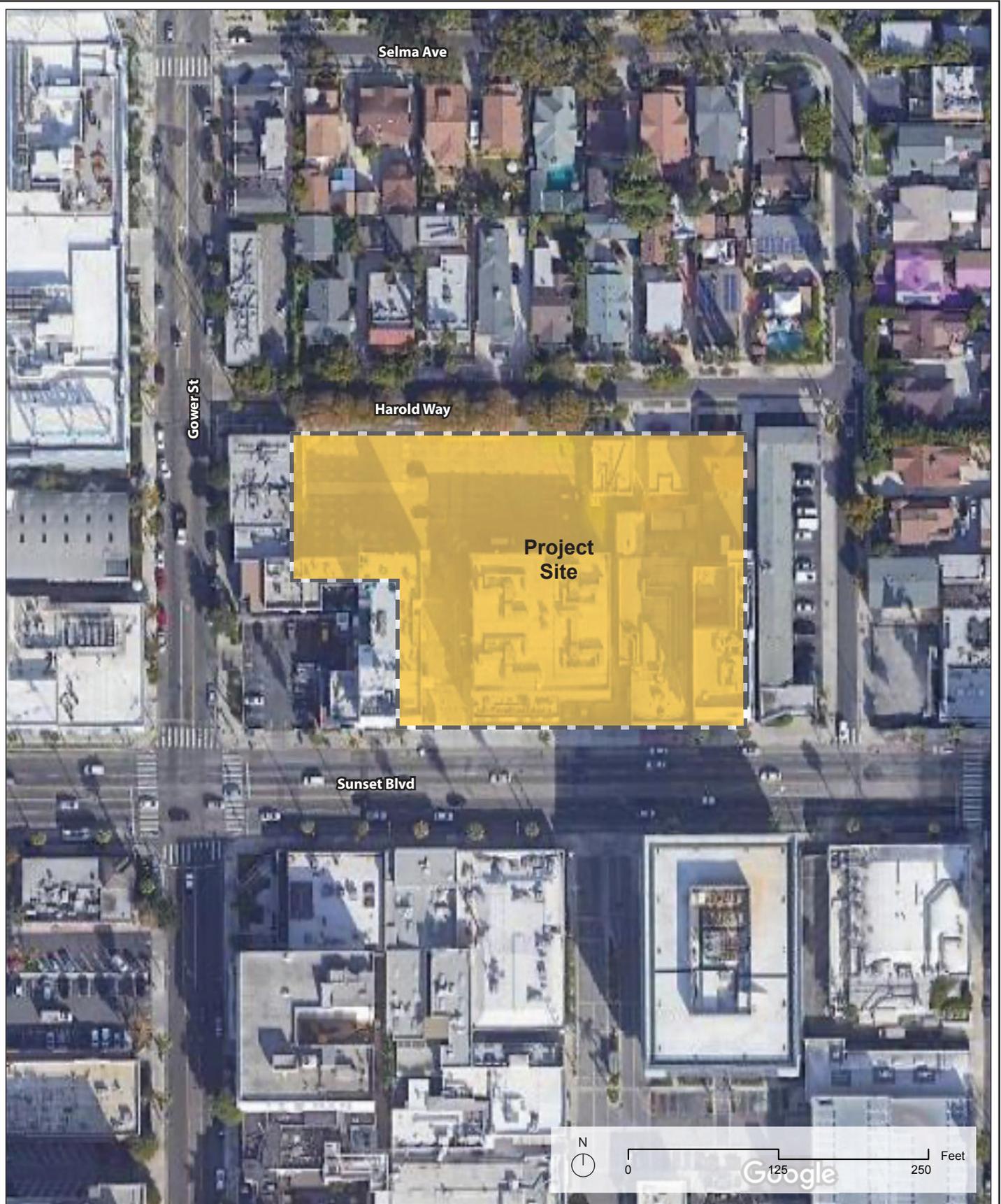


Figure 2
Aerial Photograph of the Project Site and Vicinity

Boulevard. Metro Local Line 2, DASH HW and Hollywood/Wilshire (HWL) travel along Sunset Boulevard. Metro Local Line 210 and DASH Beachwood Canyon and HWL travel along Vine Street.

3.2.2 Existing Conditions

As shown in Figure 2 on page 9, the Project Site is located between a commercial strip plaza along the western property line and a motel along the eastern property line. The Project Site is currently occupied by four commercial office buildings located at 6061, 6063, 6069, 6075, 6085, 6087 Sunset Boulevard; three bungalows located at 6056, 6062, and 6066 Harold Way; and a surface parking lot. Two of the bungalows are vacant and the third is used for office/production uses. The three bungalows have been designated as contributors to the Selma–La Baig Historic District.^{3,4} The total floor area of the existing buildings on the Project Site is approximately 72,877 square feet. Vehicular access to the Project Site is currently available via two driveways—one along Harold Way and another from Sunset Boulevard.

The Project Site elevations range from 363 feet above mean sea level at the northeast corner to 353 feet at the southwest corner for a total relief of 10 feet across the Project Site. Existing landscaping within the Project Site includes 14 trees, including one Camphor, ten Chinese elms, and three Olive trees. None of the 14 on-site trees are protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.^{5,6} In addition, there are 10 street trees within the public rights-of-way surrounding the Project Site that are not species that are protected by the Los Angeles Municipal (LAMC) (e.g., Pink Trumpet trees and Mexican Fan palms).

The Project Site is located in the Hollywood Community Plan area of the City.⁷ The Harold Parcels are located on the northern portion of the Project Site, which is designated as High Medium Residential by the Community Plan and is zoned [Q]R4-1VL (Qualified Condition, Multiple Dwelling zone, Height District 1VL). Pursuant to the LAMC, the R4 zone permits multi-family residential development, single family dwellings, apartment houses, parks, childcare facilities, churches and schools. The Height District 1VL zoning designation permits an FAR of 3:1 and a height limit of 45 feet or three stories.

³ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5545-008-011, -012, -044, <http://zimas.lacity.org/>, accessed January 12, 2022.

⁴ State of California Department of Parks and Recreation DPR523 Continuation Sheet, “Selma-Labaig District,” page 1.

⁵ Carlberg Associates, City of Los Angeles Tree Inventory Report—6061-6087 Sunset Boulevard, 6056-6090 Harold Way, Los Angeles, California 90028, June 28, 2021. See Appendix IS-1 of this IS.

⁶ Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.

⁷ The City is currently in the process of updating the Hollywood Community Plan. The most recent draft was released in February 2021 and is available at <https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update>. The City Planning Commission recommended approval of the draft plan on March 18, 2021, the Department of City Planning released the letter of determination on August 18, 2021, and the draft plan is currently awaiting consideration by the City’s Planning and Land Use Management committee.

The Sunset Parcels are located on the southern portion of the Project Site, which is designated as Highway Oriented Commercial by the Community Plan and is zoned C4-1-SN (Commercial zone, Height District 1, Sign District). The C4 zone permits a wide range of commercial uses, including office, retail, restaurant, and hotel uses, as well as any land use permitted in the R4 zone. The “1” indicates that the Project Site is located in Height District 1, which in conjunction with the C4 Zone, allows unlimited building height but limits the FAR to 1.5:1. The SN designation indicates that the Sunset Parcels are located within the Hollywood Signage Supplemental Use District (HSSUD), which establishes allowable sign regulations, in addition to those set forth in the LAMC.

The Project Site is also located within a Transit Priority Area (TPA) pursuant to Senate Bill (SB) 743. SB 743 established new rules for evaluating aesthetic and parking impacts under CEQA for certain types of projects. Specifically, Public Resources Code (PRC) Section 21099(d) states: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” TPAs are defined as areas within 0.5 mile of a major transit stop that are existing or planned. (PRC, Section 21099.) The Project qualifies as an employment center on an infill site located within a TPA, as the Project Site is within 0.5 mile of the Metro B (Red) Line Hollywood/Vine Station. Thus, in accordance with SB 743 and the City’s Zoning Information file (ZI) No. 2452, the Project’s aesthetic and parking impacts are not considered significant as a matter of law. In addition, the Project Site is also located within the boundaries of the Hollywood Redevelopment Plan and within the Los Angeles State Enterprise Zone.⁸

3.2.3 Surrounding Land Uses

The Project Site is located in Hollywood, which is an active area known for its tourist attractions and as an entertainment destination that showcases Hollywood’s history of music, film, entertainment, and dining. The Project Site itself is surrounded by a mix of uses and building types. Properties to the north along Harold Way are developed with bungalows that include residential and hotel uses, and the IO Music Academy Production School, and are zoned [Q]R4-1VL. To the south of the Project Site across Sunset Boulevard are the Sunset Gower Studios, which are zoned M1-1. To the east of the Project Site are the Hollywood Palms Inn and Suites, which are zoned [Q]R4-1VL and C4-1-SN. Properties to the west of the Project Site are developed with commercial uses including a liquor store, restaurants/cafes, and office uses and are zoned C4-1 and C4-1-SN. Other nearby uses include Emerson College Los Angeles to the southeast along Sunset Boulevard, and the Columbia Square development, which includes a 23-story tower located to the west along Sunset Boulevard.

⁸ The redevelopment plan for the Hollywood Redevelopment Project was adopted on May 20, 2003, and expires in May 2028. In September 2019, the City Council and Mayor approved a resolution and accompanying Ordinance No. 186,325, transferring the land use authority from the former CRA/LA to the City. The City is now responsible for implementing and enforcing unexpired redevelopment plans and associated development guidelines. As such, the City is the presiding agency for all land use approvals within the Hollywood Redevelopment Project area.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

As previously discussed and summarized in Table 1 on page 13, the Project includes the development of a commercial office building comprised of approximately 489,863 square feet of office uses, 19,915 square feet of restaurant/event space, and a 14,256-square-foot screening room, resulting in a total floor area of 524,034 square feet and a FAR of 6:1 upon completion of the Project. The proposed uses would be located within a 22-story building (maximum height of 420 feet) designed to create a modern architectural icon within Hollywood. The building has been designed as a sphere that incorporates sky gardens and greenery throughout each level. A total of 1,287 vehicle parking spaces would be provided within a six-level subterranean parking garage and within a portion of three levels of above-grade fully enclosed parking that would be integrated with a landscaped podium. The Project would include approximately 49,252 square feet of landscaped areas and approximately 62,834 square feet of hardscaped areas for a total of approximately 112,086 square feet of outdoor areas throughout the Project Site. Four existing commercial office structures and three bungalows, totaling approximately 72,877 square feet of floor area, along with associated surface parking would be removed as part of the Project.

3.3.2 Design and Architecture

The Project is intended to promote revitalization of Hollywood by transforming the Project Site from a mix of varied and outdated buildings and underutilized surface parking areas into an architectural icon integrated with expansive plazas and pedestrian pathways that connect to adjacent streets. As shown in the Conceptual Site Plan provided in Figure 3 on page 14, the new office building would be located along Sunset Boulevard, away from the residentially zoned properties along Harold Way.

As shown in the building sections provided in Figure 4 and Figure 5 on pages 15 and 16, the new office building would be comprised of 22 levels integrated with a three-level podium with six subterranean parking levels below. The building's roof level is designed as a fully enclosed and transparent sky dome that is programmed to include a restaurant and event space for hosting special events. The sky dome would include a transparent façade to maximize panoramic City views.

Below the roof level would be 21 floors devoted to office and associated uses, with each floor ranging in size from 10,313 square feet to 36,012 square feet. As shown in the conceptual rendering included in Figure 6 on page 17, the design of the building breaks down the overall massing by setting back each floor plate and also allows for flexible and adaptable office space layouts. In addition, two sky gardens would be located on Levels 10 and 17 and include covered outdoor hardscaped and landscaped areas connecting the indoor office environment with the outdoor environment.

The building's podium at the base would consist of three floors. The first floor (Level P1), which would be partially below grade, would provide an arrival and drop-off point on Sunset Boulevard, as well as access to the building's below grade and podium levels. The Project's lobby (Level P2) would be located on the second floor of the podium base. The upper floor of the podium (Level P3) would provide a green roof that slopes down to the Project entrance on Sunset Boulevard. The upper green roof area (Level 3 of the podium) would include a courtyard, lawn areas, a water feature, exercise loop, and garden areas. The podium level also includes two lobbies for the funicular that would

**Table 1
Existing and Proposed Floor Area**

Land Use	Floor Area
Existing (All to Be Removed)	
Three Bungalows ^a	4,780 sf
Four Commercial Office Buildings	68,097 sf
<i>Total Existing Floor Area to Be Removed</i>	<i>72,877 sf</i>
Proposed	
Office ^b	489,863 sf
Restaurant/Event Space	19,915 sf
Screening Room	14,256 sf
Total Floor Area Upon Completion of Project	524,034 sf
<hr/> sf = square feet ^a Two of the bungalows (approximately 3,000 square feet) are vacant and the third (approximately 1,780 square feet) is used for office/production uses. ^b Includes 38,001 square feet of sky gardens located on levels 10 and 17 of the building. Source: mad and Adamson Associates, Inc, 2021.	

travel along a rail located on the outer edge of the building. A double height screening room comprised of approximately 14,256 square feet would also be located on Levels P2 and P3. The screening room capacity is planned to provide for up to 300 seats. As shown in the building sections provided in Figure 4 and Figure 5 on pages 15 and 16, the majority of the Project’s parking would be provided within a six-level subterranean parking garage below the podium as well as within portions of the three fully enclosed podium levels.

As shown in the conceptual rendering provided in Figure 6 on page 17, the façade materials include colored pixelated glass that create a jewel-like pattern of geometric shapes that changes from the base of the building up through the sky dome. Lush landscaping and open spaces are provided from the building’s podium base up to the transparent rooftop dome. The building has also been designed to include a funicular cable rail to transport visitors from the green podium roof at the building’s base up to the roof level.

3.3.3 Setbacks

The Project would provide setbacks on Sunset Boulevard and Harold Way. Specifically, along Sunset Boulevard, the Project would include a 25-foot 6-inch setback measured from the property line to the building edge (or a 24-foot 2-inch setback from the property line when measured from the glass entrance to the ground floor lobby). Along Harold Way, the Project would provide a setback that would range from 1 foot 7 inches to up to 14 feet 9 inches from the property line due to the proposed undulating landscaped façade wall. The average setback from the undulating wall would be approximately 8 feet.



Figure 6
Conceptual Rendering—View from Sunset Boulevard

3.3.4 Open Space and Landscaping

Although there are no open space requirements for commercial uses, the Project would include approximately 49,252 square feet of landscaped areas and approximately 62,834 square feet of hardscaped areas for a total of approximately 112,086 square feet of outdoor areas throughout the Project Site. With their stepped back design, the Project's three podium levels include a series of landscaped areas that are integrated with the street level. As shown in Figure 7 on page 19, the upper green roof area (Level 3 of the podium) would include a courtyard, lawn areas, a water feature, exercise loop, and garden areas. The podium level also includes two lobbies for the funicular that would travel along a rail located on the outer edge of the building. The funicular would take visitors from the ground level all the way up to the building's sky dome (roof) level, with stops along the way at the Project's sky gardens, located on Levels 10 and 17. As shown in Figure 8 and Figure 9 on pages 20 and 21, the Project also incorporates two sky gardens into the building's design that serve as an extension of the indoor office areas. The landscaping on these levels would extend to the outer edge of the building, creating a linear ring that creates visual interest from other parts of the building. These outdoor spaces would include seating areas and viewing terraces. As shown in and Figure 10 on page 22, the Project would also provide a fully enclosed roof-level sky dome, which would serve as an observation area that allows visitors to view the City from the sky level. The sky dome would provide several landscaped areas and planters, seating areas, as well as water features.

The Project would also enhance the public realm through streetscape improvements. Specifically, the Project would improve the pedestrian experience along Sunset Boulevard and Harold Way by providing new street trees and continuous planted parkways. In addition, due to its sloped roof, when viewed from Sunset Boulevard, the podium would appear as one-story in height and would also feature stepped terraced planters that connect the top of the podium to the ground level, thereby creating a more pedestrian-friendly scale. The expansive glass wall of the main lobby within the podium together with the proposed setback and landscaping would create a plaza-like pedestrian experience along Sunset Boulevard. Furthermore, due to the increased height of existing grade along Harold Way, the first floor of the podium along Harold Way would be semi-subterranean, and the third level of the podium would be stepped back from Harold Way. As such, the overall height of the podium façade along Harold Way would appear as one and a half levels, promoting a human-friendly scale. In addition, the façade wall along Harold Way would feature an undulating organic and natural design that creates visual interest through its curvature.

The Project would remove the existing 14 on-site trees and 10 street trees, none of which are protected trees under the City's Protected Tree and Shrubs Ordinance No. 186,873. The Project would replace the on-site trees with approximately 60 new trees including 25 percent native tree species such as *Platanus racemosa*, *Cercis occidentalis*, and *Cercidium floridum*. In addition, the existing street trees would be replaced with 19 new street trees including 13 Chinese Elm Trees which would provide shade, and six California Fan Palms to match the existing and iconic palm trees along Sunset Boulevard.

3.3.5 Access, Circulation, and Parking

Vehicular access to the Project Site would be provided from the Project's Sunset Boulevard frontage. Ingress is provided via a one-way driveway ramp along Sunset Boulevard located in the southeast corner of the Project Site, and egress is provided from a separate driveway on the southwestern corner of the Project Site. The Project does not include any ingress or egress access along the

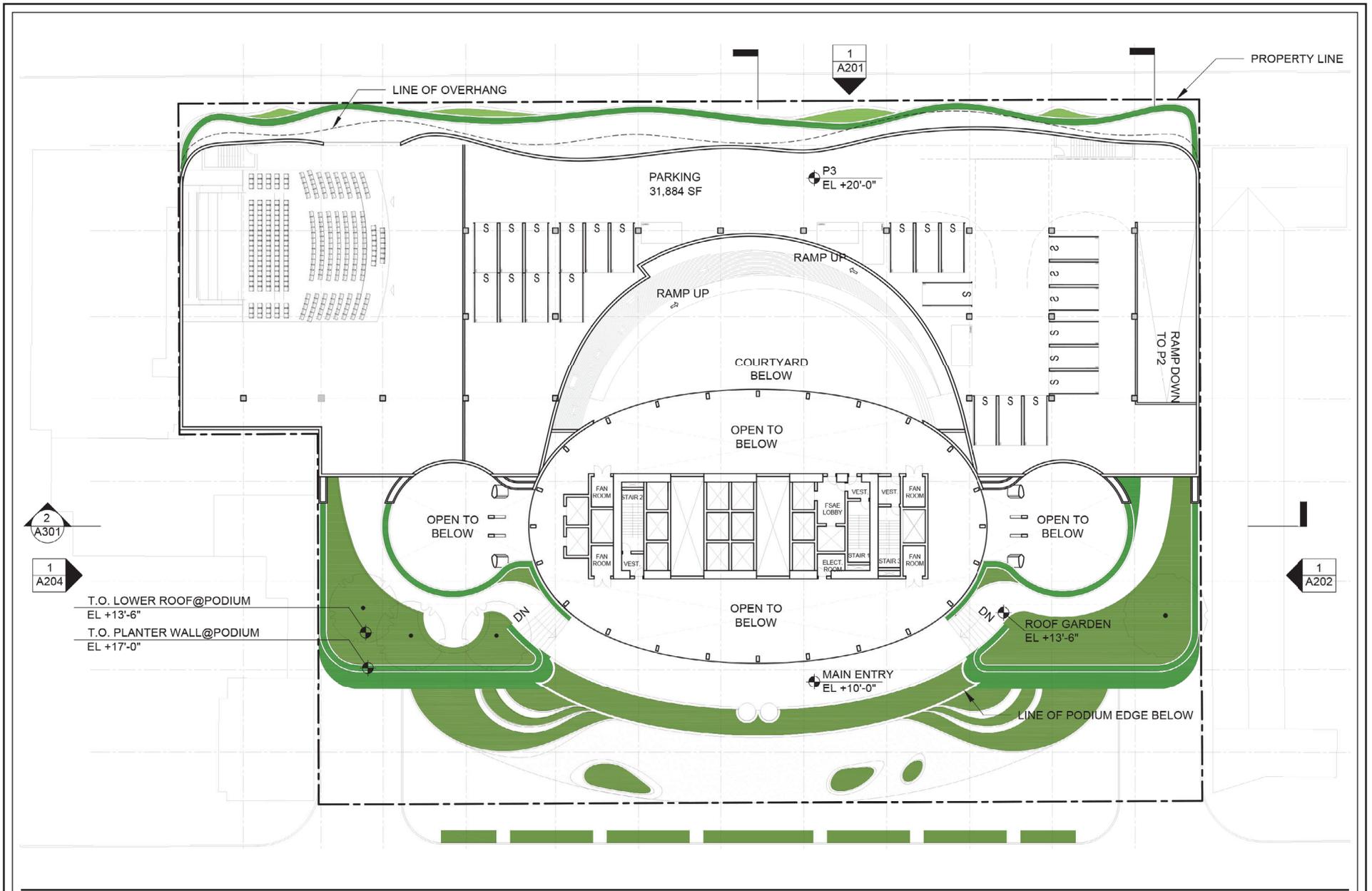


Figure 7
Upper Level Podium Plan

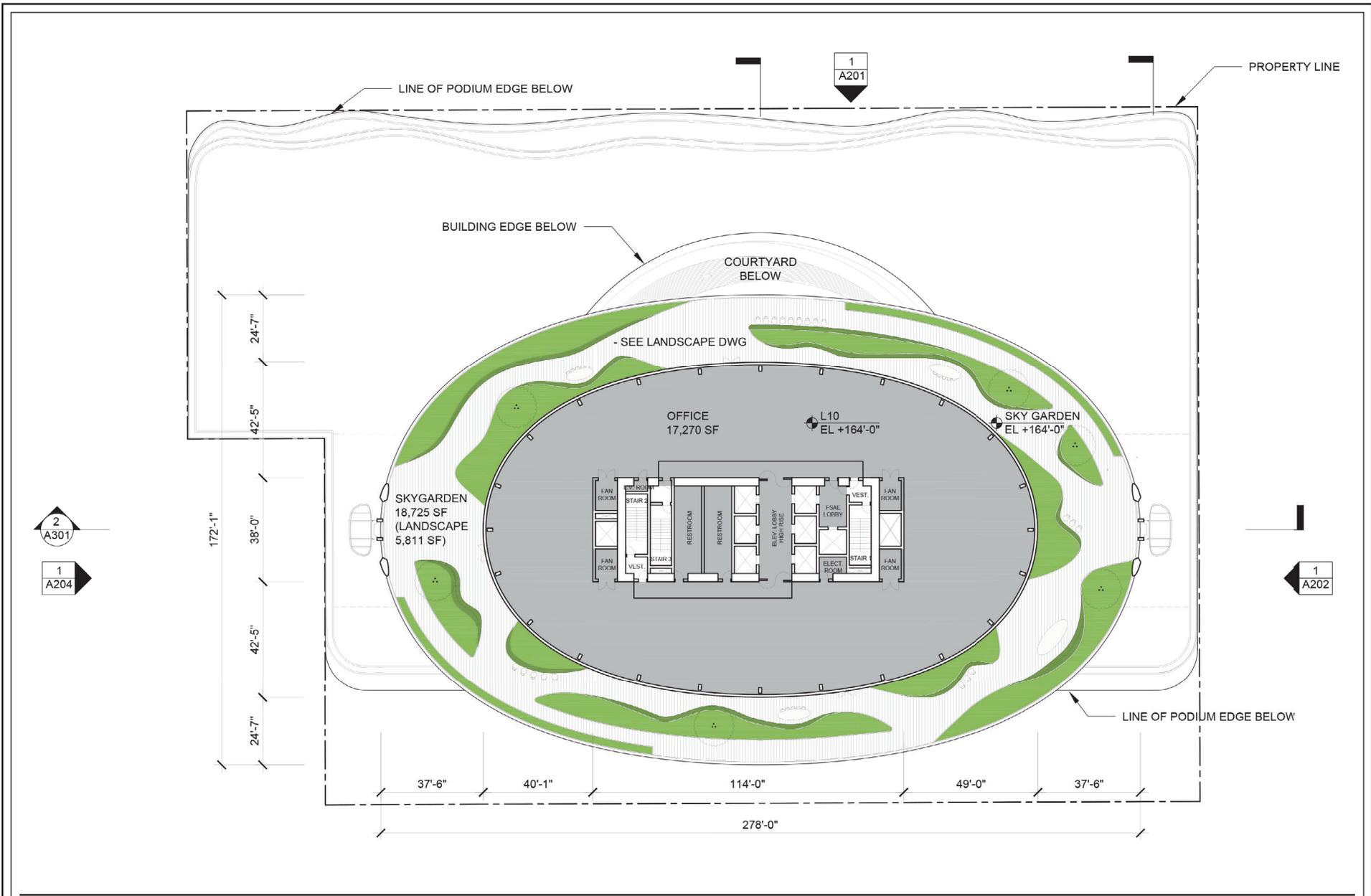


Figure 8
Sky Garden—Level 10

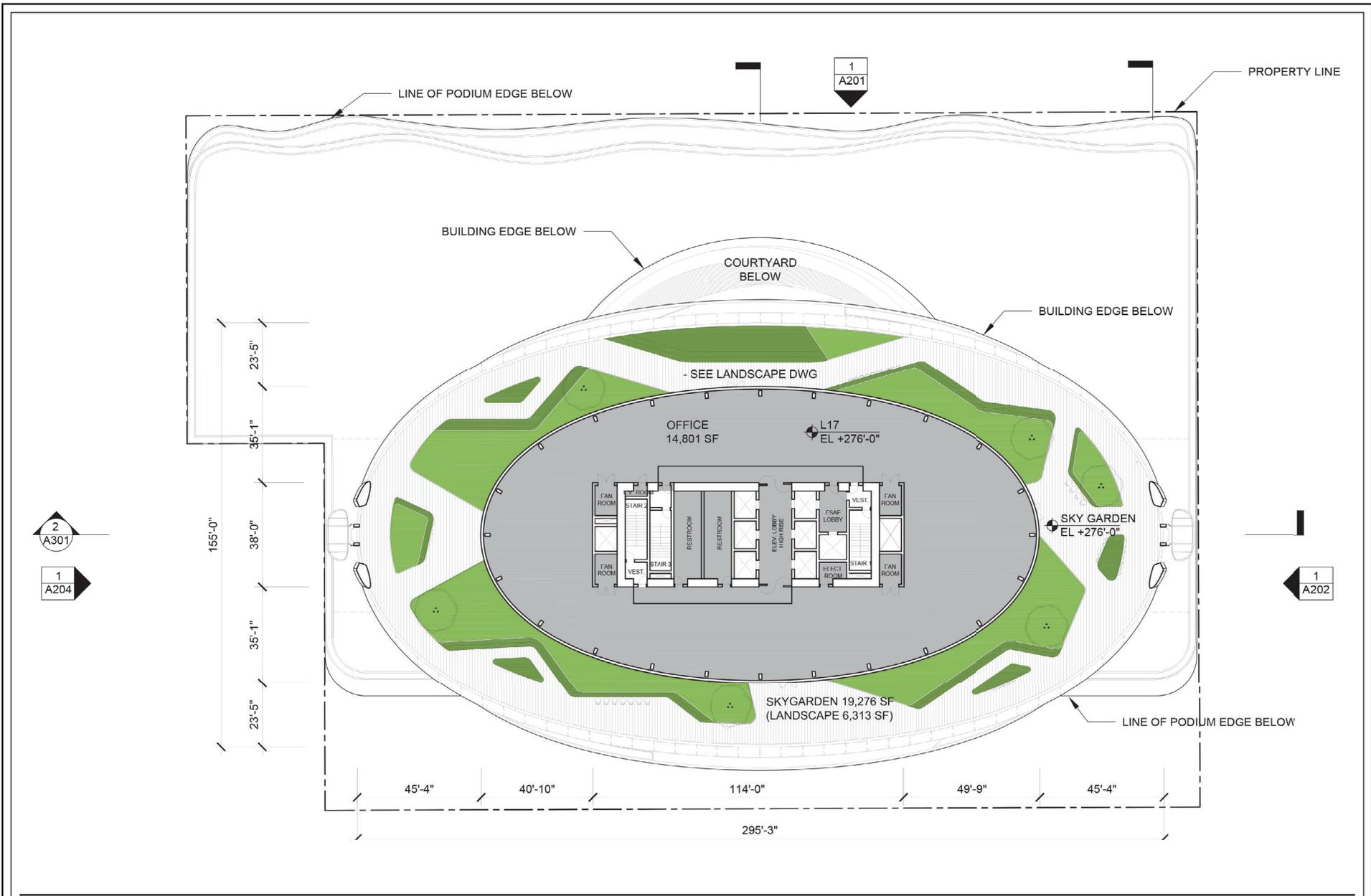
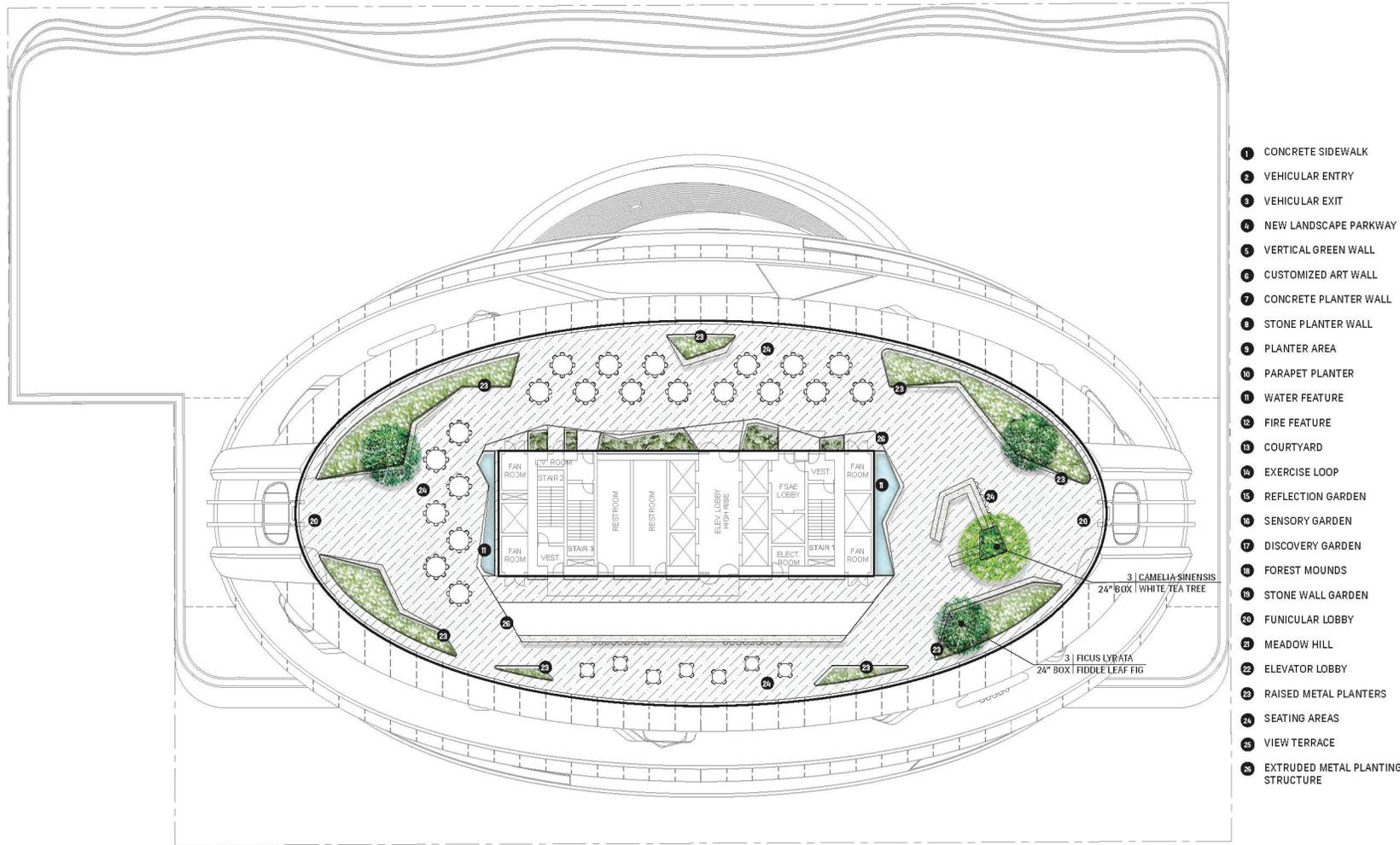


Figure 9
Sky Garden—Level 17



- 1 CONCRETE SIDEWALK
- 2 VEHICULAR ENTRY
- 3 VEHICULAR EXIT
- 4 NEW LANDSCAPE PARKWAY
- 5 VERTICAL GREEN WALL
- 6 CUSTOMIZED ART WALL
- 7 CONCRETE PLANTER WALL
- 8 STONE PLANTER WALL
- 9 PLANTER AREA
- 10 PARAPET PLANTER
- 11 WATER FEATURE
- 12 FIRE FEATURE
- 13 COURTYARD
- 14 EXERCISE LOOP
- 15 REFLECTION GARDEN
- 16 SENSORY GARDEN
- 17 DISCOVERY GARDEN
- 18 FOREST MOUNDS
- 19 STONE WALL GARDEN
- 20 FUNICULAR LOBBY
- 21 MEADOW HILL
- 22 ELEVATOR LOBBY
- 23 RAISED METAL PLANTERS
- 24 SEATING AREAS
- 25 VIEW TERRACE
- 26 EXTRUDED METAL PLANTING STRUCTURE

Figure 10
Rooftop Garden

Project Site's Harold Way frontage. The vast majority of the Project's vehicular parking would be provided below grade, in a six-level subterranean garage. Three partial levels of fully enclosed parking would also be integrated into the podium.

Primary pedestrian access to the Project Site would be provided via a sloped walkway along the Sunset Boulevard frontage and expansive landscaped open space areas and pedestrian paths would be provided on the upper roof level of the podium. In addition, as described above, a funicular would take visitors from the ground level all the way up to the building's sky dome level. Access for trash pickup and other freight vehicles would be provided via the proposed Sunset Boulevard curbcut/loading dock entry along the western portion of the Project Site.

As illustrated in Table 2 on page 24, based on the proposed commercial uses, the Project would be required to provide 1,060 vehicle parking spaces. The Project would provide 1,287 vehicle parking spaces, exceeding the requirements of the LAMC. Additionally, the Project would include 59 short-term and 108 long-term bicycle parking spaces in accordance with LAMC Section 12.21-A.16(a)(2). Further, pursuant to Ordinance No. 186,485, 30 percent of the Project's parking spaces will be designated as Electric Vehicle (EV) spaces capable of supporting future electric vehicle supply equipment (EVSE) and 10 percent of the spaces will be equipped with EV Charging Stations.

3.3.6 Lighting and Signage

The Project would include low-level exterior lights along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage would be incorporated. All lighting would comply with current energy standards and regulations, as well as design requirements. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light spill-over from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. All exterior and interior lighting would meet high energy efficiency requirements utilizing light-emitting diode (LED) or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations.

Proposed signage would be designed to be aesthetically compatible with the proposed architecture of the Project and its surroundings. Proposed signage would include identity signage, building and tenant identification signage, and general ground level and way-finding pedestrian signage that would comply with LAMC and HSSUD signage regulations. The HSSUD regulations allow a maximum permitted sign area of two square feet for each 1 foot of linear street frontage, which would allow the Project to include up to 640 square feet of signage along Sunset Boulevard. The Project would not include signage with flashing or mechanical properties. Project signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

3.3.7 Site Security

The Project would include numerous security features, which may include a closed-circuit camera system and keycard entry for the office uses. Additionally, a security check-in point located off the sidewalk along Sunset Boulevard would be provided for main pedestrian access to the Project Site.

**Table 2
Summary of Proposed Parking**

Land Use	Quantity	Parking Ratio	Parking
Vehicle Parking^a			
Office	489,863 sf ^c	2 sp per 1,000 sf	960 vehicle sp
Restaurant	19,915 sf	2 sp per 1,000 sf	40 vehicle sp
Screening Room	14,256 sf (300 seats)	1 sp per 5 seats	60 vehicle sp
<i>Total Vehicle Parking Required</i>			<i>1,060 vehicle sp</i>
<i>Total Vehicle Parking Proposed</i>			<i>1,287 vehicle sp</i>
Bicycle Parking^b			
Office ^c	489,863 sf		
Short-Term	—	1 sp per 10,000 sf	49 bicycle sp
Long-Term	—	1 sp per 5,000 sf	98 bicycle sp
Restaurant	19,915 sf		
Short-Term	—	1 sp per 2,000 sf	10 bicycle sp
Long-Term	—	1 sp per 2,000 sf	10 bicycle sp
<i>Total Bicycle Parking Required</i>			<i>167 bicycle sp</i>
<i>Total Bicycle Parking Proposed</i>			<i>167 bicycle sp</i>
<p><i>sf = square feet</i> <i>sp = spaces</i> <i>— = Not applicable</i> ^a Per LAMC Section 12.21-A.4(x). ^b Per LAMC Section 12.21-A.16(a)(2). ^c Includes 38,001 square feet of sky gardens located on levels 10 and 17 of the building. Source: Eyestone Environmental, 2022.</p>			

The Project would also be designed such that entrances to and exits from the building, open spaces around the building, and pedestrian walkways would be open and in view of surrounding sites. The main lobby along Sunset Boulevard would feature a completely transparent glass enclosure, thereby providing additional lighting and security to the open space and walkways. In addition, the building and walkways would be properly lit in order to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building. Parking areas would also be sufficiently lit to maximize visibility and reduce areas of concealment.

3.3.8 Special Events

The Project's roof-level would include a restaurant and event space that may be used for hosting special events. The total occupancy for the Level 22 restaurant and event space would be approximately 660 persons. Events would typically be restricted to daytime and evening hours.

3.3.9 Sustainability Features

The Project would be designed to meet the standards for United States Green Building Council Leadership in Energy and Environmental Design (LEED) Certification and to meet the most recent WELL Building Standards. The Project also intends to obtain certification as an Environmental Leadership Development Project (ELDP) under the Jobs and Economic Improvement Through Environmental Leadership Act. (PRC, Section 21178, et seq.)

The Project would support environmental sustainability by incorporating sustainable building features and construction protocols required by the Los Angeles Green Building Code (LAMC Chapter IX, Article 9), the California Green Building Standards Code (California Code of Regulations, Title 24, Part 11; referred to as the CALGreen Code), and the California Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6; California Energy Code). The Project also represents an infill development in close proximity to existing transit lines and walkable streets, and would utilize existing infrastructure to service the proposed uses. Sustainability features would include, but are not limited to, water conservation features that include the use of native plants, passive cooling strategies, a bicycle-friendly site design, and waste reduction features. Additionally, the Project would implement a capture and use cistern system within the basement level of the proposed building to capture stormwater runoff and hold it for subsurface irrigation in accordance with the City's Low Impact Development (LID) requirements.

In addition, the Project Site's proximity to the Metro B (Red) Line Hollywood/Vine Station, as well as the abundance of bus lines within 0.25 mile, would encourage and support the use of public transportation and a reduction in vehicle miles traveled by Project employees and visitors.

In addition, as discussed above, 30 percent of the Project's parking spaces will be designated as EV spaces capable of supporting future EVSE and 10 percent of the spaces will be EV Charging Stations as required by Ordinance No. 186,485.

3.3.10 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 levels. The building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to commence in 2024 and be completed in 2027. It is estimated that approximately 264,800 cubic yards of export would be hauled from the Project Site.

3.4 REQUESTED PERMITS AND APPROVALS

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

- Pursuant to LAMC Section 11.5.6, a General Plan Amendment to amend the land use designations from Highway Oriented Commercial and High Medium Residential to Regional Center Commercial;
- Pursuant to LAMC Section 12.32-F, 12.32-H, 12.32-Q, a Vesting Zone Change and Height District Change to change the Project Site's zoning designation from C4-1-SN and [Q]R4-1VL to C2-2-SN;
- Pursuant to LAMC Sections 12.24-W.1 a Main Conditional Use Permit (CUP) to permit the sale and dispensing of a full-line of alcoholic beverages for three on-site venues including a restaurant/event space and screening room;
- Pursuant to LAMC Section 12.24-W.18, a Conditional Use Permit to allow patron dancing in conjunction with live entertainment for a roof top restaurant/event space.
- Pursuant to LAMC Section 16.05, Site Plan Review approval for development of a project which creates 50,000 gross square feet or more of nonresidential floor area;
- Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map to merge existing lots, resubdivide the Property into one (1) ground lot and fourteen (14) air-space lots, and waive a 10-foot dedication requirement along Harold Way;
- Pursuant to LAMC Section 11.5.7, Project Permit Compliance approval for signage as required under Ordinance No. 181,340 (Hollywood Signage Supplemental Use District);

Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, tree removal permits, haul route permit, grading permits, excavation permits, foundation permits, building permits, and sign permits.

3.5 RESPONSIBLE & TRUSTEE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (State CEQA Guidelines Section 15381). The list below identifies whether any responsible agencies have been identified for the Project.

No responsible public agencies have been identified for this Project.

A Trustee Agency under CEQA is a public agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State.

No trustee agencies have been identified for this Project.

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) §21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” PRC Section 21099 defines a “transit priority area” as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan.” 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.”⁹

PRC Section 21099 applies to the Project since the Project qualifies as an employment center project located within 0.5 mile of a major transit stop. Therefore, the Project is exempt from aesthetic impacts. The aesthetic analysis in this Initial Study is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment. The aesthetic impact analysis in this Initial Study is included to discuss what aesthetic impacts would 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 provided below shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

⁹ City of Los Angeles Department of City Planning, Zoning Information File ZI No. 2452, TPAs/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA.

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

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

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

Less Than Significant Impact. A scenic vista is a panoramic view of a valued visual resource.¹⁰ Panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are typically associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies. Focal views are also relevant when considering this question from Appendix G of the CEQA Guidelines. Examples of focal views include natural landforms, public art/signs, historic buildings, and important trees.

With regard to panoramic views, valued visual resources in the vicinity of the Project Site include the Hollywood Hills and the Hollywood Sign, a 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 historical resources such as the Courtyard Apartments located more than a block to the north of the Project Site along La Baig Avenue, CBS Columbia Square Studios west of Gower Street, and structures within the Selma–La Baig Historic District (Historic District) to the north across Harold Way, including the three existing bungalows located on the Project Site. Within the immediate vicinity of the Project Site, public views of the Hollywood Hills and the Hollywood Sign are available along Gower Street and public views of the Hollywood Hills are intermittently available along La Baig Avenue. From Sunset Boulevard and Harold Way, public views of the Hollywood Hills and Hollywood Sign are

¹⁰ City of Los Angeles, 2006 L.A. CEQA Thresholds Guide, p. A.2-1

generally blocked by existing buildings along these east/west streets. Further, the Project does not propose any new development along Gower Street or La Baig Avenue. Therefore, existing views of the Hollywood Hills and Hollywood Sign along these streets would remain.

With regard to focal views of nearby historic resources, the Project vicinity is currently developed. The Project would remove three bungalows that are contributors to the Selma–La Baig Historic District. However, the majority of the Selma–La Baig Historic District is located to the north of the Project Site and views of the District would be retained.

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

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

No Impact. The Project Site is not located along a state scenic highway. The nearest officially eligible state scenic highway is along the Foothill Freeway (I-210), approximately 10 miles northeast of the Project Site.¹¹ Therefore, the Project would not substantially damage scenic resources within a state scenic highway as no scenic highways are located adjacent to or near the Project Site. Moreover, pursuant to SB 743 and ZI No. 2452, the Project’s aesthetics impact would not be considered a significant impact on the environment. Therefore, no impacts to scenic resources would occur, and no further evaluation of this topic in the EIR is required.

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

Less Than Significant Impact. 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 of this Initial Study, the northern portion of the Project Site (referred to as the Harold Parcels) is designated as High Medium Residential by the Hollywood Community Plan and is zoned R4-1VL (Multiple Dwelling zone, Height District 1VL). Pursuant to the LAMC, the R4 zone permits multi-family residential development, single family dwellings, apartment houses, parks, childcare facilities, churches and schools. The Height District 1VL zoning designation permits a FAR of 3:1 and a height limit of 45 feet or three stories.

¹¹ California Department of Transportation, Scenic Highways, <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>, accessed January 12, 2022.

The southern portion of the Project Site (referred to as the Sunset Parcels) is designated as Highway Oriented Commercial by the Community Plan and is zoned C4-1-SN (Commercial zone, Height District 1, Sign District). The C4 zone permits a wide range of commercial uses, including office, retail, restaurant, and hotel uses, as well as any land use permitted in the R4 zone. The “1” indicates that the Project Site is located in Height District 1, which in conjunction with the C4 Zone, allows unlimited building height but limits the FAR to 1.5:1. The SN designation indicates that Sunset Parcels are located within the Hollywood Signage Supplemental Use District (HSSUD), which establishes allowable sign regulations.

As discussed in detail in Section 3, Project Description, of this Initial Study, the Project would provide approximately 489,863 square feet of office uses,¹² 19,915 square feet of restaurant/event space, and a 14,256-square-foot screening room, resulting in a total floor area of 524,034 square feet and a FAR of approximately 6:1 upon completion of the Project. The proposed uses would be located within a 22-story building (maximum height of 420 feet) that would be integrated with a three-level podium, and subterranean parking below. As described in detail in Section 3, Project Description, several discretionary approvals are being sought to implement the Project. These include a General Plan Amendment to change the land use designation of the Project Site to Regional Center Commercial and a Vesting Zone and Height District Change to change the Project Site’s zoning designation to C2-2-SN. With approval of these discretionary actions, the Project would be consistent with applicable zoning regulations regarding scenic quality including those related to height and FAR.

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

Citywide General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element) provides direction regarding the City’s vision for future development 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).¹³ The Project Site is located in a highly urbanized area that is generally developed with a mix of commercial and residential uses. The Project is intended to promote revitalization of Hollywood by transforming the Project Site from a mix of varied and outdated buildings and underutilized surface parking areas into an architectural icon integrated with expansive plazas and pedestrian pathways that connect to adjacent streets. The new building would be comprised of 22 levels integrated with a three-level podium, and six subterranean parking levels below. The building’s roof level would be designed as a fully enclosed and transparent sky dome that is programmed to include a restaurant and event space for hosting special events. The façade materials include colored pixelated glass that

¹² Includes 38,001 square feet of sky gardens.

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

create a jewel-like pattern of geometric shapes that changes from the base of the building up through the sky dome. The design of the building breaks down the overall massing by setting back each floor plate. In addition, two sky gardens that include covered outdoor hardscaped areas and landscaped areas would be located on Levels 10 and 17 and would create visual interest.

In addition, due to its sloped roof, when viewed from Sunset Boulevard, the podium would appear as one-story in height and would also feature stepped terraced planters that connect the top of the podium to the ground level, thereby creating a more pedestrian-friendly scale. The expansive glass wall of the main lobby within the podium together with the sizeable setback and landscaping would create a plaza-like pedestrian experience along Sunset Boulevard. Furthermore, due to the increased height of existing grade along Harold Way, the first floor of the podium along Harold Way would be semi-subterranean, and the third level of the podium would be stepped back from Harold Way. As such, the overall height of the façade along Harold Way would appear as one and a half levels, promoting a human-friendly scale. In addition, the façade wall along Harold Way would also feature an undulating design with art and greenery that creates visual interest.

The Project would also enhance the public realm through streetscape improvements. Specifically, the Project would improve the pedestrian experience along Sunset Boulevard and Harold Way by providing new street trees and continuous planted parkways. The existing 14 on-site trees and 10 street trees, none of which are protected trees under the City's Protected Tree and Shrubs Ordinance No. 186,873, would be replaced with 60 on-site trees and 19 new street trees including 13 Chinese Elm trees which would provide shade, and six California Fan Palms to match the existing and iconic palm trees along Sunset Boulevard. In addition, proposed signage would comply with LAMC and HSSUD signage regulations and would be designed to be aesthetically compatible with the proposed architecture of the Project and its surroundings.

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

Hollywood Community Plan

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

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

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

Hollywood Redevelopment Plan

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

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

As previously discussed above, the Project would enhance the built environment in the surrounding neighborhood and upgrade the quality of development. Specifically, the Project would transform a mix of varied and outdated buildings and underutilized surface parking areas into an architectural icon integrated with expansive plazas and pedestrian pathways that connect to adjacent streets. As discussed above, the new building would be comprised of 22 levels integrated with three podium levels, and six subterranean parking levels below. The façade materials include colored pixelated glass that create a jewel-like pattern of geometric shapes that changes from the base of the building up through the sky dome. Lush landscaping and open spaces are provided from the building's podium base up to the transparent rooftop dome. The design of the building also breaks down the overall massing by setting back each floor plate and two sky gardens are proposed to create visual interest. In addition, as previously described, the majority of the Project's parking would be provided within a six-level subterranean parking garage below the podium as well as within three partial levels of fully enclosed above-grade parking located within the podium. Parking areas would also be lit to maximize visibility and reduce areas of concealments. Further, proposed signage would comply with LAMC and HSSUD signage regulations and would be designed to be aesthetically compatible with the proposed architecture of the Project and its surroundings. Overall, the Project would support and not conflict with the Redevelopment Plan's goal to improve the quality of the environment and provide a safe environment.

Citywide Urban Design Guidelines

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

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

The Project would enhance the streetscape adjacent to the Project Site through streetscape improvements. Specifically, the Project would improve the pedestrian experience along Sunset Boulevard and Harold Way by providing new street trees and continuous planted parkways. In addition, due to its sloped roof, when viewed from Sunset Boulevard, the podium would appear as one-story in height and would also feature stepped terraced planters that connect the top of the podium to the ground level, thereby creating a more pedestrian-friendly scale. Level P1's expansive glass wall together with the sizeable setback and landscaping would create a plaza-like pedestrian experience along Sunset Boulevard. Furthermore, the third level of the podium would be stepped

back from Harold Way and due to the increased height of existing grade along Harold Way, the first floor of the podium along Harold Way would be semi-subterranean. As such, the overall height of the façade along Harold Way would appear as one and a half levels, promoting a human-friendly scale. In addition, the façade wall along Harold Way would also feature an undulating design with greenery and art that creates visual interest. The Project would also include low-level exterior lights adjacent to the building and along pathways that would serve to enhance the safety of pedestrians at night. Overall, these Project elements would promote a safe, comfortable, and accessible pedestrian experience for all.

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

Vehicular access to the Project Site would be provided from the Project's Sunset Boulevard frontage. Ingress is provided via a one-way driveway ramp along Sunset Boulevard located in the southeast corner of the Project Site, and egress is provided from a separate driveway on the southwestern corner of the Project Site. The vast majority of the Project's vehicular parking will be provided below grade, in a six-level subterranean garage. Three partial levels of fully enclosed parking would also be integrated into the podium. The proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and would incorporate pedestrian warning systems, as appropriate. The pedestrian access along Sunset Boulevard would be separated from vehicular access and drop off to avoid any conflicts. Along Harold Way, the Project proposes to provide various streetscape improvements, such as a continuous planted parkway, street trees, and exterior lighting. Additionally, the above-grade parking levels within the podium facing Harold Way would be fully enclosed, stepped back, and screened with greenery and art, further activating the streetscape and improving the pedestrian experience. Thus, the Project would support this Guideline.

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

As discussed above, the Project proposes to provide various streetscape improvements, such as street trees, a continuous planted parkway, and exterior lighting. In addition, as described above, due to its sloped roof, when viewed from Sunset Boulevard, the podium would appear as one-story in height and would also feature stepped terraced planters that connect the top of the podium to the ground level, thereby creating a more pedestrian-friendly scale. Level P1's expansive glass wall together with the sizeable setback and landscaping would create a plaza-like pedestrian experience along Sunset Boulevard. Furthermore, the third level of the podium would be stepped back from Harold Way and due to the increased height of existing grade along Harold Way, the first floor of the podium along Harold Way would be semi-subterranean. As such, the overall height of the podium façade along Harold Way would appear as one and a half levels, promoting a human-friendly scale. In addition, the façade wall along Harold Way would also feature an undulating design with greenery and art that creates visual interest. Overall, the Project would be designed to actively engage with streets and public space and maintain human scale.

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

The Project Site is within the Hollywood Entertainment District Neighborhood of the Hollywood Community Plan area. The area surrounding the Project Site is developed primarily with a mix of

commercial and residential uses. Properties to the north along Harold Way are developed with bungalows that include residential and hotel uses, and the IO Music Academy Production School, and are zoned [Q]R4-1VL. To the south of the Project Site across Sunset Boulevard are the Sunset Gower Studios, which are zoned M1-1. To the east of the Project Site are the Hollywood Palms Inn and Suites, which are zoned [Q]R4-1VL and C4-1-SN. Properties to the west of the Project Site are developed with commercial uses including a liquor store, restaurants/cafes, and office uses and are zoned C4-1 and C4-1-SN. Other nearby uses include Emerson College Los Angeles to the southeast along Sunset Boulevard, and the Columbia Square development, which includes a 23-story tower located to the west along Sunset Boulevard. As discussed in Section 3, Project Description, of this Initial Study, the Project is intended to promote revitalization of Hollywood by transforming the Project Site from a mix of varied and outdated buildings and underutilized surface parking areas into an architectural icon integrated with expansive plazas and pedestrian pathways that connect to adjacent streets as well as to complement the varying surrounding uses. The Project's scale and density would be consistent with development patterns and projected growth in the surrounding area. Due to its sloped roof, when viewed from Sunset Boulevard, the podium would appear as one-story in height and would also feature stepped terraced planters that connect the top of the podium to the ground level. Furthermore, due to the increased height of existing grade along Harold Way, the first floor of the podium along Harold Way would be semi-subterranean, and the third level of the podium would be stepped back from Harold Way. As such, the overall height of the podium façade along Harold Way would appear as one and a half levels. The building's massing would be pushed closer to Sunset Boulevard to respect the existing urban context of the street. Additionally, the Project would include many design elements that would be a welcome contribution to the neighborhood's vibrant commercial energy, such as extruded metal mesh walls with gradient color, terrazzo pavers on the sky garden levels, glass walls, and colored pixelated glass. Thus, the Project would support this Guideline.

Guideline 5: Express a clear and coherent architectural idea

As discussed above, the Project is intended to promote revitalization of Hollywood by transforming the Project Site from a mix of varied and outdated buildings and underutilized surface parking areas into an architectural icon integrated with expansive plazas and pedestrian pathways that connect to adjacent streets. The new building would be comprised of 22 levels integrated with a three-level podium, and six subterranean parking levels below. The building's roof level would be designed as a fully enclosed and transparent sky dome that is programmed to include a restaurant and event space for hosting special events. The sky dome would include a transparent façade to maximize City views. Below the rooftop level would be 21 floors devoted to office and related uses. The design of the building breaks down the overall massing by setting back each floor plate and also allows for flexible and adaptable office space layouts. In addition, two sky gardens located on Levels 10 and 17, connect the indoor office environment with the outdoor environment. The building's podium at the base would consist of three floors. Level P1, which would be partially below grade, would provide an arrival and drop-off point on Sunset Boulevard, as well as access to the building's below grade and podium parking levels. The Project's lobby would be located on Level P2, the second floor of the podium base. Level P3 would provide a green roof that slopes down to the Project entrance on Sunset Boulevard. The P3 green roof area would include a courtyard, lawn areas, a water feature, exercise loop, and garden areas. The podium level also includes two lobbies for the funicular that would travel along a rail located on the outer edge of the building. As previously described, the majority of the Project's parking would be provided within a six-level subterranean parking garage below the podium as well as within three partial levels of fully enclosed above-grade parking located

within the podium. The Project's landscape program includes lush landscaping and open spaces from the building's podium base, all the way through the building's core, and up to the transparent rooftop dome. With respect to the building materials, the façade materials (i.e., colored pixelated glass) would create jewel-like geometric tessellation. The distinct vertical gradient on each floor would change from the base of the building up through the sky dome. Additionally, proper lighting of the building 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 building. Proposed signage would comply with LAMC and HSSUD signage regulations and would be designed to be aesthetically compatible with the proposed architecture of the Project and its surroundings.

Relative to the surrounding development, the Project design would complement the varying design elements of the uses adjacent to the Project Site. The overall design of the Project would create an architectural icon integrated with expansive plazas and pedestrian pathways that connect to adjacent streets, creating a coherent architectural idea.

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

The Project includes numerous amenities that support community building and provide a comfortable user experience. The upper green roof area (Level 3 of the podium) would include a courtyard, lawn areas, a water feature, exercise loop, and garden areas. The podium level also includes two lobbies for a funicular that would travel along a rail located on the outer edge of the building and would take visitors from the ground level all the way up to the building's sky dome level that includes a restaurant and event space. As discussed above, the Project also proposes to provide various streetscape improvements, such as new street trees, continuous planted parkways, and exterior lighting. In addition, as described above, Level P1's expansive glass wall together with the sizeable setback and landscaping would create a plaza-like pedestrian experience along Sunset Boulevard. Furthermore, the third level of the podium would be stepped back from Harold Way and due to the increased height of existing grade along Harold Way, the first floor of the podium along Harold Way would be semi-subterranean. As such, the overall height of the podium façade along Harold Way would appear as one and a half levels, promoting a human-friendly scale. In addition, the façade wall along Harold Way would also feature an undulating design that creates visual interest. The Project would also include low-level exterior lights adjacent to the building and along pathways that would serve to enhance the safety of pedestrians at night.

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

As discussed in Section 3, Project Description, of this Initial Study, the block that contains the Project Site is bounded by Harold Way to the north, Sunset Boulevard to the south, La Baig Avenue to the east and Gower Street to the west. Internal to the Project Site, pedestrian walkways would be provided along all driveways to minimize pedestrian-vehicular conflicts. The pedestrian access along Sunset Boulevard would be separated from vehicular access and drop off to avoid pedestrian/vehicular conflicts. Lastly, the Project would also include lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify a secure route between parking area and points of entry into the building. Thus, the Project would support this Guideline.

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

The Project Site is located in an urbanized area and is currently developed with commercial uses and associated surface parking areas. Existing landscaping within the Project Site includes 14 trees, including one Camphor, ten Chinese elms, and three Olive trees. In addition, there are 10 street trees within the public rights-of-way surrounding the Project Site. As discussed further below, none of the trees within the Project Site and in the adjacent public right-of-way are considered protected by the City. The Project would replace the on-site trees with at least 60 new trees including 25 percent native tree species such as *Platanus racemosa*, *Cercis occidentalis*, and *Cercidium floridum*. In addition, the existing street trees would be replaced with 19 new street trees including 13 Chinese Elm trees for shade, and six California Fan Palms to match the existing and iconic palm trees along Sunset Boulevard. Thus, the Project would support this Guideline.

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

As discussed in Section 3, Project Description, of this Initial Study, the Project would be designed to meet the standards for United States Green Building Council Leadership in Energy and Environmental Design (LEED) Certification and to meet the most recent WELL Building Standards. The Project also intends to obtain certification as an ELDP under the Jobs and Economic Improvement Through Environmental Leadership Act. (PRC, Section 21178, et seq.)

The Project would also support environmental sustainability by incorporating sustainable building features and construction protocols required by the Los Angeles Green Building Code (LAMC Chapter IX, Article 9), the California Green Building Standards Code (California Code of Regulations, Title 24, Part 11; referred to as the CALGreen Code), and the California Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6; California Energy Code). The Project would also include sustainability features such as, water conservation features that include the use of native plants, passive cooling strategies, a pedestrian- and bicycle-friendly site design, and waste reduction features. The Project is also anticipated to implement a capture and use cistern system within the basement level of the proposed building to capture stormwater runoff and hold it for subsurface irrigation in accordance with the City's Low Impact Development (LID) requirements, set forth in Ordinance No. 181,899. In the event a capture and use system is not implemented, biofiltration planters would be used in accordance with LID requirements. In addition, 30 percent of the Project's parking spaces would be designated as EV spaces capable of supporting future EVSE and 10 percent of the spaces will be EV Charging Stations as required by Ordinance No. 186,485. Thus, the Project would support this Guideline.

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

As discussed in more detail below (see Checklist Section X, Hydrology and Water Quality) the Project is anticipated to implement a capture and use cistern system to capture stormwater runoff and hold it for subsurface irrigation at a later time in accordance with the LID Ordinance. In the event a capture and use system is not implemented, biofiltration planters would be used in accordance with LID requirements. Thus, the Project would support this Guideline.

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

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

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

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

Construction

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

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

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

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

Operation

The Project would include low-level exterior lights along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage would be incorporated. All lighting would comply with current energy standards and regulations, as well as design requirements. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light spillover from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. All exterior and interior lighting would meet high energy efficiency requirements utilizing light-emitting diode (LED) or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations. In addition, all lighting would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

Proposed signage would be designed to be aesthetically compatible with the proposed architecture of the Project and its surroundings. Proposed signage would include identity signage, building and tenant identification signage, and general ground level and way-finding pedestrian signage that would comply with LAMC and HSSUD signage regulations. The HSSUD regulations allow a maximum permitted sign area of two square feet for each 1 foot of linear street frontage, which would allow the Project to include up to 640 square feet of signage along Sunset Boulevard. The Project would not include signage with flashing or mechanical properties. Project signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

Daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. In general, sun reflection that has the greatest potential to interfere with driving occurs from the lower stories of a structure. Sun reflection from the Project would occur during periods in which the sun is low on the horizon and when the point of reflection within the Project Site is in front of the driver, in the direction of travel. The Project would feature a variety of surface materials, including glass, Ethylene

tetrafluoroethylene, concrete, and metal. As part of the Project, glass used in building façades would include high-performance coatings and the building shape would be designed to minimize glare from reflected sunlight.

Nighttime glare could result primarily from on-site illumination and vehicle headlights. As described above, the Project’s illuminated signs would not exceed the prescribed LAMC lighting requirements. Furthermore, while headlights from vehicles entering and exiting the Project Site would be visible during the evening and nighttime hours, such lighting sources would be typical for the area. Additionally, the three partial levels of above-grade parking would be fully enclosed in the podium and therefore vehicle movements would be screened from view. Thus, nighttime glare would not result in a substantial adverse impact.

Based on the above, with adherence to regulatory requirements, lighting associated with Project operation would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Moreover, pursuant to SB 743 and ZI No. 2452, the Project’s aesthetic impacts would not be considered significant. No further evaluation of this topic in an EIR is required.

II. AGRICULTURE AND FOREST RESOURCES

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

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

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

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

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles. As discussed in Section 2, Project Description, of this Initial Study, the Project Site is currently developed with four commercial office structures, three bungalows, and a surface parking lot. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. Furthermore, the Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.^{15,16} As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no 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 C4-1-SN (Commercial, Height District 1, Sign District) and R4-1VL (Residential, Height District 1VL). The C2 zone permits a wide variety of land uses including commercial, office, residential, retail, and hotel uses, whereas the R4 zone permits one- and two-family dwellings, apartment houses, multiple dwellings, and commercial. The Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area.

¹⁵ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APN 5545-008-011, -012, -044, <http://zimas.lacity.org/>, accessed January 12, 2022.

¹⁶ California Department of Conservation, California Important Farmland Finder, <https://maps.conservation.ca.gov/DLRP/CIFF/App/index.html?marker=-118.29152006048791%2C34.02551004278704%2C%2C%2C%2C&markertemplate=%7B%22title%22%3A%22%22%2C%22longitude%22%3A-118.29152006048791%2C%22latitude%22%3A34.02551004278704%2C%22isIncludeShareUrl%22%3Atrue%7D&level=14>, accessed January 12, 2022.

Additionally, the Project Site and surrounding area are not enrolled under the California Land Conservation Act and are not subject to a Williamson Act Contract.¹⁷ Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no 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 four commercial office structures, three bungalows, and a surface parking lot. The Project Site does not include any forest land or timberland. In addition, as discussed above, the Project Site is not zoned for forest land and is not used as forest land.¹⁸ Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the PRC. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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

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

No Impact. As discussed above, the Project Site is located in an urbanized area of the City and does not include farmland or forest land. Furthermore, the Project Site and surrounding area are not mapped as farmland or forest land, are not zoned for farmland/agricultural use or forest land, and do not contain any agricultural or forest uses.¹⁹ As such, the Project would not result in the conversion of farmland to non-agricultural use or in the conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

¹⁷ California Department of Conservation, The Williamson Act Status Report 2016–17, August 2019.

¹⁸ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5545-008-011, -012, -044, <http://zimas.lacity.org/>, accessed January 12, 2022.

¹⁹ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5545-008-011, -012, -044, <http://zimas.lacity.org/>, accessed January 12, 2022.

III. AIR QUALITY

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

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

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

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (Basin). Within 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 lead²⁰). SCAQMD’s 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.²¹ With regard to future growth, SCAG has prepared their Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG’s planning area. Construction and operation of the Project may result in an increase in stationary and mobile source air emissions. As a result, development of the Project could have a

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

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

potential adverse effect on SCAQMD's implementation of the AQMP. Therefore, further evaluation of the Project's potential conflicts with the AQMP will be included in the EIR.

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

Potentially Significant Impact. As discussed above, construction and operation of the Project could result in the emission of air pollutants in the Basin, which is currently in non-attainment of federal air quality standards for ozone, 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}. As a result, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Basin. Therefore, further evaluation of the Project's potential cumulative air pollutant emissions will be included in the EIR.

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

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

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

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

Construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.²² In particular, Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the

²² SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/rules-compliance/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed January 12, 2022.

public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.²³

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

IV. BIOLOGICAL RESOURCES

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

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

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

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

No Impact. The Project Site is located in an urbanized area and is currently developed with four commercial structures, three bungalows, and a surface parking lot. No riparian or other sensitive natural community exists on the Project Site or in the surrounding area.^{27,28} Furthermore, the Project Site and surroundings are not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.^{29,30} In addition, there are no other sensitive natural communities identified by the CDFW or the USFWS.^{31,32} Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural

²⁴ California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, April 2021.

²⁵ United States Fish and Wildlife Service, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, <https://ecos.fws.gov/ecp0/reports/ad-hoc-species-report>, accessed January 12, 2022.

²⁶ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1C—Biological Resources Areas (Central Geographical Area), January 19, 1995, p. 2-18-5.

²⁷ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5545-008-011, -012, -044, <http://zimas.lacity.org/>, accessed January 12, 2022.

²⁸ United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed January 12, 2022.

²⁹ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1C—Biological Resources Areas (Central Geographical Area), January 19, 1995, p. 2-18-5.

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

³¹ California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), <https://apps.wildlife.ca.gov/bios/>, accessed January 12, 2022.

³² California Department of Fish and Wildlife, CDFW Lands, <https://apps.wildlife.ca.gov/lands/>, accessed January 12, 2022.

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

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

No Impact. As discussed above, the Project Site is located in an urbanized area and is currently developed with four commercial office structures, three bungalows, and a surface parking lot. No water bodies or state and federally protected wetlands exist on the Project Site.³³ As such, the Project would not have an adverse effect on state or federally protected wetlands. No impact would occur, and no 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 developed with four commercial office structures, three bungalows, and a surface parking lot. In addition, the areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within or surrounding the Project Site that provide linkages to natural open spaces areas which may serve as wildlife corridors. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.^{34,35}

According to the Tree Inventory Report prepared for the Project dated June 28, 2021, and included in Appendix IS-1 of this Initial Study,³⁶ there are 14 non-protected trees on the Project Site and 10 non-protected street trees that would be removed during construction of the Project. Although unlikely, these trees could potentially provide nesting sites for migratory birds. However, the Project would comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish and Game Code Section 3503 states that “[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.” No exceptions are provided in the code and CDFW has never promulgated any regulations interpreting these provisions.

³³ United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed January 12, 2022.

³⁴ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1C—Biological Resources Areas (Central Geographical Area), January 19, 1995, p. 2-18-5.

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

³⁶ Carlberg Associates, City of Los Angeles Tree Inventory Report—6061-6087 Sunset Boulevard, 6056-6090 Harold Way, Los Angeles, California 90028, June 28, 2021. See Appendix IS-1 of this IS.

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 CDFW.

With compliance with the Migratory Bird Treaty Act, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Impacts would be less than significant, and no 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 and Shrub Ordinance (Ordinance 186873, LAMC Chapter IV, Article 6) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, California Bay trees, Mexican Elderberry shrubs, and Toyon shrubs of at least 4 inches in diameter at breast height or 4.5 feet above the ground level at the base of the tree or shrub. These tree and shrub species are defined as “protected” by the City of Los Angeles. Trees or shrubs that have been planted as part of a tree planting program are exempt from the City’s Protected Tree and Shrub Ordinance and are not considered protected. The City’s Protected Tree and Shrub Ordinance prohibits, without a permit, the removal of any regulated protected tree, including “acts that inflict damage upon root system or other parts of the tree or shrub....” The protected tree or shrub must be replaced within the property by at least four specimens of a protected variety, except where the protected species is relocated pursuant to the LAMC. In addition, a protected tree shall only be replaced by other protected tree varieties and shall not be replaced by shrubs. A protected shrub shall only be replaced by other protected shrub varieties and shall not be replaced by trees, to the extent feasible as determined by the Advisory Agency, Board of Public Works, or a licensed or certified arborist.

According to the Tree Inventory Report prepared for the Project dated June 28, 2021, and included in Appendix IS-1 of this Initial Study,³⁷ existing landscaping within Project Site includes 14 trees, including one Camphor, ten Chinese elms, and three Olive trees. None of the 14 on-site trees are considered to be protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873. In addition, there are 10 street trees within the public rights-of-way surrounding the Project Site that are not species that are protected by the LAMC (e.g., Pink Trumpet trees and Mexican Fan palms). As indicated in the Tree Inventory Report, all of the existing on-site trees and

³⁷ Carlberg Associates, City of Los Angeles Tree Inventory Report—6061-6087 Sunset Boulevard, 6056-6090 Harold Way, Los Angeles, California 90028, June 28, 2021. See Appendix IS-1 of this IS.

10 street trees would be removed as part of the Project. All other trees would be avoided or preserved in place. On-site trees to be removed would be replaced at a 1:1 ratio, and street trees would be replaced on a 2:1 basis in accordance with the Bureau of Street Services, Urban Forestry Division's requirements. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As described above, the Project Site is located in an urbanized area and is currently developed with four commercial office structures, three bungalows, and a surface parking lot. As discussed above, landscaping within the Project Site is limited, consisting of one Camphor, ten Chinese elms, and three Olive trees. In addition, there are 10 street trees within the public rights-of-way that are comprised of Pink Trumpet trees and Mexican Fan palms. The Project Site does not support any designated habitat or natural community. No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.³⁸ Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

V. CULTURAL RESOURCES

	<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. 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Potentially Significant Impact. 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

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

California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to PRC Section 5020.1(k)); or (3) identified as significant in an historical resources survey (meeting the criteria in PRC Section 5024.1(g)). In addition, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register. The local register of historical resources is managed by the Los Angeles Office of Historic Resources, which operates SurveyLA, a comprehensive program to identify significant historical resources throughout the City.

As previously described, the Project Site is currently developed with four commercial office structures, three bungalows, and a surface parking lot. As discussed in Section 3, Project Description, of this Initial Study, the three bungalows have been included as contributors to the Selma-La Baig Historic District. Therefore, further evaluation of the Project's potential impacts on historical resources will be included in the EIR.

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

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

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

Less Than Significant Impact. The Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. Nevertheless, as the Project would require excavation at depths greater than those that have previously occurred on site, the potential exists to uncover existing but undiscovered human remains. If human remains are discovered during Project construction, work in the immediate vicinity of the construction area would be halted, and the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near

the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determines the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the most likely descendent. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. Therefore, due to the low potential that any human remains are located on the Project Site and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, the Project's impact related to human remains would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

VI. ENERGY

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

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

Potentially Significant Impact. The Project would generate an increased demand for electricity and natural gas services provided by the Los Angeles Department of Water and Power (LADWP) and the Southern California Gas Company, respectively, compared to existing conditions. While development of the Project would not be anticipated to cause wasteful, inefficient, and unnecessary consumption of energy resources due to compliance with existing regulations, further evaluation of the Project's demand on existing energy resources will be provided in the EIR.

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

Potentially Significant Impact. First established in 2002 under SB 1078, California's Renewables Portfolio Standard (RPS) is one of the most ambitious renewable energy standards in the country. The RPS program requires all electric load serving entities to procure 60 percent of its electricity portfolio from eligible renewable energy resources by 2030. The LADWP provides electrical service throughout the City. LADWP generates power from a variety of energy sources, including

hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources.

Regarding energy efficiency, the California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction, system design, and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2019 Title 24 standards, which became effective on January 1, 2020.³⁹ 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.⁴⁰

As previously described, the Project Site is currently developed with four commercial office structures, three bungalows, and surface parking areas. The Project Site does not include any renewable energy sources used by LADWP. The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. In addition, as discussed above, the Project would be designed to meet the standards for United States Green Building Council Leadership in Energy and Environmental Design *LEED* Certification and to meet the most recent WELL Building Standards. The Project also intends to obtain certification as an ELDP pursuant to PRC Section 21178, et seq. While the Project would not be anticipated to conflict with or obstruct a state or local plan for renewable energy or energy efficiency, further evaluation of the Project’s compliance with LADWP’s plans for renewable energy, as well as the Project’s compliance with California Building Energy Efficiency Standards, will be provided in the EIR.

VII. GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

³⁹ CEC, 2019 Building Energy Efficiency Standards, www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency, accessed January 12, 2022.

⁴⁰ CEC, 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, December 2018.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ii. Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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

Potentially Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,700 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement within the last 1.6 million years. In addition, buried thrust faults, which are faults with no surface exposure, may exist in the vicinity of the Project Site; however, due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

CGS establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 feet to 500 feet on

each side of a known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

Based on City data, the Project Site is not located within a City-designated Fault Rupture Study Area or an Alquist-Priolo Earthquake Fault Zone as mapped by CGS.⁴¹ The closest fault zone is associated with the Hollywood Fault and is located approximately 1,000 feet north of the Project Site. Notwithstanding, further evaluation in regard to the potential for fault rupture will be provided in the EIR.

ii. Strong seismic ground?

Potentially Significant Impact. The Project Site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. As previously stated, the closest fault zone is associated with the Hollywood Fault and is located approximately 1,000 feet north of the Project Site. The Project would increase the amount of development on-site, thereby increasing the number of people on-site exposed to potential adverse effects from ground shaking. Although Project construction must comply with the most current Los Angeles Building Code regulations, which specify structural requirements for different types of buildings in a seismically active area, further evaluation of the potential for strong seismic ground shaking will be provided in the EIR.

iii. Seismic-related ground failure, including liquefaction?

Potentially Significant Impact. Liquefaction potential is greatest where the groundwater level is shallow, and submerged loose, fine sands occur within a depth of about 50 feet or less. Liquefaction potential decreases as grain size and clay and gravel content increase. As ground acceleration and shaking duration increase during an earthquake, liquefaction potential increases. The Project Site is not located within an area identified by the City of Los Angeles, County of Los Angeles, or California Geological Survey as having a potential for liquefaction.^{42,43} Notwithstanding, further evaluation regarding the potential for liquefaction will be included in the EIR.

iv. Landslides?

No Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and the Project Site is generally characterized by relatively level topography. Given the largely impervious (developed/paved) nature of the Project Site, large areas of exposed soil or rocks that could slide or become loose are not

⁴¹ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5545-008-011, -012, -044, <http://zimas.lacity.org/>, accessed January 12, 2022.

⁴² Ibid.

⁴³ California Geological Survey, Earthquake Zones of Required Investigation, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed January 12, 2022.

present. In addition, the Project Site is not located in a landslide area as mapped by the State, nor is the Project Site mapped as a landslide area by the City of Los Angeles.^{44,45,46} Therefore, the Project would not directly or indirectly cause potential substantial adverse effects 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?

Potentially Significant Impact. Development of the Project would require grading, excavation, and other construction activities that have the potential to disturb existing soils within the Project Site and expose these soils to rainfall and wind during construction, thereby potentially resulting in soil erosion. This potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities during Project construction. Specifically, all grading activities would require grading permits from the City of Los Angeles Department of Building and Safety (LADBS), which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of LAMC Chapter IX, Article 1, which addresses grading, excavations, and fills. Furthermore, the Project would be required to comply with the City's LID ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Notwithstanding, further evaluation in regard to substantial soil erosion or loss of topsoil will be provided in the EIR.

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

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

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

Potentially Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. The Project Site may contain soils that are considered to have a moderate to high expansive potential. Therefore, further evaluation of expansive soils will be provided in the EIR.

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

⁴⁴ Ibid.

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

⁴⁶ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5545-008-011, -012, -044, <http://zimas.lacity.org/>, accessed January 12, 2022.

No Impact. The Project Site is located within a community served by existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of soils to support septic tanks or 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?

Potentially Significant Impact. No unique geologic features are located on-site. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Although the Project Site has been previously graded and developed, the Project would require grading, excavation up to a depth of 65 feet, and other construction activities that could have the potential to disturb existing but undiscovered paleontological resources. Therefore, further evaluation of the Project’s potential impacts to paleontological resources will be provided in the EIR.

VIII. GREENHOUSE GAS EMISSIONS

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

- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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

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

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

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

IX. HAZARDS AND HAZARDOUS MATERIALS

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

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

Less Than Significant Impact.

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. 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. In addition, all potentially hazardous materials to be 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. Construction of the Project would also 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.

Operation

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in office and commercial uses, including cleaning products, paints, and those used for maintenance of landscaping. 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 uses), operation of the Project would not involve the routine transport of hazardous materials to and from the Project Site. Therefore, with 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?

Potentially Significant Impact. As discussed in Section 2, Project Description, of this Initial Study, the Project Site is currently developed with four commercial office structures, three bungalows, and a surface parking lot. Given the age of the existing structures and the previous uses, asbestos containing materials (ACM) and/or lead-based paints (LBP) and other recognized environmental conditions may be present on site. Therefore, further evaluation will be included in the EIR to determine the Project's potential impacts with respect to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

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

Less Than Significant Impact. The nearest school is Emerson College, located approximately 200 feet southeast of the Project Site along Sunset Boulevard. As discussed above, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of office and commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed office and commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used in the vicinity of the Project Site. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. As such, the use of such materials would not create a significant hazard to nearby schools. 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 a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?

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

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

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

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

Less Than Significant Impact. The City of Los Angeles General Plan Safety Element addresses public protection from unreasonable risks associated with natural disasters (e.g., fires, floods, earthquakes) and sets forth guidance for emergency response. More specifically, the Safety Element includes Exhibit H, Critical Facilities and Lifeline Systems, which identifies emergency evacuation routes, or disaster routes, along with the location of selected emergency facilities. According to the

Safety Element, the nearest City-designated disaster route is Santa Monica Boulevard, located approximately 0.6 mile south of the Project Site.⁴⁷ While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, both directions of travel would continue to be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Additionally, the proposed haul route for the Project would be located along Sunset Boulevard and would not divert truck trips south toward Santa Monica Boulevard. With regard to operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area as set forth in California Vehicle Code (CVC) 21806(a)(1). In addition, the Project would comply with Los Angeles Fire Department (LAFD) access requirements and applicable LAFD regulations regarding safety. Therefore, with compliance with applicable regulatory requirements, the Project would not impede emergency access within the Project Site or vicinity that could cause an impediment along City designated disaster routes such that the Project would impair the implementation of the City's emergency response plan. As such, the Project's impact related to the implementation of the City's emergency response plan would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is located in an urbanized area without any wildlands in the vicinity. In addition, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone.^{48,49} Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety, and the proposed uses would not create a fire hazard that has the potential to exacerbate wildfire risks. Therefore, the Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death as a result of exposure to wildland fires, and, as such, no impact would occur. No further evaluation of this topic in the EIR is required.

⁴⁷ Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.

⁴⁸ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5545-008-011, -012, -044, <http://zimas.lacity.org/>, accessed January 12, 2022.

⁴⁹ City of Los Angeles General Plan Safety Element, November 1996, Exhibit D, Selected Wildfire Hazard Areas, p. 53.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Potentially Significant Impact. Project construction activities would have the potential to convey pollutants into municipal storm drains, particularly during precipitation events, and would have the potential to contact groundwater. In addition, potential changes in on-site drainage patterns resulting from Project implementation and the introduction of new land uses could affect the quality of storm

water runoff. Therefore, further evaluation of potential impacts associated with water quality will be included in an EIR.

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?

Potentially Significant Impact. A significant impact may occur if a project includes excavations that have the potential to interfere with groundwater movement or includes the withdrawal of groundwater or paving of existing permeable surfaces that are important to groundwater recharge. Given the largely impervious (developed/paved) nature of the Project Site, reductions to existing groundwater recharge are not anticipated as a result of Project implementation. During a storm event, stormwater runoff would continue to flow to the adjacent roadways where it is directed into the City's storm drain system. As such, the Project Site is not a source of groundwater recharge. Following redevelopment of the Project Site, groundwater recharge would remain negligible, similar to existing conditions.

However, development of the Project would include excavations to a maximum depth of 65 feet below grade and have the potential to encounter groundwater. Therefore, temporary dewatering may be required during the construction of the proposed subterranean parking levels. As such, further evaluation of potential impacts to groundwater supplies will be provided in an EIR.

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;

Potentially Significant Impact. As discussed in Response to Checklist Question VII.b., potential erosion impacts resulting from Project grading, excavation, and other construction activities that have the potential to disturb existing soils would be adequately reduced through compliance with LADBS grading permits, LAMC requirements, and the City's LID ordinance. However, given the potential for changes to existing drainage patterns on-site as a result of Project development, further evaluation of erosion and siltation in the context of potential hydrological changes on-site will be provided in an EIR.

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

Potentially Significant Impact. Potential changes in drainage patterns on-site could affect the rate or amount of surface water runoff on-site in a manner that could result in flooding on- or off-site. Thus, further evaluation of potential impacts will be included in an EIR.

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

Potentially Significant Impact. Potential changes in drainage patterns on-site could create or contribute runoff which could exceed the capacity of the local stormwater drain system, and Project construction activities as well as the introduction of new land uses could provide additional sources of

polluted runoff. Therefore, further evaluation of potential impacts associated with stormwater drainage capacity and polluted runoff will be included in an EIR.

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 evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed above, the Project Site is not located within a 100-year flood hazard area as mapped by FEMA or by the City. In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a tsunami hazard area.⁵² 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. According to the General Plan's Safety Element, the Project Site is not located within a flood impact zone.⁵³ However, the Project Site is mapped within an inundation area for the Hollywood Reservoir, which is held by the Mulholland Dam.⁵⁴ The Mulholland Dam is a LADWP dam located in the Hollywood Hills. The Mulholland Dam was built in 1924 and designed to hold 2.5 billion gallons of water. Dam safety regulations are the primary means of reducing damage or injury due to inundation occurring from dam failure. The California Division of Safety of Dams regulates the siting, design, construction, and periodic review of all dams in the State. In addition, LADWP operates the dams and mitigates the potential for overflow and seiche hazard through control of water levels and dam wall height. These measures include seismic retrofits and other related dam improvements completed under the requirements of the 1972 State Dam Safety Act. In addition, the City's Local Hazard Mitigation Plan, which was adopted in July 2011, provides a list of existing programs, proposed activities and specific projects that may assist the City of Los Angeles in reducing risk and preventing loss of life and property damage from natural and human-caused hazards, including dam failure. The Hazard Mitigation Plan evaluation of dam failure vulnerability classifies dam failure as a moderate risk rating.

Considering the above information and risk reduction projects, the risk of flooding from a tsunami, inundation by a seiche or dam failure is considered low. Impacts would be less than significant, and no 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 06037C1605F effective September 26, 2008.

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

⁵² Los Angeles General Plan Safety Element, November 1996, Exhibit G, Inundation and Tsunami Hazard Areas, p. 59.

⁵³ Los Angeles General Plan Safety Element, November 1996, Exhibit G, Inundation & Tsunami Hazard Areas, p. 59.

⁵⁴ Los Angeles General Plan Safety Element, November 1996, Exhibit G, Inundation & Tsunami Hazard Areas, p. 59.

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

Potentially Significant Impact. The Los Angeles Regional Water Quality Control Board’s (LARWQCB) Water Quality Control Plan for the Los Angeles Region (Basin Plan) establishes guidelines for all municipalities and other entities that use water and/or discharge into the Santa Monica Bay.⁵⁵ The Project Site is not located within the boundaries of a Groundwater Sustainability Agency; however, the Project Site is located within the Coastal Plain of Los Angeles Groundwater Basin.⁵⁶ Therefore, given the Project’s potential to affect water quality and groundwater recharge on-site, further evaluation of this issue will be included in an EIR.

XI. LAND USE AND PLANNING

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

a. Would the project physically divide an established community?

Less than Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with four commercial office structures, three bungalows (two vacant and one currently used for office/production purposes), and a surface parking lot totaling approximately 72,877 square feet. Properties to the north along Harold Way are developed with bungalows that include residential and hotel uses, and the IO Music Academy Production School, and are zoned [Q]R4-1VL. To the south of the Project Site across Sunset Boulevard are the Sunset Gower Studios, which are zoned M1-1. To the east of the Project Site are the Hollywood Palms Inn and Suites, which are zoned [Q]R4-1VL and C4-1-SN. Properties to the west of the Project Site are developed with commercial uses including a liquor store, restaurants/cafes, and office uses and are zoned C4-1 and C4-1-SN. Other nearby uses include Emerson College Los Angeles to the southeast along Sunset Boulevard, and the Columbia Square development with a 23-story tower located to the west along Sunset Boulevard.

⁵⁵ Water Quality Control Plan, Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, California Regional Water Quality Control Board Los Angeles Region 4 (adopted June 1994, amended December 2010).

⁵⁶ California Department of Water Resources, GSA Map Finder, <https://sgma.water.ca.gov/webgis/index.jsp?appid=gasmaster&rz=true>, accessed September 8, 2020.

As previously discussed, the Project includes the construction of a new office building with a total floor area of 524,034 square feet comprised of 489,863 square feet of office uses, 19,915 square feet of restaurant/event space, and a 14,256-square-foot screening room. These uses would be consistent with other developments located adjacent to and in the general vicinity of the Project Site. Additionally, all proposed development would also occur within the boundaries of the Project Site. Furthermore, the Project does not propose a freeway or other large infrastructure that could 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. Additionally, the Project could potentially conflict with land use plans, policies or regulations that were adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, further evaluation of this topic in an EIR is required.

XII. MINERAL RESOURCES

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

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

No Impact. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone or Surface Mining District where significant mineral deposits are known to be present or within a mineral producing area as classified by the California Geologic Survey.^{57,58} The Project Site is also not located within a

⁵⁷ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

⁵⁸ State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2012.

City-designated oil field or oil drilling area.⁵⁹ 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. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XIII. NOISE

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

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

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

⁵⁹ City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit E, November 26, 1996, p. 55.

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

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

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

No Impact. The Project Site is not located within the vicinity of a private airstrip. The closest private airstrip or airport is the Bob Hope Airport, which is approximately 7 miles north of the Project Site. In addition, the Project Site is not located within an area subject to an airport land use plan. Given the distance between the Project Site and the closest private airstrip and public airport, the Project would not have the potential to expose people that reside or work in the Project area to excessive noise levels from these sources of noise. No impacts would occur, and no mitigation is 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
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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 checked="" type="checkbox"/> | <input 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 office development. Since the Project does not propose a housing component, it would not directly induce a new residential population that would contribute to population growth in the vicinity of the Project Site. Additionally, while

construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project. As previously discussed, the Project includes the construction of a new office building with a total floor area of 524,034 square feet comprised 489,863 square feet of office uses, 19,915 square feet of restaurant/event space, and a 14,256-square-foot screening room. Four existing commercial office structures and three bungalows, totaling approximately 72,877 square feet of floor area, along with associated surface parking would be removed as part of the Project.

Based on employee generation factors from the City of Los Angeles Department of Transportation (LADOT)'s Vehicle Miles Traveled Calculator, the Project is estimated to generate a net increase of 1,817 new employees on the Project Site.^{60,61} As noted above, the Project would not introduce new homes at the Project site and would therefore not result in a direct population growth in the area. While some of the new employment positions could be filled by persons who would relocate to the vicinity of the Project Site, this potential increase in population would not be substantial since not all employees would move close to the Project Site. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project Site and other persons would commute to the Project Site from other communities. According to SCAG's 2020–2045 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2022 is approximately 1,907,803 employees.⁶² In 2027, the projected buildout year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,957,390 employees.⁶³ Therefore, the projected employment growth in the City between 2022 and 2027 based on SCAG's 2020–2045 RTP/SCS is approximately 49,586 employees. Thus, the Project's estimated 1,817 net new employees would constitute approximately 3.66 percent of the employment growth forecasted between 2022 and 2027.

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

⁶⁰ LADOT and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. The existing commercial office uses and bungalows to be removed produce approximately 296 employees (commercial office 68,097 square feet * 0.004) + (bungalow (office/production uses) 1,780 square feet * 0.004) = 279). The Project would produce 2,096 employees (office 489,863 square feet * 0.004 = 1,959) + (restaurant/event space 19,915 square feet * 0.002 = 80) + (screening room 14,256 * 0.004 = 57). Therefore, the Project would produce approximately 1,817 net new employees.

⁶¹ The existing occupied uses to be removed include four commercial office buildings and three bungalows (two of the bungalows are vacant and the third is used for office/production uses). Further, as two of the bungalows were vacant during baseline conditions, no existing employees were generated for those uses.

⁶² SCAG. 2020-045 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, p. 35. Based on a linear interpolation of SCAG's employment data for 2016 (1,848,300) and 2045 (2,135,900). The 2022 value is extrapolated from 2016 and 2045 values: $[(2,135,900 - 1,848,300) \div 29] * 6] + 1,848,300 = \sim 1,907,803$.

⁶³ SCAG. 2020-045 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, p. 35. Based on a linear interpolation of SCAG's employment data for 2016 (1,848,300) and 2045 (2,135,900). The 2027 value is extrapolated from 2016 and 2045 values: $[(2,135,900 - 1,848,300) \div 29] * 11] + 1,848,300 = \sim 1,957,390$.

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

Based on the above, the Project would not induce substantial unplanned population or housing growth. Impacts would be less than significant and no 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?

Less Than Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with four commercial office structures, three bungalows (two vacant and one currently used for office/production purposes), and a surface parking lot. Based on the generation rates for the three bungalows provided by the City of Los Angeles VMT Calculator Documentation, the existing bungalows could house up to approximately seven people.⁶⁴ This estimate is conservative, given one bungalow is currently used for office/production purposes and two bungalows are vacant. Existing uses on the Project Site do not accommodate any residents. Notwithstanding, for the purposes of this analysis, the Project would displace three existing residential units. However, the displacement would not require the construction of replacement housing elsewhere. As such, Project-level impacts with regard to displacing a substantial number of existing people or housing would be less than significant.. 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"/>

⁶⁴ Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the generation rate 2.25 persons per unit for "Multi-Family Residential" land use is applied to the three existing bungalows.

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

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

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

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

Potentially Significant Impact. Police protection for the Project Site is provided by the City of Los Angeles Police Department (LAPD). The Project would increase the floor area and associated occupancy on-site which could result in the need for additional police services during Project operation. Additionally, construction sites can be sources of nuisances and hazards and invite theft and vandalism. Therefore, further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). LAUSD is divided into six local districts.⁶⁵ The Project Site is located in Local District–West.⁶⁶

Construction

The Project would generate part-time and full-time jobs associated with construction of the Project between the start of construction and Project buildout. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, which require construction workers to commute to job sites that change many times in the course of a year, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. In addition, construction workers would be more likely to utilize schools near their places of residence. Therefore, the construction employment generated by the Project would not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts on school facilities during Project construction would be less than significant.

Operation

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of students within the service area of LAUSD. It is anticipated some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site and would therefore not increase the number of students. Further, as many employees are likely to commute to the Project Site, 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. Furthermore, pursuant to SB 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.

Based on the above, 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 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 (DRP). Nearby parks and recreational facilities within an approximate 2-mile radius of the Project Site include:

⁶⁵ LAUSD, Board of Education Districts Maps 2015–2016, June 2015.

⁶⁶ LAUSD, Board of Education Local District—West Map, July 2015.

Carlton Way Park (located 0.20 mile northeast of the Project Site); Seily Rodriguez Park (located 0.54 mile southeast of the Project Site); Hollywood Recreation Center and Pool (located 0.67 mile southwest of the Project Site); Selma Park (located 0.69 mile west of the Project Site); De Longpre Park (located 0.84 mile southwest of the Project Site); La Mirada Park (located 0.84 mile southeast of the Project Site); Yucca Park and Community Center (located 0.92 mile northwest of the Project Site); Las Palmas Senior Citizen Center (located 0.97 mile northwest of the Project Site); Lemon Grove Recreation Center (located 1.27 miles southeast of the Project Site); Dorothy and Benjamin Park (located 1.29 miles northwest of the Project Site); Barnsdall Art Park (located 1.53 miles east of the Project Site); Burns (Robert L.) Park (located 1.59 miles south of the Project Site); Runyon Canyon Park and Dog Park (located 1.65 miles northwest of the Project Site); Griffith Observatory (located 1.82 miles northeast of the Project Site); Poinsettia Recreation Center (located 1.83 miles southwest of the Project Site); and Wattles Mansion and Gardens (located 2.0 miles northwest of the Project Site).⁶⁷

Construction

Given the temporary nature of construction activities, construction of a project would not introduce a permanent population to an area which could result in an increase in the use of existing parks and recreational facilities that would result in the need for new parks and recreational facilities or the expansion of existing facilities. Additionally, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Additionally, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, which require construction workers to commute to job sites that change many times in the course of a year, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. Thus, construction of the Project would not generate a demand for park facilities that cannot be adequately accommodated by existing or planned facilities and services. Therefore, the construction workers associated with the Project would not result in a notable increase in the residential population within the vicinity of the Project Site, which would result in a corresponding permanent demand for parks in the vicinity of the Project Site. Impacts on parks during Project construction would be less than significant.

Operation

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create an additional demand for parks. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for

⁶⁷ DRP, Facility Map, Locator, [www.laparks.org/maplocator?cat_id=All&geo\[radius\]=10&geo\[latitude\]=34.0983539&geo\[longitude\]=-118.320898&address=6061%20Sunset%20Blvd,%20Los%20Angeles,%20CA%2090028,%20USA](http://www.laparks.org/maplocator?cat_id=All&geo[radius]=10&geo[latitude]=34.0983539&geo[longitude]=-118.320898&address=6061%20Sunset%20Blvd,%20Los%20Angeles,%20CA%2090028,%20USA), accessed January 12, 2022.

employees to access off-site local parks. In addition, Project employees would be more likely to use parks near their homes during non-work hours. The Project would include approximately 112,086 square feet of outdoor areas throughout the Project Site, reducing the likelihood that employees they would use local parks. Further, as discussed in Section 3, Project Description, of this Initial Study, the Project's three podium levels include a series of landscaped areas that are integrated with the street level. Specifically, the upper green roof area (Level 3 of the podium) would include a courtyard, great lawn, water features, exercise loop, and garden areas. The podium level also includes two lobbies for the funicular that would travel along a rail located on the outer edge of the building. The funicular would take visitors from the ground level all the way up to the building's sky dome level. The Project also incorporates two sky gardens into the building's design that serve as an extension of the indoor office areas. The landscaping on these levels would extend to the outer edge of the building, creating a linear ring that creates visual interest from other parts of the building. These outdoor spaces would include seating areas and viewing terraces. Lastly, the Project would also provide a roof level sky dome, which would serve as an observation area that allows visitors to view the city from the sky level. The sky dome would provide several landscaped areas and planters, seating areas, as well as water features. Therefore, new demand for public parks and recreational facilities associated with Project development would be limited. As such, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks or the need for new or physically altered parks. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Other public facilities provided to the Project Site include library services. The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles through its Central Library, 72 branch libraries, as well as through Web-based resources.⁶⁸ The Project area is served by existing LAPL facilities within the Hollywood Community Plan Area, including the Frances Howard Goldwyn–Hollywood Regional Library, which is the nearest to the Project Site located 0.45 mile northwest.

Construction

As previously discussed, construction of the Project would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of Project construction. In addition, construction workers would be more likely to use libraries near their places of residence during non-work hours. Therefore, Project-related construction workers would not result in a notable increase in the resident population within the service area of either library serving the Project Site or an overall corresponding demand for library services in the vicinity of the Project. As such, construction of the Project would not exceed the capacity of local libraries to adequately serve the

⁶⁸ Los Angeles Public Library Strategic Plan, 2015–2020.

existing residential population based on target service populations or as defined by the LAPL. Project construction would not substantially increase the demand for library services for which current demand exceeds the ability of the facility to adequately serve the population. Therefore, Project construction would not result in the need for new or physically altered governmental facilities, and impacts would be less than significant.

Operation

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

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 above, there are numerous public parks and recreational facilities within 2 miles of the Project Site. The closest major park to the Project Site is

Carlton Way Park, located approximately 0.20 mile northeast of the Project Site. Carlton Way Park includes a children's play area and outdoor fitness equipment.⁶⁹

Construction

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

Operation

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

Less Than Significant Impact. The Project would not include the construction of recreational facilities or require the expansion of recreational facilities, as discussed above in Response Checklist Question XV.d. Thus, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

⁶⁹ DRP, Facility Map Locator, [www.laparks.org/maplocator?cat_id=All&geo\[radius\]=10&geo\[latitude\]=34.0983539&geo\[longitude\]=-118.320898&address=6061%20Sunset%20Blvd,%20Los%20Angeles,%20CA%2090028,%20USA](http://www.laparks.org/maplocator?cat_id=All&geo[radius]=10&geo[latitude]=34.0983539&geo[longitude]=-118.320898&address=6061%20Sunset%20Blvd,%20Los%20Angeles,%20CA%2090028,%20USA) 1, accessed January 12, 2022.

XVII. TRANSPORTATION

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

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

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

- If the project is estimated to generate a net increase of 250 or more daily vehicle trips and requires discretionary action, a transportation assessment for a Development Project is required.
- If a project is likely to either: (1) induce additional vehicle miles traveled by increasing vehicle capacity; or (2) reduce roadway through-lane capacity on a street that exceeds 750 vehicles per hour per lane for at least two (2) consecutive hours in a 24-hour period after the project is completed, a transportation assessment is generally required.
- A transportation assessment is required by City ordinance or regulation.

The Project is anticipated to meet one or more of the thresholds listed above; therefore, a TA in accordance with LADOT's Transportation Assessment Guidelines (TAG) will be prepared for the Project. In accordance with the TAG and consistent with the City CEQA Transportation Thresholds (adopted July 30, 2019), the TA's CEQA-required analyses will include an assessment of whether the Project would result in potential conflicts with transportation-related plans, ordinances, or policies. Therefore, further evaluation of this topic will be included in the EIR.

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

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

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

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

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

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. According to the Safety Element, the nearest disaster route within the Project area is Santa Monica Boulevard, which is located approximately 0.6 mile south of the Project Site.⁷⁰ While it is expected that the majority of Project construction activities would be confined on site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Additionally, the proposed haul route for the Project would be located along Sunset Boulevard and would not divert truck trips south toward Santa Monica Boulevard. With regard to operation, the Project does not propose the closure of any local public streets, and primary access to the Project Site would continue to be provided from the adjacent roadways. In addition, the Project would comply with LAFD access requirements, including required fire lane widths, turning radii, secondary access, etc., and plot plans would be submitted to LAFD for approval. Therefore, the Project would not result in inadequate emergency access to the Project Site or surrounding uses. Impacts regarding emergency access would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

⁷⁰ Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<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 (Checklist Questions XVIII.a. and b.). Assembly Bill (AB) 52 established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in PRC Section 21074. As specified by AB 52, a lead agency must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to

engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As noted above, the Project would require excavations of up to approximately 65 feet, which could have the potential to disturb existing but undiscovered tribal cultural resources. Therefore, the potential exists for the Project to impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with AB 52, the City will notify all applicable tribes, and the City will participate in any requested consultations for the Project. Further evaluation of this topic will be provided in the EIR.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<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), which link the location of these facilities to an individual development site. Given the Project's increase in floor area within the Project Site and the potential corresponding increase in water, electricity, and natural gas demand and wastewater generation, further analysis of these topics will be provided in the EIR. Provided below is a discussion of the Project's impacts related to stormwater drainage and telecommunication facilities.

With regard to stormwater drainage, as discussed above in Response to Checklist Question X.c.iii., the entire Project Site is virtually impervious in the existing condition. At buildout of the Project, the Project Site would be comprised of approximately 100-percent impervious areas. Accordingly, there is no incremental increase or decrease in the imperviousness of the Project Site. In addition, 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. As such, the Project would not create runoff which would exceed the capacity of existing or planned drainage systems. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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

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

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

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

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

Less Than Significant Impact. While the Los Angeles Bureau of Sanitation (LASAN) generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential, commercial and institutional developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the Los Angeles County are categorized as either Class III (e.g., landfills permitted to accept non-hazardous and non-designated solid waste) or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, is disposed of in inert waste landfills.⁷¹ Ten Class III landfills and one inert landfill are currently operating within the County.⁷² In addition, there is one solid waste transformation facility within Los Angeles County (Southeast Resource Recovery Facility) that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery.⁷³

Based on the 2019 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the most recent report available, the total amount of solid waste disposed of at in-county Class III landfills, transformation facilities, and exports to out-of-County landfills was 10.70 million tons in 2019. The total remaining permitted Class III landfill capacity in the County is estimated at 148.40 million tons, with a total estimated daily disposal rate of 34,305 tons per day, and the remaining lifespan of each landfill ranges from 9 to 36 years.⁷⁴ In addition, the permitted inert waste landfill serving the County is Azusa Land Reclamation.⁷⁵ This facility has 58.84 million tons of remaining capacity and an average

⁷¹ Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples include sand and concrete.

⁷² County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020. The ten Class III landfills serving the County include the Antelope Valley Landfill, Burbank Landfill, Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, San Clemente Landfill, Whittier (Savage Canyon) Landfill, Scholl Canyon Landfill, and Sunshine Canyon City/County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

⁷³ County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.

⁷⁴ County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.

⁷⁵ As of 2019, according to the Los Angeles County Integrated Waste Management Plan 2019 Annual Report, the Azusa Land Reclamation facility is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

daily in-County disposal rate of 854 tons per day.⁷⁶ 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.⁷⁷

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

Construction

As previously discussed, the Project includes the construction of a new office building with a total floor area of 524,034 square feet comprised of 489,863 square feet of office uses, 19,915 square feet of restaurant/event space, and a 14,256-square-foot screening room. Four existing commercial office structures and three bungalows, totaling approximately 72,877 square feet of floor area, along with associated surface parking would be removed, as part of the Project. Pursuant to the requirements of SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of its non-hazardous demolition and construction debris. In addition, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. As discussed above, non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, is disposed of in inert waste landfills. Thus, although the total diversion rate may ultimately exceed 75 percent, this analysis conservatively assumes a diversion rate of 75 percent.

After accounting for mandatory recycling, as shown in Table 3 on page 82, the Project would generate a total of approximately 5,648 tons of demolition debris and 1,020 tons of construction debris, for a combined total of 6,668 tons of construction-related waste generation. Applying the 75 percent diversion rate, the Project would dispose of approximately 1,667 tons of construction-related waste in Azusa Land Reclamation Landfill throughout the construction period. This amount of construction and debris waste would represent approximately 0.003 percent of the Azusa Land Reclamation Landfill's remaining disposal capacity of 58.84 million tons.⁷⁸ It should be noted that soil export is not included in the calculation of construction waste since soil is not disposed of as waste but, rather, is typically used as a cover material or fill at other construction sites requiring soils import. As reported above, the Azusa Land Reclamation landfill, the County's inert waste landfill, would be able to accommodate waste from the Project's construction activities.

Based on the above, Project construction would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, the Project's potential construction-related impacts on solid waste facilities would be less than significant, and no mitigation measures would be required.

⁷⁶ County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.

⁷⁷ County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.

⁷⁸ $1,667 \text{ tons} \div 58.84 \text{ million tons} = 0.003 \text{ percent}$.

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

Land Use	Size	Generation Rate (lbs/sf) ^b	Total (tons) ^c
Demolition Waste			
Four Commercial Office Buildings	68,097 sf	155	5,278
Three Bungalows ^a	4,780 sf	155	370
<i>Total Demolition Waste</i>			5,648
Construction Waste			
Office	489,863 sf	3.89	953
Restaurant/Event Space	19,915 sf	3.89	39
Screening Room	14,256 sf	3.89	28
<i>Total Construction Waste</i>			1,020
Total Demolition and Construction Waste (prior to diversion)			6,668
Total Disposal (After 75% Diversion)			1,667
<p><i>lbs = pound</i> <i>sf = square feet</i> ^a Two of the bungalows (totaling approximately 3,000 square feet) are vacant, and the third (approximately 1,780 square feet) is used for office/production uses. ^b U.S. Environmental Protection Agency, <i>Estimating 2003 Building-Related Construction and Demolition Materials Amounts</i>, Report No. EPA530-R-09-002, March 2009, Tables 4 and 6; <i>Eyestone Environmental, 2022</i>. Based on the non-residential demolition debris generation rate of 155 pounds per square foot and the non-residential construction debris generation rate of 3.89 pounds per square foot. ^c 1 ton is equal to approximately 2,000 pounds. Source: <i>Eyestone Environmental, 2022</i>.</p>			

Operation

Based on employee generation factors from the City of Los Angeles Department of Transportation (LADOT)'s Vehicle Miles Traveled Calculator, the Project is estimated to generate a net increase of 1,817 new employees on the Project Site.^{79,80,81} As shown in Table 4 on page 83, based on solid

⁷⁹ LADOT and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. The existing commercial office uses and bungalows to be removed produce approximately 296 employees (commercial office 68,097 square feet * 0.004) + (bungalow (office/production uses) 1,780 square feet * 0.004) = 279). The Project would produce 2,096 employees (office 489,863 square feet * 0.004 = 1,959) + (restaurant/event space 19,915 square feet * 0.002 = 80) + (screening room 14,256 * 0.004 = 57). Therefore, the Project would produce approximately 1,817 net new employees.

⁸⁰ The existing occupied uses to be removed include four commercial office buildings and three bungalows (two of the bungalows are vacant and the third is used for office/production uses). Further, as two of the bungalows were vacant during baseline conditions, no existing employees were generated for those uses.

⁸¹ The Project proposes approximately 504,119 square feet of total office floor area, which would include supporting uses such as the 14,256-square-foot screening room, meeting rooms, and conference rooms.

**Table 4
Estimated Project Solid Waste Generation**

Land Use	Size	Employee Generation Rate ^a	Estimated No. of Employees	Solid Waste Generation Rate ^b	Total Generation (tons/year)
Existing to Be Removed					
Four Commercial Office Buildings	68,097 sf	0.004	272	0.37 tn/emp/yr	101
Bungalow (office/production uses)	1,780 sf	0.004	7	0.37 tn/emp/yr	3
Vacant Bungalows	3,000 sf	0	0	—	—
<i>Total Existing to Be Removed</i>					104
Proposed					
Office	489,863 sf	0.004	1,959	0.37 tn/emp/yr	725
Restaurant	19,915 sf	0.004	80	2.98 tn/emp/yr	237
Screening Room	14,256 sf	0.004	57	0.37 tn/emp/yr	21
<i>Total with Implementation of Project</i>					983
Total Net Increase (prior to diversion)					879
Total Net Disposal (after 50% diversion/recycling)					440
<hr/> <i>tn = tons</i> <i>emp = employees</i> <i>yr = year</i> ^a <i>Employee Generation Rates from Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, Table 1, May 2020. Based on the employee generation rate of 4.0 employees per 1,000 square feet for “General Office” and employee generation rate of 4.0 employees per 1,000 square feet for “High-Turnover Sit-Down Restaurant.”</i> ^b <i>Non-residential yearly solid waste generation factors from LASAN City Waste Characterization and Quantification Study, Table 4, July 2002. Assumes rate of 0.37 ton per employee per year (Services—Business) for office and screening room uses, and rate of 2.98 ton per employee per year (Retail—Restaurants) for restaurant uses.</i> <i>Source: Eyestone Environmental, 2022.</i>					

waste generation factors from LASAN, the Project would generate approximately 879 net tons of solid waste per year. The estimated amount of solid waste is conservative because the waste generation factors do not account for recycling or other waste diversion measures. For example, the estimate does not take into account AB 939, which requires California cities, counties, and approved regional solid waste management agencies responsible for enacting plans and implementing programs to divert 50 percent of their solid waste away from landfills. The estimate also does not take into account compliance with AB 341, which requires California commercial enterprises and public entities that generate four or more cubic yards per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City’s

recyclA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.

The Project's estimated solid waste disposal of 879 tons per year represents approximately 0.0006 percent of the remaining capacity (148.40 million tons) at the County's Class III landfills that serve the County.⁸² The Project's estimated solid waste generation would therefore represent a nominal percentage of the remaining daily disposal capacity of those landfills. As such, Project operation would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, the Project's potential operational impacts to solid waste facilities would be less than significant, and no mitigation measures would be required.

Furthermore, as described in the 2019 Annual Report, the County will continue to address landfill capacity through the preparation of ColWMP annual reports. The preparation of each annual report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Solid waste disposal is an essential public service that must be provided without interruption in order to protect public health and safety, as well as the environment. Jurisdictions in the County of Los Angeles continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning directives. These efforts, together with countywide and regional programs implemented by the County and the cities, acting in concert or independently, have achieved significant, measurable results, as documented in the 2019 Annual Report.

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste generated by construction and operation of the Project. Therefore, the Project's potential impacts related to solid waste generation would be less than significant, and mitigation measures are not required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate 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

⁸² (879 tons per year ÷ 148.40 million tons) * 100 = 0.0006 percent.

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 waste⁸³ 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 Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.⁸⁴ 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
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"/>

⁸³ 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.

⁸⁴ Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

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

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

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

No Impact (Checklist Questions XVIII.a. through d.). The Project Site is located in an urbanized, generally flat area, and there are no wildlands or steep slopes located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone, nor is it located within a City-designated fire buffer zone.^{85,86} Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. No impacts regarding wildfire risks or related post-fire conditions would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

⁸⁵ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5545-008-011, -012, -044, <http://zimas.lacity.org/>, accessed January 12, 2022. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older “Mountain Fire District” and “Buffer Zone” shown on Exhibit D of the Los Angeles General Plan Safety Element.

⁸⁶ City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

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

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

However, as discussed above, the three existing bungalows on the Project Site have been designated as contributors to the Selma–La Baig Historic District. Additionally, the Project would require excavation up to a depth of 65 feet, and the Project could have the potential to disturb previously undiscovered archaeological and paleontological resources. Therefore, the Project would have the potential to impact important examples of the major periods of California history or prehistory. Further evaluation of the Project’s potential impacts to cultural resources will be included in an EIR.

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

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

- **Aesthetics**— Pursuant to SB 743 and ZI No. 2452, the Project is considered an employment center project on an infill site within a transit priority area, and thus in accordance with PRC Section 21099(d)(1), the Project’s aesthetic impacts shall not be considered significant impacts on the environment. Given the level of urbanization and transit in the Project vicinity, the majority of related projects would likewise be subject to SB 743 and could not combine with the Project to generate cumulative impacts under CEQA. Any related projects that are not subject to SB 743 would require appropriate analysis of potential impacts and mitigation, as necessary, to reduce such impacts to the extent feasible.
- **Agriculture, Forestry Resources, and Mineral Resources**—With regard to agriculture, forest resources, and mineral resources, no such resources are located on the Project Site or in the surrounding area. The Project would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts. As such, cumulative impacts to agriculture, forest resources, and mineral resources would be less than significant.
- **Air Quality (Odors)**—No objectionable odors are anticipated as a result of either construction or operation of the Project. Additionally, like the Project, any odors that may be generated during construction of the related projects would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. Furthermore, it is anticipated that the related projects would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations, like the Project. As such, the Project’s contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.
- **Biological Resources**—The Project vicinity is highly urbanized, and similar to the Project, other developments occurring in the vicinity would occur on previously disturbed land. The Project Site does not contain any sensitive biological resources, and there are no native or protected trees located on-site or within the adjacent rights-of-way. Like the Project, related projects involving tree removals would be required to comply with the Migratory Bird Treaty Act, which regulates vegetation removal during the nesting season to ensure

significant impacts to migratory birds do not occur. As such, the Project would not contribute to a cumulative effect associated with biological resources.

- Cultural Resources (Human remains)—With regard to human remains, like the Project, if human remains are discovered during construction of the related projects, work in the immediate vicinity of the construction area would be halted, and the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e) like the Project. Therefore, compliance with the regulatory standards would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.
- Geology and Soils (Landslides and septic tanks)—Due to their site-specific nature, geology and soils impacts, including those related to landslides and the ability of soils to support septic tanks or alternative wastewater disposal systems, are typically assessed on a project-by-project basis or for a particular localized area. Therefore, as with the Project, related projects would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. Thus, impacts would not be cumulatively considerable and would be less than significant.
- Hazards and Hazardous Materials—Due to their site-specific nature, hazards and hazardous materials impacts are typically assessed on a project-by-project basis. Therefore, as with the Project, related projects would address site-specific hazards through the implementation of site-specific recommendations and/or mitigation measures. In addition, as with the Project, all related development located in the vicinity of the Project Site would be subject to local, regional, state, and federal regulations pertaining to hazards and hazardous materials. Therefore, with adherence to applicable regulations and implementation of site-specific recommendations and/or mitigation measures, cumulative impacts would be less than significant.
- Hydrology and Water Quality (Impede or redirect floods and inundation)—Due to their site-specific nature, impacts related to projects impeding or redirecting floods and inundation 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 hydrology. Therefore, with adherence to applicable regulations and implementation of site-specific recommendations and/or mitigation measures, cumulative impacts would be less than significant.
- Land Use and Planning (Physically divide an established community)—No related projects that could cause land use incompatibility are known to be located in the immediate vicinity of the Project Site. Additionally, the Project's scope of work is limited to the Project Site, and the requested discretionary actions are site-specific. The Project would not amend or change the land use designation or zones of any of the other properties in the vicinity. Project-level impacts related to physically dividing an established community would be less than significant, and therefore could not combine with other projects to result in cumulative impacts. As such, cumulative impacts would be less than significant.

- Noise (Private airstrip or an airport land use plan)—Due to the site-specific nature, impacts related to projects exposing people that reside or work in the vicinity of related projects to excessive noise levels from a private airstrip or airport are typically assessed on a project-by-project basis. The Project Site is not located within the vicinity of a private airstrip or within an area subject to an airport land use plan. The Project would have no impact, and therefore could not combine with other projects to result in cumulative impacts. As such, cumulative impacts would be less than significant.
- Population and Housing— 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 longstanding 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 displace housing associated with the removal of the three bungalows, these bungalows have been recently used for commercial uses and two of the bungalows are vacant. Thus, the removal of the bungalows would not result in the substantial displacement of people requiring the construction of replacement housing elsewhere. Other related projects could also 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. As part of the environmental review processes for the related projects, it is expected that mitigation measures would be established as necessary to address potential impacts related to population and housing. Thus, the Project impacts related to population and housing would not be cumulatively considerable, and cumulative impacts would be less than significant.
- Public Services (Schools, Parks, and Libraries)—Similar to the Project, construction of related projects would generate part-time and full-time jobs associated with construction of the related projects between the start of construction and buildout. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, which require construction workers to commute to job sites that change many times in the course of a year, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. Therefore, like the Project, the construction employment generated by the related projects would not result in a notable increase in the resident population or a corresponding demand for schools, parks, and libraries in the vicinity of the Project Site. With regard to operation, the Project would not generate a residential population that would directly increase the demand for schools, parks, and libraries, although the increase in commercial development could indirectly increase the demand for these services. Other related projects could also increase the demand for these services and facilities. However, in the case of schools, the applicants for most related projects would be required to pay school impact fees, which would offset any potential impact to schools associated with the related projects. Similarly, in the case of parks and recreational facilities (i.e., existing neighborhood and regional parks), projects with residential components would be required by the LAMC to include open space and pay park in-lieu fees (as required), which would help reduce the demand on neighborhood and regional parks, thereby reducing the likelihood that there would be substantial deterioration of parks. Employees generated by the non-residential related projects would be more likely to use parks and library facilities near their homes during non-work hours, as opposed to patronizing local facilities on their way to or from work or during their lunch hours. In addition, each related project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.)

that could be applied toward the provision of enhancing park facilities and library services in the City, as deemed appropriate. These revenues to the City's General Fund would help offset the increase in demand for park facilities and library services as a result of the Project and the related projects. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to schools, parks, and libraries. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Utilities and Service Systems—Solid Waste**—The Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction periods. However, as discussed in Checklist Question No. XIX, unclassified landfills in the County do not generally have capacity concerns, and inert landfills serving the Project and the related projects would have sufficient capacity to accommodate construction waste disposal needs. With regard to operational solid waste disposal needs, the increase in solid waste generated by the Project would be well within the capacity of existing landfills, as discussed in Checklist Question No. XIX of this Initial Study. In addition, with the implementation of solid waste policies and objectives intended to help achieve the requirements of AB 939 and the City's 90 percent diversion goal, it is expected that the Project and related projects would not substantially reduce the projected timeline for landfills within the region to reach capacity. Furthermore, the County of Los Angeles conducts ongoing evaluations to ensure that landfill capacity is adequate to serve the forecasted disposal needs of the region. Therefore, the Project would not contribute considerably to cumulative solid waste impacts, and cumulative solid waste impacts would be less than significant.
- **Wildfire**—As discussed above, the Project Site is located in an urbanized area and there are no wildlands located in the vicinity of the Project Site. Therefore, the Project would not contribute to an increased wildfire risk. Moreover, the Project and related projects would be developed in accordance with LAMC and LAFD requirements pertaining to fire safety. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to wildfires. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

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

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