CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
CITY HALL 200 NORTH SPRING STREET LOS ANGELES CA 90012

Initial Study/ Mitigated Negative Declaration

Echelon Studios Project

Case Number: **ENV-2021-7332-MND**

Project Location: 5601 - 5673 West Santa Monica Boulevard, 5612 - 5672 West Virginia Avenue, and 1110 - 1118 North Wilton Place, Los Angeles, CA 90038

Community Plan Area: Hollywood

Council District: 13—Soto-Martinez

Project Description: The Echelon Studios Project (the "Project") proposes the construction of a new approximately 510,621-square-foot production studio and creative office campus located at 5601 - 5673 West Santa Monica Boulevard, 5612 - 5672 West Virginia Avenue, and 1110 - 1118 North Wilton Place (the "Project Site"), within the Hollywood Community Plan area in the City of Los Angeles (the "City"). The Project has been designed to incorporate a variety of interconnected uses geared toward the entertainment industry in single building, standing up to six stories and 93 feet in height, that would include approximately 109,957 square feet of production studios and related support space, 388,286 square feet of creative office space, and 12,378 square feet of restaurant space on a walkable campus. The Project would also include approximately 981 vehicular parking spaces on-site in a two-level subterranean parking garage and approximately 162 bicycle spaces in the first subterranean parking garage level and on the ground floor. The Project would be built on a 225,456-square-foot lot (including 11,373-square-foot alleyway), resulting in a site-wide Floor Area Ratio (FAR) of up to 2.26 to 1. The Project would require a Vesting Tentative Tract Map for the merger of an existing 11,373-square-foot public alley that runs through the Project Site, subdivision resulting in a ground lot and eight air space lots, and a waiver for all dedication and street widening requirements along North Wilton Place, West Santa Monica Boulevard, and along the public alley. The anticipated outbound haul route from the Project Site would be along Santa Monica Boulevard to the 101 Freeway. Approximately 251,000 cubic yards of soil would be excavated and exported from the Project Site.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

EcoTierra Consulting, Inc.
633 W. 5th Street, 26th Floor
Los Angeles, California 90071

APPLICANT:

Santa Monica Boulevard Owner, LLC
1015 N. Fairfax Avenue
West Hollywood, California 90046

April 27, 2023

INITIAL STUDY

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INITIAL STUDY

1 INTRODUCTION

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

This IS/MND evaluates potential environmental effects resulting from construction and operation of the Project. This IS/MND has been prepared in accordance with CEQA (Public *Resources* Code §21000 et seq.), the state CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). Based on the analysis provided within this IS/MND, the City has concluded that, with incorporation of the identified mitigation, which has been agreed to by the Applicant, the Project would not result in significant impacts on the environment. This IS/MND is intended as an informational document and is ultimately required to be adopted by the decision-making body prior to project approval by the City. Because this IS/MND is an informational document, the Project's effects are shown both without and with the mitigation the Applicant has agreed to incorporate into the Project.

1.1 PURPOSE OF AN INITIAL STUDY

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

An 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]

1.2 ORGANIZATION OF THE INITIAL STUDY

This IS/MND is organized into sections as follows:

1 INTRODUCTION

Describes the purpose and content of the IS/MND 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 IS/MND Checklist and discussion of the environmental factors that would be potentially affected by the Project.

5 MITIGATION MONITORING PROGRAM

The Mitigation Monitoring Program (MMP) is the document that will be used by the enforcement and monitoring agencies responsible for the implementation of the mitigation measures and Project Design Features that have been incorporated into the Project . The mitigation measures and Project Design Features that have been incorporated into the Project are listed by environmental topic.

1.3 CEQA PROCESS

In compliance with the state CEQA Guidelines, the City, as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. As described below, throughout the CEQA process, efforts will be made to inform, contact, and solicit input on the Project from various government agencies and the general public, including stakeholders and other interested parties.

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.

1.3.1 Initial Study

At the onset of the environmental review process, the City prepared this Initial Study to determine if the Project may have a significant effect on the environment. This Initial Study determined that the Project could have potentially significant environmental impacts, but that mitigation measures incorporated into the Project agreed to by the applicant would avoid or reduce such impacts to a point where clearly no significant impacts would occur. Therefore, the City determined that a Mitigated Negative Declaration was appropriate.

A Notice of Intent to Adopt a Mitigated Negative Declaration (MND) or Negative Declaration (ND) is provided to inform the general public, responsible agencies, trustee agencies, and the county clerk of the availability of the IS/MND and the locations where the document can be reviewed. A 20-day review period (or 30-day review period when the document is submitted to the state Clearinghouse for state agency review) is identified to allow the public and agencies to review the document. The notice has been mailed to any interested parties and is noticed to the public through publication in a newspaper of general circulation.

At the conclusion of the review period, the decision-making body will consider the IS/MND, together with any comments received during the public review process, and may adopt the MND and approve the Project. In addition, when approving a project for which an MND or ND has been prepared, the decision-making body must find that there is no substantial evidence that the project would have a significant effect on the environment, and that the ND or MND reflects the lead agency's independent judgement and analysis. When adopting an MND, the lead agency must also adopt a mitigation monitoring and reporting program to ensure that all proposed mitigation measures are implemented to mitigate or avoid significant environmental effects.

INITIAL STUDY

2 EXECUTIVE SUMMARY

PROJECT TITLE	**Echelon Studios Project**
ENVIRONMENTAL CASE NO.	**ENV-2021-7332-EIR**
RELATED CASES	CPC-2021-7331-ZC-HD-MCUP-SPR VTT-83478

PROJECT LOCATION	5601 - 5673 West Santa Monica Boulevard, 5612 - 5672 West Virginia Avenue, and 1110 - 1118 North Wilton Place, Los Angeles, CA 90038
COMMUNITY PLAN AREA	Hollywood
GENERAL PLAN DESIGNATION	Neighborhood Office Commercial
ZONING	C4-1VL, R4-1VL
COUNCIL DISTRICT	13 - Soto-Martinez

LEAD AGENCY	**City of Los Angeles**
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	Oliver Netburn
ADDRESS	200 North Spring Street, Room 763, Los Angeles, California 90012
PHONE NUMBER	(213) 978-1382
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APPLICANT	Santa Monica Boulevard Owner, LLC
ADDRESS	1015 N. Fairfax Avenue, West Hollywood, California 90046
PHONE NUMBER	(323) 461-8815

PROJECT DESCRIPTION

The Echelon Studios Project (the "Project") proposes the construction of a new approximately 510,621-square-foot production studio and creative office campus located at 5601 - 5673 West Santa Monica Boulevard, 5612 - 5672 West Virginia Avenue, and 1110 - 1118 North Wilton Place (the "Project Site"), within the Hollywood Community Plan area in the City of Los Angeles (the "City"). The Project has been designed to incorporate a variety of interconnected uses geared toward the entertainment industry in a single building, standing up to six stories and 93 feet in height, that would include approximately 91,870 square feet of production studios and related support space, 18,087 square feet of stage support area, 388,286 square feet of creative office space, and 12,378 square feet of restaurant space on a walkable campus. The Project would also include approximately 981 vehicular parking spaces on-site in a two-level subterranean parking garage and approximately 162 bicycle spaces in the first subterranean parking garage level and on the ground floor. The Project would be built on a 225,456-square-foot lot (including 11,373-square-foot alleyway), resulting in a site-wide Floor Area Ratio (FAR) of up to 2.26 to 1. The Project would require a Vesting Tentative Tract Map for the merger of an existing 11,373-square-foot public alley that runs through the Project Site, subdivision resulting in a ground lot and eight air space lots, and a waiver for all dedication and street widening requirements along North Wilton Place, West Santa Monica Boulevard, and along the public alley.

The Applicant is requesting the following discretionary approvals: a Zone Change and Height District Change. Pursuant to LAMC Section 12.32, the Applicant seeks a Zone Change and Height District Change as follows: from R4-1VL and C4-1VL to C4-2D, a Site Plan Review, a Vesting Tentative Tract Map, including a waiver of dedication and street widening requirements, and a Main Conditional Use Permit for Alcohol. Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, haul route approval, temporary street closure permits, demolition permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

(For additional detail, see "Section 3. PROJECT DESCRIPTION").

ENVIRONMENTAL SETTING

The Project Site is comprised of one parcel, with Assessor Parcel Number (APN No. 5536-012-017), that is rectangular in shape and contains an 11,373-square-foot alley to be vacated. The Project Site totals 225,456 square feet in area. The relatively flat Project Site is currently improved with a surface parking lot and the former three-story, 98,352-square-foot Sears building originally constructed in 1928. The Project Site is also surrounded by 15 non-protected street trees, plus two sucker growth trees at the site of previous street trees. The sucker growth trees are not in the form of a street tree as one is low branching and the other is multi-branched. Furthermore, as they are sucker growth from the previous street trees, there is also a chance that should they grow larger, they could fail and cause injury. Both should not be considered street trees but were included for documentation because of the size of the trunks.

The Project Site is located in an urban area characterized by low to mid rise buildings. The Project Site is bounded by West Santa Monica Boulevard and commercial uses to the south; North Saint Andrews Place, commercial uses, and a vacant lot to the east; North Wilton Place, residential

uses and commercial uses to the west; and West Virginia Avenue and residential uses to the north.

(For additional detail, see “Section 3. PROJECT DESCRIPTION”).

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

(e.g. permits, financing approval, or participation agreement): None.

CALIFORNIA NATIVE AMERICAN CONSULTATION

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Yes, a notification was sent on December 12, 2021 to various tribes. The City received correspondence and request for consultation from one tribe, the Gabrieleno Band of Mission Indians - Kizh Nation on 14 December 2021. Consultation was held on 10 February 2022. A follow up meeting was held on 19 May 2022. Materials were sent from the Tribe after both meetings.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission’s Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

Oliver Netburn, City Planner
PRINTED NAME, TITLE

DATE

EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

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

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

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

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

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

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

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

9) The explanation of each issue should identify:

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

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

INITIAL STUDY

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Echelon Studios Project proposes the construction of a new approximately 510,621-square-foot production studio and creative office campus, located at 5601 - 5673 West Santa Monica Boulevard, 5612 - 5672 West Virginia Avenue, and 1110 - 1118 North Wilton Place (Project Site), within the Hollywood Community Plan area in the City of Los Angeles. The Project has been carefully designed to incorporate a variety of interconnected uses geared toward the entertainment industry in a single building, standing up to six stories and 93 feet in height, that would include approximately 109,957 square feet of production studios and related support space, 388,286 square feet of creative office, and 12,378 square feet of restaurant space on a walkable campus. The Project would also provide approximately 981 vehicular parking spaces on-site in a two-level subterranean parking garage and approximately 162 bicycle spaces in the first subterranean parking garage level and on the ground floor. The Project would be built on a 22,456-square-foot lot, resulting in a site-wide Floor Area Ratio (FAR) of up to 2.26 to 1.

The Project would provide 46,292 square feet of non-required private and common open space for the proposed office and studio tenants. This open space would include private terraces, common terraces, seating areas, and landscaping.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site's location within the City of Los Angeles and greater Los Angeles region is depicted in Figure 3.1, *Regional and Vicinity Map*. The Project Site is located at 5601 - 5673 West Santa Monica Boulevard, 5612 - 5672 West Virginia Avenue, and 1110 - 1118 North Wilton Place, and is bounded by West Santa Monica Boulevard and commercial uses to the south; North Saint Andrews Place, commercial uses, and a vacant lot to the east; North Wilton Place, multifamily residential uses and commercial uses to the west; and West Virginia Avenue and multifamily residential uses to the north.

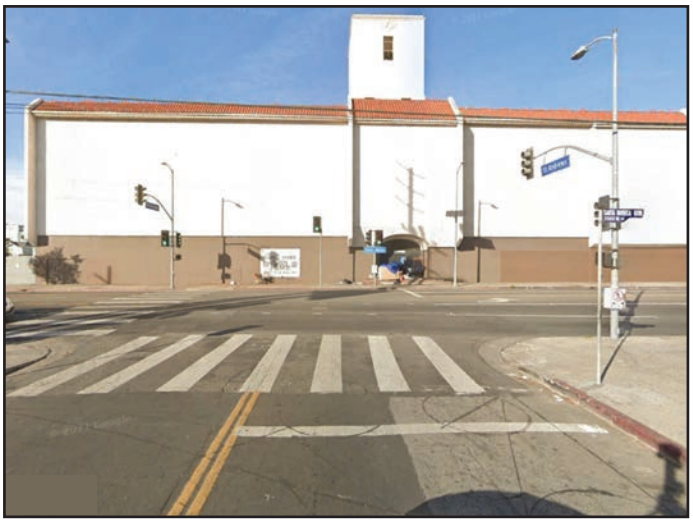
Regional access to the Project Site is provided by the 101 Freeway, located approximately 0.26 miles east of the Project Site. Local access to the Project Site is provided via West Santa Monica Boulevard and North Wilton Place.

3.2.2 Existing Conditions

The Project Site is comprised of one parcel, with Assessor Parcel Number (APN No. 5536-012-017), that is rectangular in shape and an 11,373-square-foot alley to be vacated. The Project Site totals 225,456 square feet in area. As shown in Figure 3.2, *Existing Site Photos*, the relatively flat Project Site is currently improved with a surface parking lot and the former three-story, 98,352-

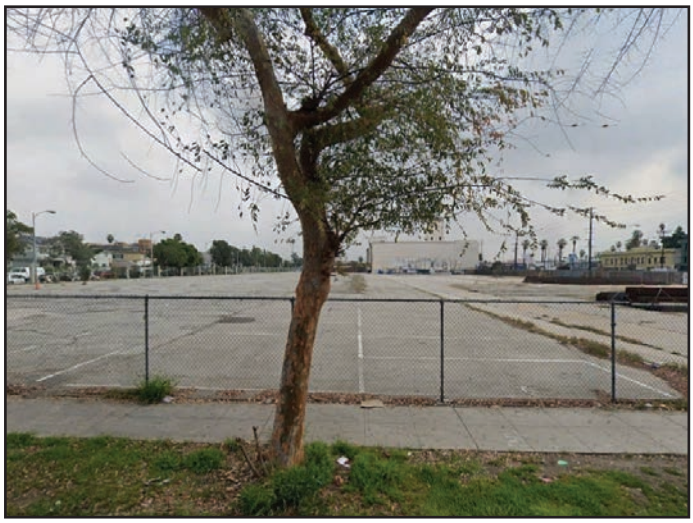
Source: Google Earth, 2021.

Figure 3.1
Regional and Project Vicinity Map



View 1: View to the north of the Sears Building.

View 2: View to the southwest of the Sears Building and parking lot.



View 3: View to the east of the Sears Building and parking lot.

PROJECT SITE

PHOTO LOCATION MAP

Source: EcoTierra and GoogleEarth, September 2021.

Figure 3.2
Existing Site Photos
View 1, 2 and 3

square-foot Sears building originally constructed in July 1928 by architect George C. Nimmons and Associates. At the time the building was constructed, much of the surrounding area was residential with a mix of single- and multi-family properties. There were only a handful of commercial buildings along this stretch of Santa Monica Boulevard, and most served as mixed-use properties with commercial on the ground floor or front of the property and residences on the second floor or rear of the property. The building was also in proximity to the streetcar line located at West Santa Monica Boulevard and Western Avenue.

Over the next ten years, Sears expanded their property, occupying almost half of the block along West Santa Monica Boulevard. Numerous additions were constructed in the 1930s including a pottery sales building and a tire and battery building.

In the 1940s and 1950s, Sears expanded the Santa Monica Boulevard store with the construction of a greenhouse and a display cottage, and the expansion of their tire and sales building to accommodate an auto service station. In 1972, a new one-story addition was constructed, and a new exterior was applied. In 2008, Sears closed the Santa Monica store. Currently, the former Sears Department Store is vacant, and the rest of the property is occupied by surface parking.

The Project Site also is surrounded by 15 non-protected street trees, plus two sucker growth trees at the site of previous street trees. The sucker growth trees are not in the form of a street tree as one is low branching and the other is multi-branched. Furthermore, as they are sucker growth from the previous street trees, there is also a chance that should they grow larger, they could fail and cause injury. Both should not be considered street trees but were included for documentation because of the size of the trunks. The Project Site is currently zoned R4-1VL and C4-1VL and is located within the boundaries of the Hollywood Community Plan, which is one of the 35 Community Plans that form the Land Use Element of the General Plan for the City of Los Angeles.[2] The entire Project Site is designated as Neighborhood Office Commercial under the Hollywood Community Plan.[3] The Project Site is located in Height District No. 1VL that limits the height of development to 45 feet.[4] The Project Site is not located within the boundaries of or subject to any Specific Plan, Community Design Overlay, or Interim Control Ordinance.[5] The Project Site is located in Los Angeles state Enterprise Zone (ZI-2374), a Transit Priority Area (TPA) in the City of Los Angeles (ZI-2452), and Hollywood Redevelopment Project Area (ZI-2488).[6] The Project Site is also a Transit Oriented Community (Tier 3).[7] The Project Site is not located within a Bureau of Engineering-designated Special Grading Area, Historic Preservation Review or Overlay Zone, or a Clean Up-Green Up (CUGU) area. The Project Site is not located within a Very High Fire Severity Zone, Flood Zone, Watercourse, Hazardous Waste zone,

2 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5546014056, 5546014013, 5546014014, and 5546014017, http://zimas.lacity.org/, accessed June 27, 2022.

3 Ibid.

4 Ibid.

5 Ibid.

6 Ibid.

7 Ibid.

Preliminary Fault Rupture Study Area, a Tsunami Inundation Zone, Liquefaction zone, or Alquist-Priolo zone.[8] The Project Site is located within approximately 0.75 miles of the nearest fault, the Hollywood Fault.[9]

3.2.3 Surrounding Land Uses

The Project Site is located in an urban area characterized by low- to mid-rise buildings. The Project Site is bounded by West Santa Monica Boulevard and commercial uses to the south; North Saint Andrews Place, commercial uses, and a vacant lot to the east; North Wilton Place, residential uses and commercial uses to the west; and West Virginia Avenue and residential uses to the north.

Figures 3.3 and 3.4, *View of Surrounding Land Uses*, depict the existing conditions of the surrounding land uses. Surrounding land uses are comprised of commercial uses, residential uses, restaurant uses, and vacant lots. Nearby structures vary in building style and construction.

North: North of the Project Site, across West Virginia Avenue, are one-, two-, and three-story single and multifamily residential uses. The residential uses are zoned R3-1 with a General Plan land use designation of Medium Residential.

East: East of the Project Site, across North Saint Andrews Place, is the one-story Fiesta Mexicana restaurant, the one-story Swap Meet, the two-story Jaeil Pres. Korean Church and Youngs's Market, and a vacant lot. These commercial, restaurant and church uses are all zoned C4-1VL with a General Plan land use designation of Neighborhood Office Commercial. The vacant lot is zoned R4-1VL, with a General Plan land use designation of Neighborhood Office Commercial. Another vacant lot is located northeast of the Project Site, at the northeast corner of West Virginia Avenue and North Saint Andrews Place; this lot is zoned R4-1VL with a General Plan land use designation of Neighborhood Office Commercial.

South: South of the Project Site, across West Santa Monica Boulevard, is a mix of commercial and multifamily residential uses. All uses to the south are zoned C2-1D, with a General Plan land use designation of Highway Oriented Commercial.

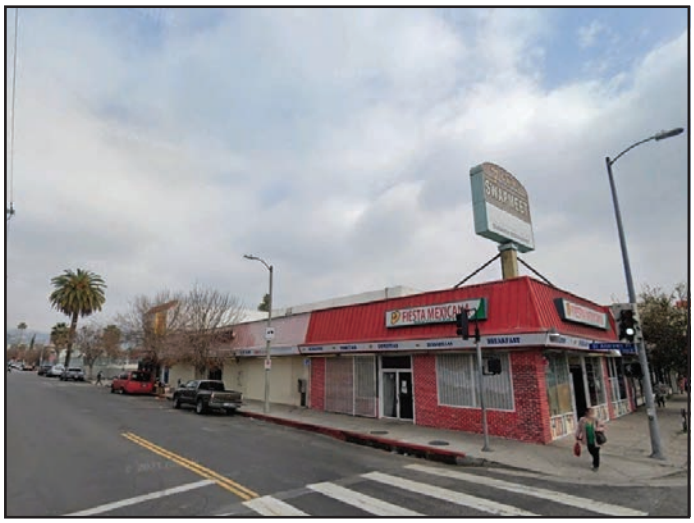
West: West of the Project Site, across North Wilton Place, are one- and two-story multifamily residential uses and a one-story commercial strip mall. The strip mall includes: Coin Laundry, Wilton Cleaners, a Dentist, and Tony's Liquor. The residential uses are zoned R3-1, with a General Plan land use designation of Medium Residential. The commercial strip mall is zone CM-1VL, with a General Plan land use designation of Commercial Manufacturing.

8 Ibid.

9 Ibid.

View 1: View to the north of the two-story residential uses.

View 2: View to the northwest of the one- and two-story residential uses.



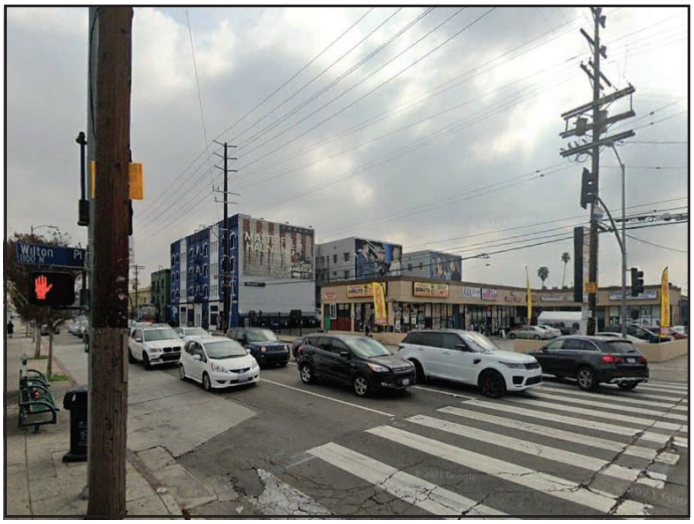
View 3: View to the east of the restaurant and commercial uses.

PHOTO LOCATION MAP

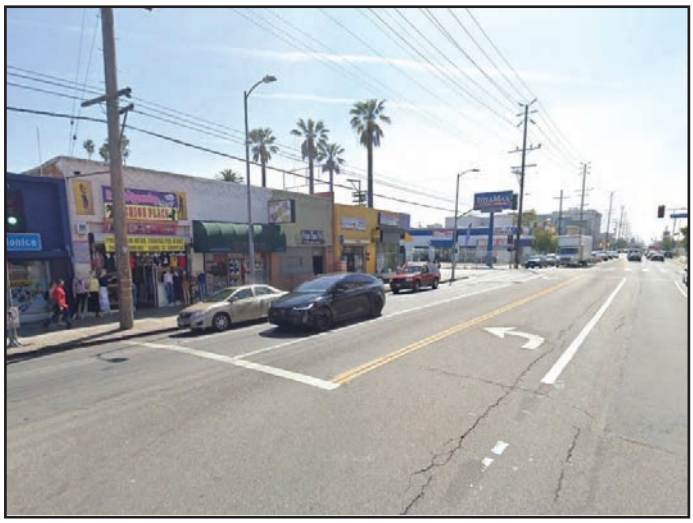
Source: EcoTierra and GoogleEarth, September 2021.

Figure 3.3
View of the Surrounding Land Uses
View 1, 2 and 3

View 4: View to the northwest of the commercial uses and residential uses.



View 5: View to the southeast of the commercial uses residential uses.



View 6: View to the southwest of the commercial uses.

PROJECT SITE

PHOTO LOCATION MAP

Source: EcoTierra and GoogleEarth, September 2021.

Figure 3.4
View of the Surrounding Land Uses
View 4, 5 and 6

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Project includes the construction of an approximately 510,621 square-foot studio campus building, as shown in Table 3.1, *Project Development Summary*. The existing surface parking lot and the former three-story retail building, originally constructed in 1928 and consisting of approximately 98,352 square feet, fronting West Santa Monica Boulevard would be demolished to allow for the location and construction of the new 510,621-square-foot studio campus building with a maximum height of 93 feet proposed as part of the Project. More specifically, the Project would consist of four sound stages and one flex stage flanked by two six-story creative office towers, and a raised campus/bungalow village. The proposed layout of the Project is illustrated in the floor plans in Figures 3.5 through 3.13. The elevation plans are shown in Figures 3.14 through 3.16.

Table 3.1
Project Development Summary[a]

Size	Total
Studio Project	
Office Use	*388,286 sf*
Restaurant Use	*12,378 sf*
Production Use	*91,870 sf*
Production Support Use	*18,087 sf*
Total Studio Project Square Footage	**510,621 sf**
Parking Spaces	
Subterranean Level 1	*355*
Subterranean Level 2	*626*
Total Parking Spaces	**981**
Bicycle Parking – Long-Term	*106*
Bicycle Parking – Short-Term	*56*
Total Bicycle Spaces	**162**
Lockers	
Lockers	162
Total Lockers	**162**
Showers	
Showers	5 Per Gender
Total Showers	**5 per Gender**
Open Space	
Open Space	*46,292 sf*
Total Open Space	***46,292 sf***
Landscaping	
Landscaping	*19,701 sf*
Total Landscaping	***19,701 sf***
Notes: *sf = square feet* *Source: House & Robertson Architects, July 1, 2022.*	

The Project would also include a two-level subterranean parking garage that would extend to a depth of approximately 30 to 40 feet below grade. Parking Level 1 includes 18,470 square feet of office uses, building management & engineering rooms, generators, mechanical rooms, electrical

and pump rooms, bicycle parking spaces, showers and lockers, vehicular parking spaces, and valet. Parking Level 2 is dedicated to vehicular parking spaces and two cisterns.

The proposed 510,621-square foot studio campus building would be situated above the subterranean parking garage and consists of six above-grade levels. The ground level of the studio campus building (see Figure 3.8, Floor Plan Level 1) would include an approximately 11,468-square-foot studio-supporting mill space, approximately 6,619 square feet of production office space, two lobby areas (one fronting North St. Andrews Place and the other fronting North Wilton Place) with a combined total of 15,109 square feet, 12,378 square feet of indoor and outdoor restaurant space, four sound stages each consisting of approximately 19,439 square feet for a combined total of 77,756 square feet, a flex stage consisting of approximately 14,113 square feet, and studio vehicle parking and loading (refer to Figure 3.5, Plot Plan). The second floor of the studio campus building includes a total of 52,246 square feet of office uses – one group of offices on the eastern side of the building and the other group of offices on the western side of the studio building (refer to Figure 3.9, Floor Plan Level 2). The third floor of the studio campus building includes a total of 100,674 square feet of office uses, including the office bungalows, and one 3,083-square-foot restaurant/cafeteria space (refer to Figure 3.10, Floor Plan Level 3). The fourth floor of the studio campus building includes a total of 84,718 square feet of office uses, including the office bungalows (Figure 3.11, Floor Plan Level 4). The fifth and sixth floors of the studio campus building include a total of 60,129 square feet and 56,930 square feet of office uses, respectively, in the eastern and western towers of the building (Figures 3.12, Floor Plan Level 5 and 3.13 Floor Plan Level 6).

Project Site improvements surrounding the building would include curb adjustments, and new sidewalks as required. The streetscape design would be required to be supportive of the street life characteristics of West Santa Monica Boulevard.[10] New street trees would be required to be provided in accordance with City recommendations.[11]

Zoning, Floor Area and Building Height

The Project Site is currently zoned R4-1VL and C4-1VL and is located within the Hollywood Community Plan Area. The R4-1VL zone indicates that a portion of the Project Site is located in a Multiple Dwelling zone (R4). R4 zoning allows for the development of R3 uses (apartments, multiple dwellings, and childcare) churches, schools, childcare, and homeless shelters. The C4-1VL zone indicates that a portion of the Project Site is located in the Commercial zone (C4). C4 zoning allows for the development of C2 uses with limitations (retail with limited manufacturing, service stations and garages, retail business, churches, schools, and auto sales), and R4 uses. The Project Site is located in Height District No. Very Low Height District (1VL). Height District 1VL limits the height to 45 feet in both the R4 and C4 zones.

10 Citywide Design Guidelines, adopted October 24, 2019.

11 City of Los Angeles Ordinance No. 186,873, https://streetsla.lacity.org/sites/default/files/protected_tree_ordinance.pdf, accessed October 2022.

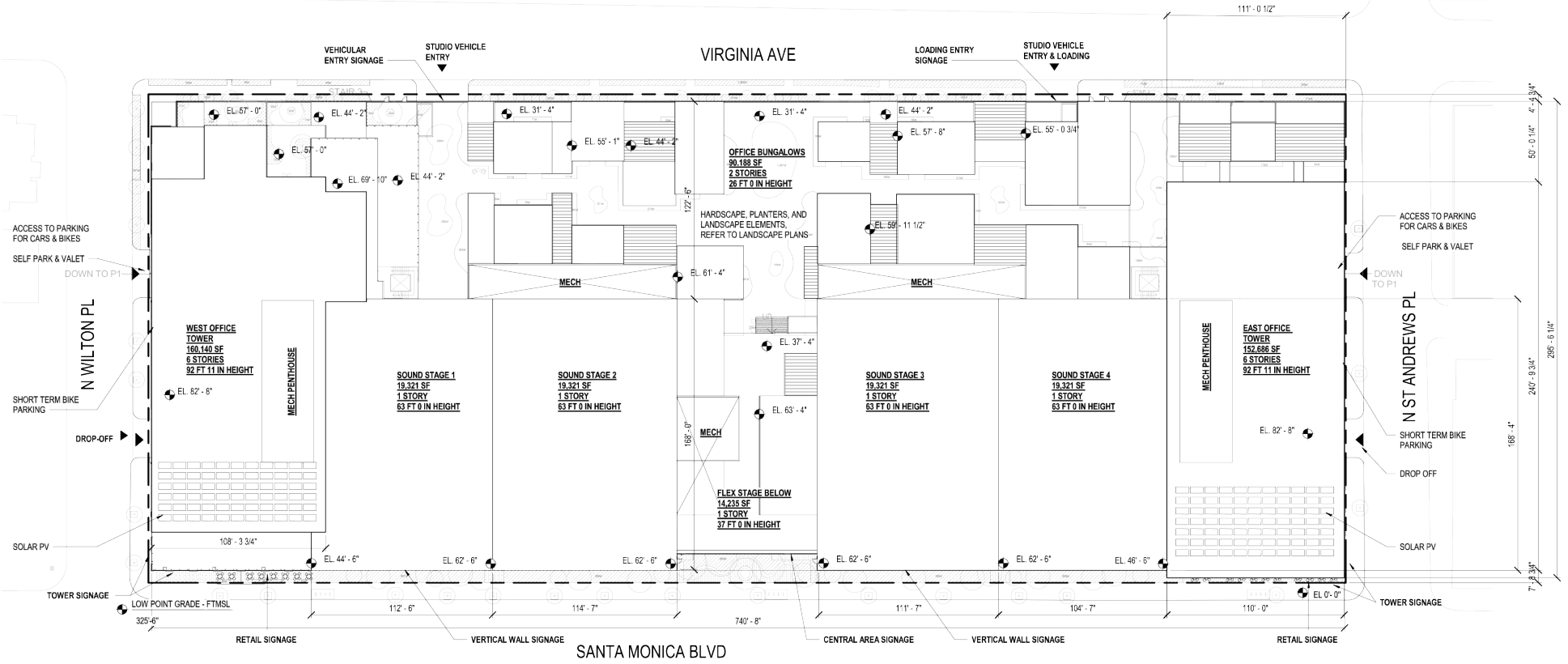
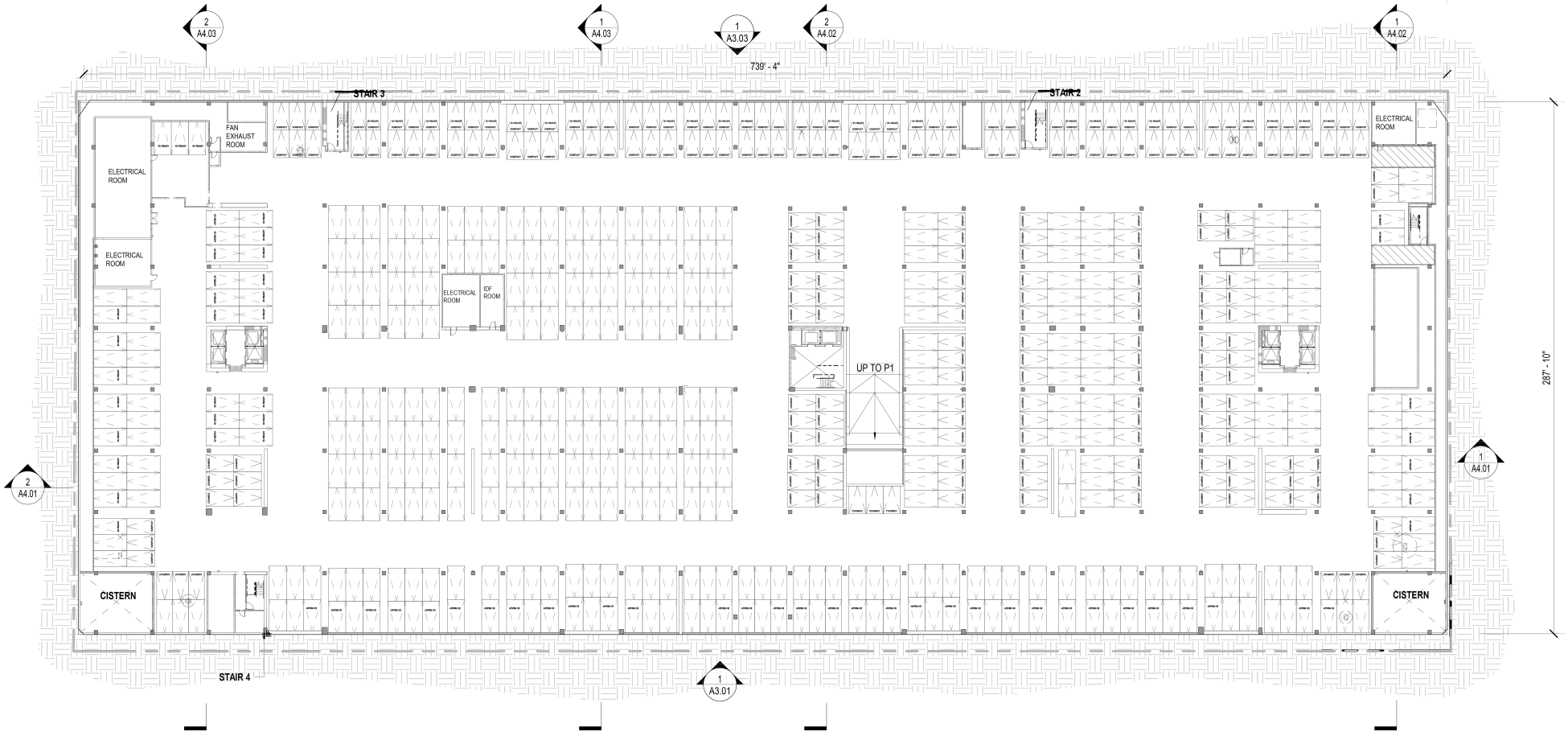
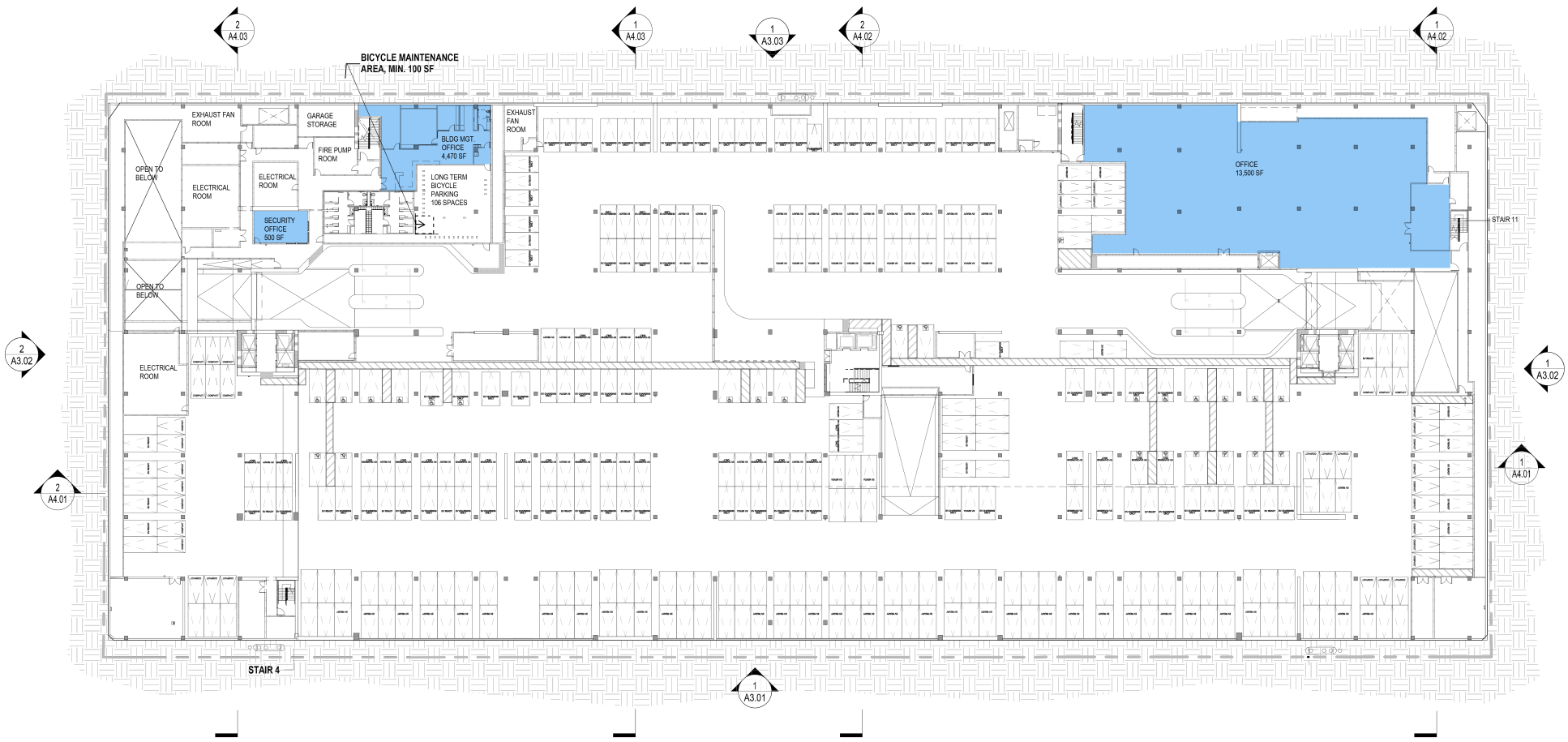


Figure 3.5
Conceptual Plot Plan



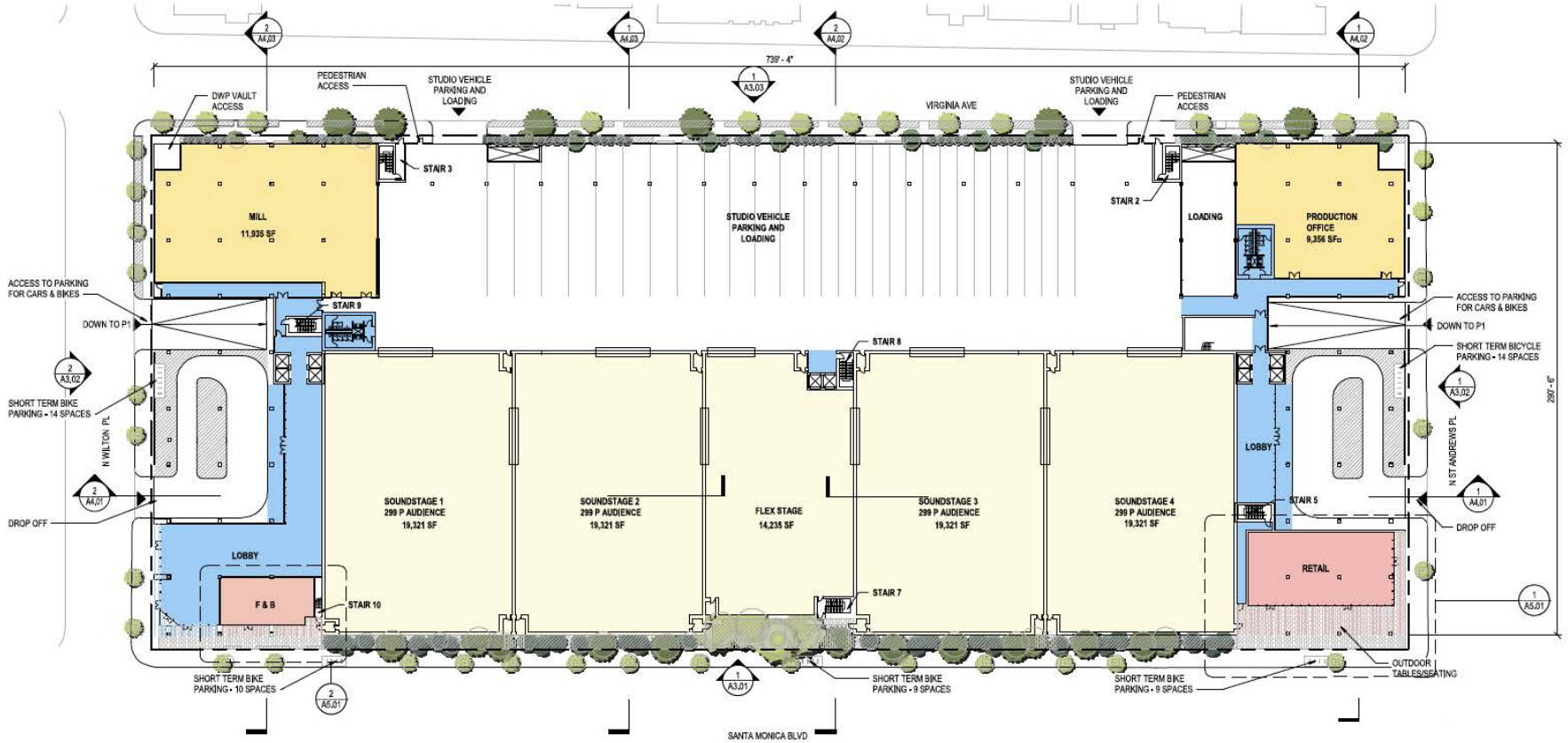
Source: House & Robertson Architects, May 2021.

Figure 3.6
Subterranean Parking Level 2



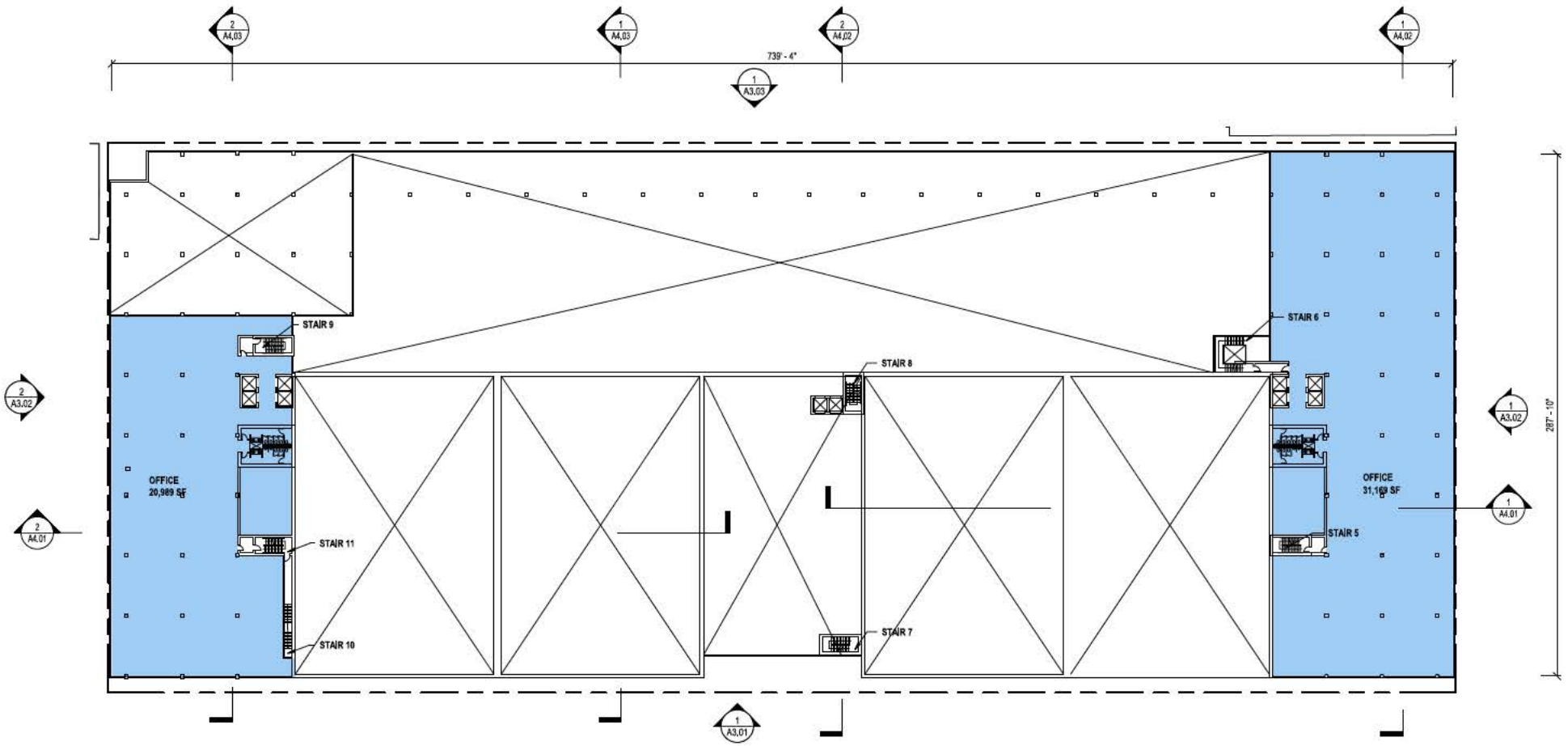
Source: House & Robertson Architects, May 2021.

Figure 3.7
Subterranean Parking Level 1



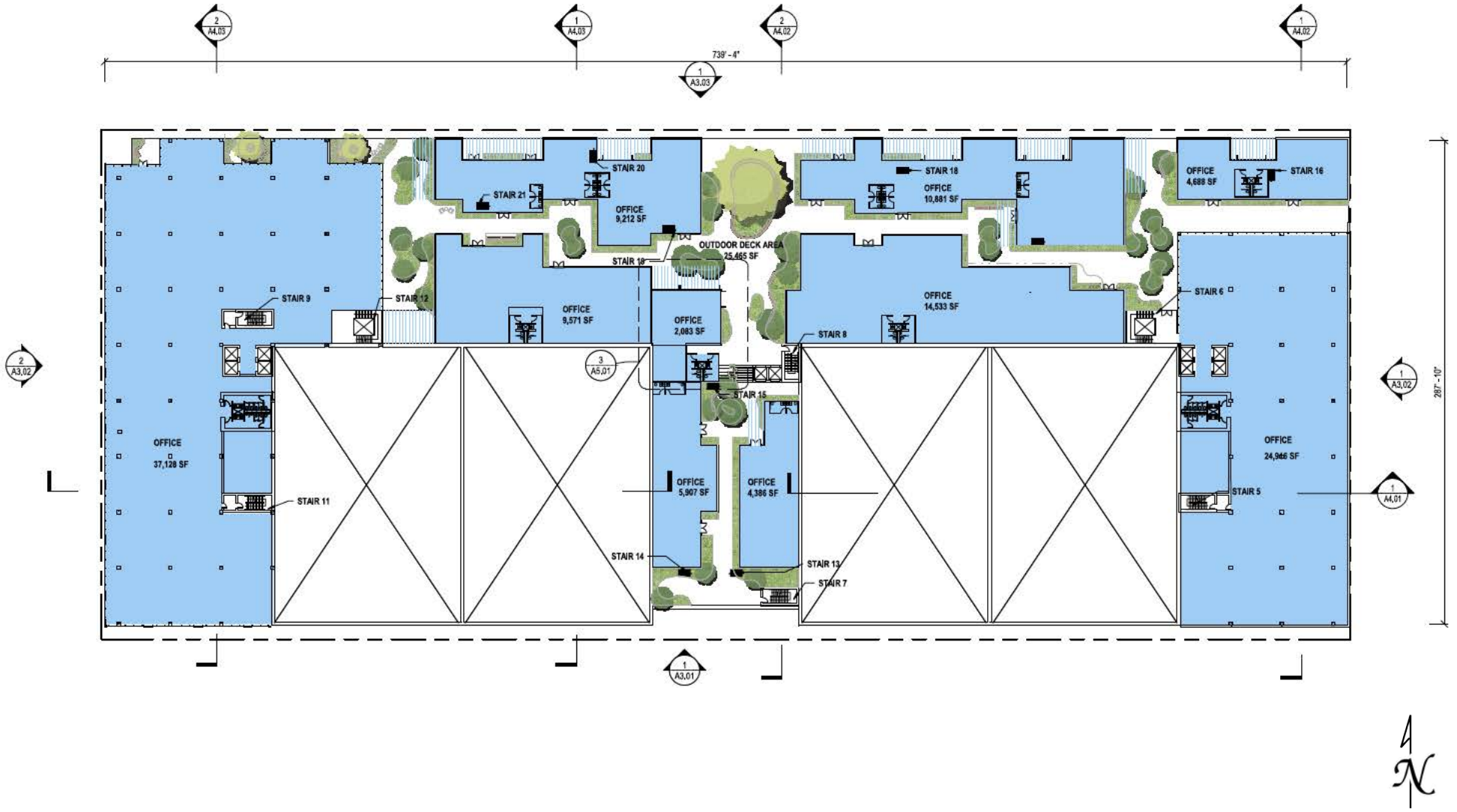
Source: House & Robertson Architects, May 2021.

Figure 3.8
Floor Plan Level 1



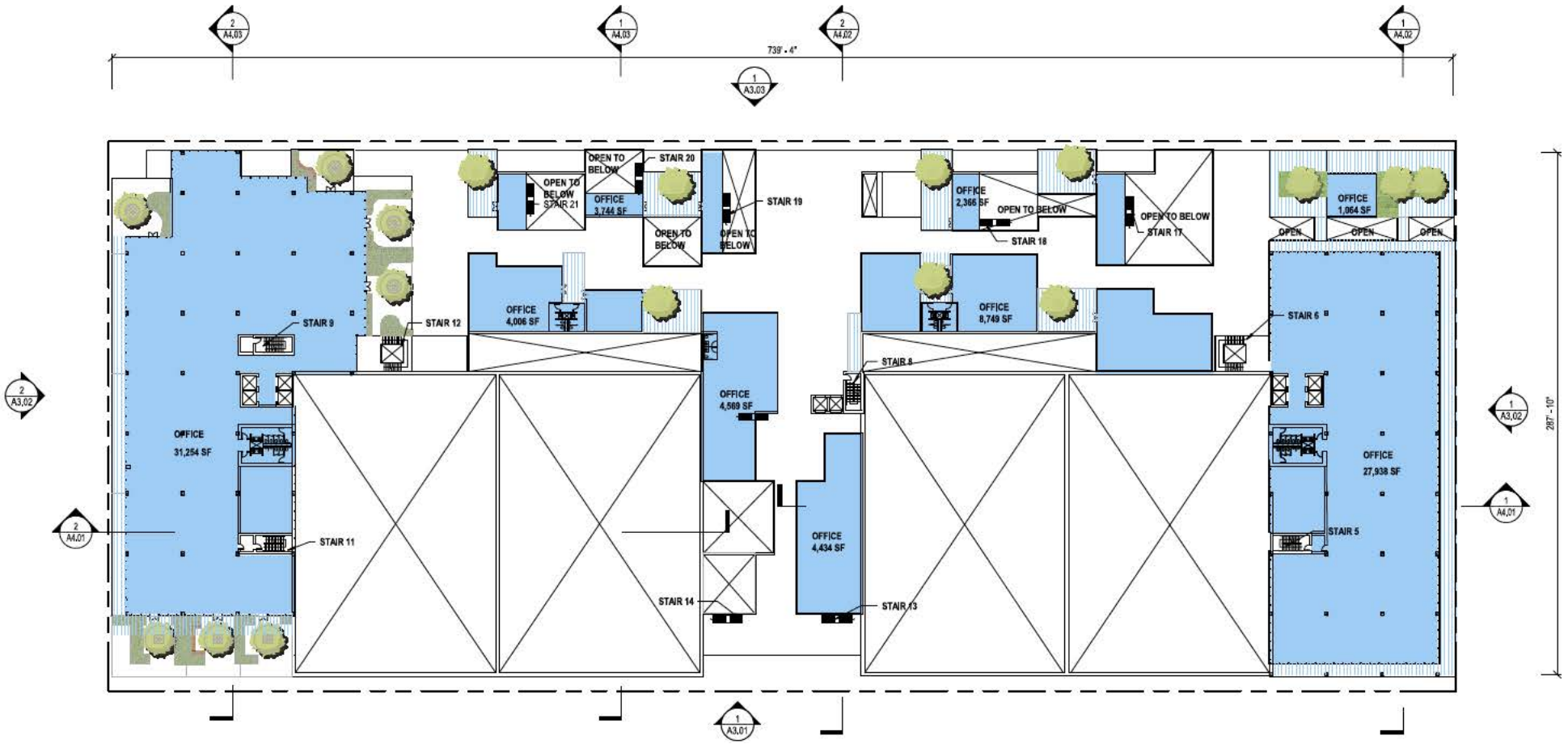
Source: House & Robertson Architects, May 2021.

Figure 3.9
Floor Plan Level 2



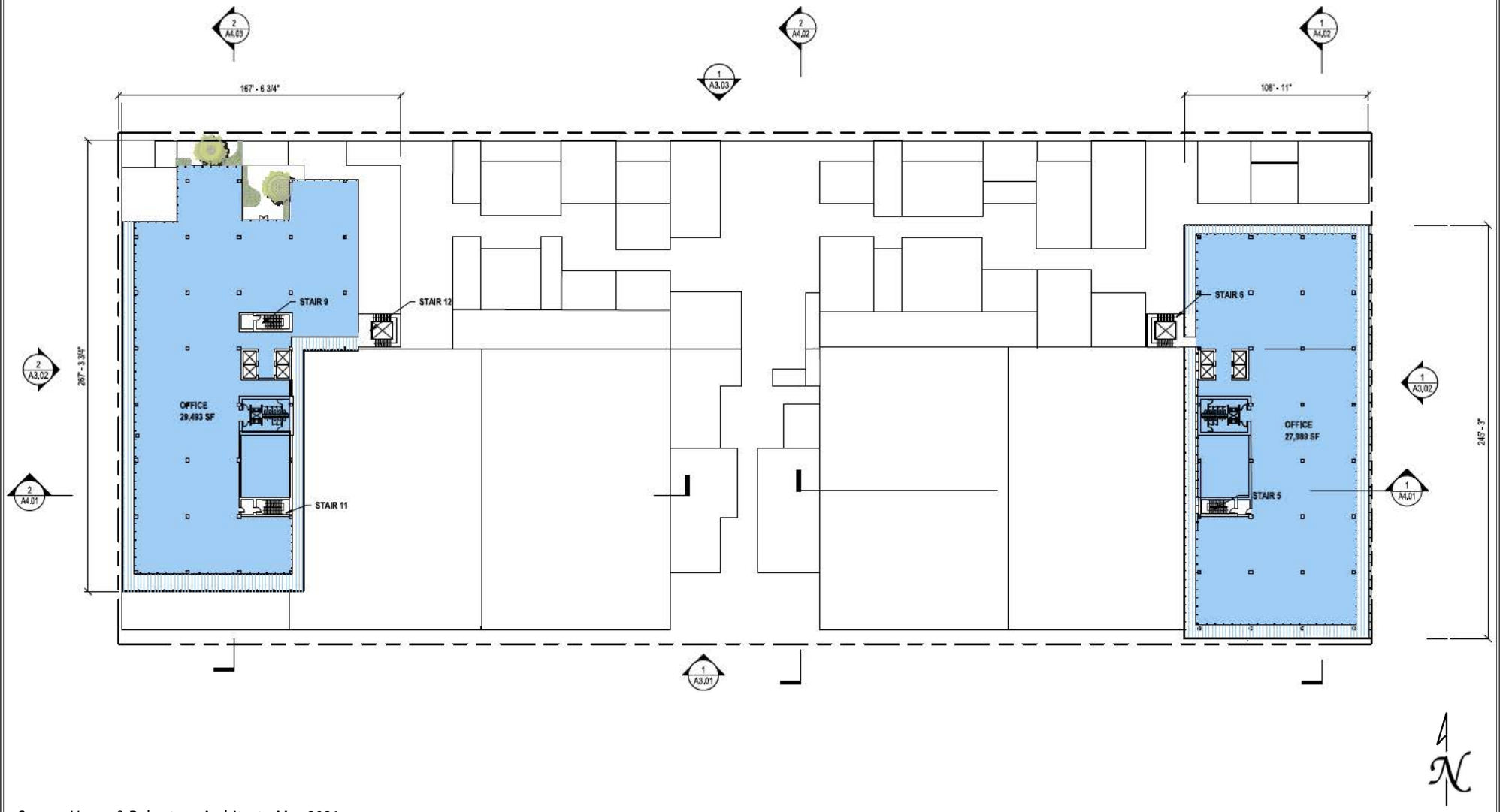
Source: House & Robertson Architects, May 2021.

Figure 3.10
Floor Plan Level 3



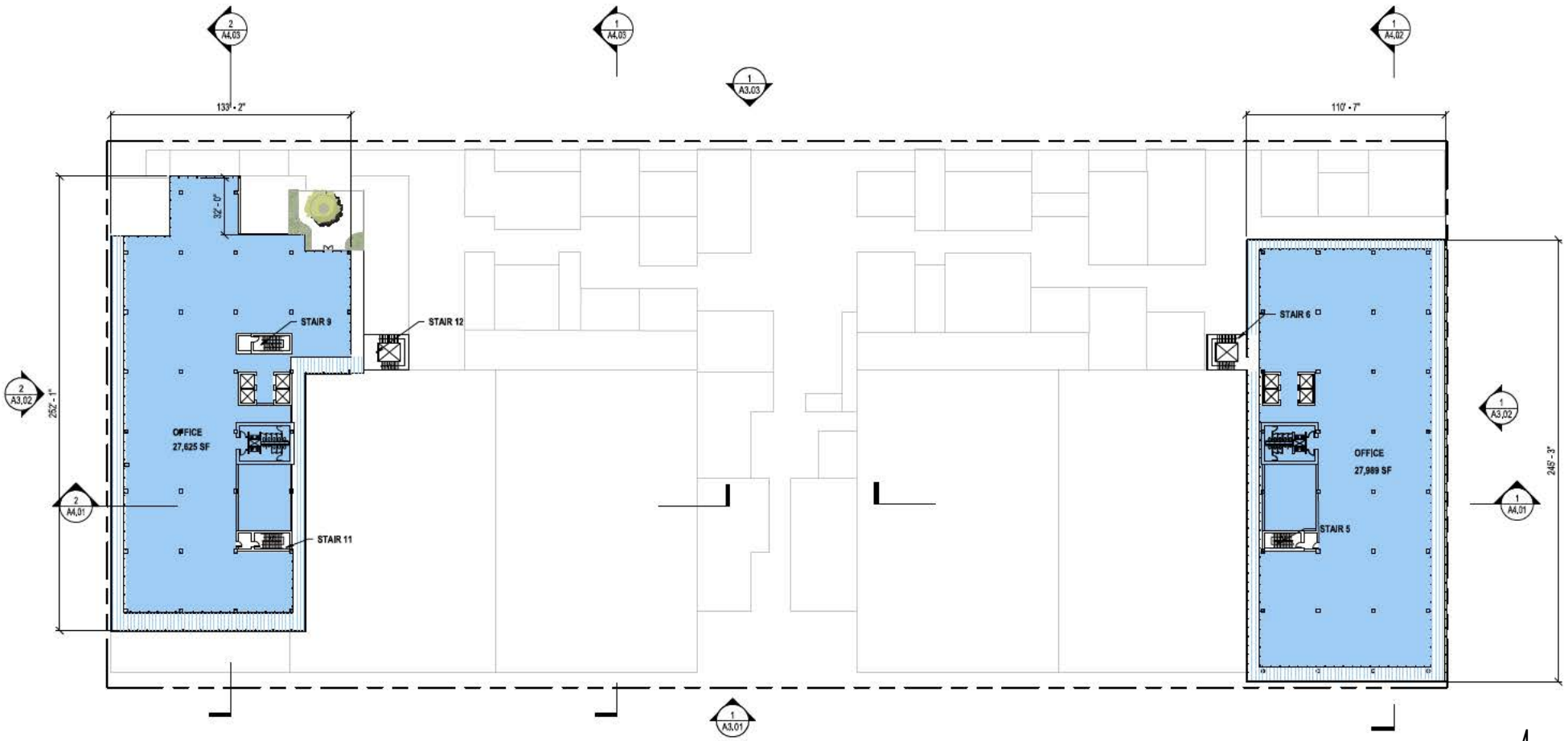
Source: House & Robertson Architects, May 2021.

Figure 3.11
Floor Plan Level 4



Source: House & Robertson Architects, May 2021.

Figure 3.12
Floor Plan Level 5



Source: House & Robertson Architects, May 2021.

Figure 3.13
Floor Plan Level 6

Source: House & Robertson Architects, May 2021.

Figure 3.14
Elevations East and West

Source: House & Robertson Architects, May 2021.

Figure 3.15
Elevation North

Source: House & Robertson Architects, July 2022.

Figure 3.16
Elevation South

The Applicant has requested a Zone and Height District change from R4-1VL and C4-1VL to C4-2D, which would allow the Project to be developed with a FAR up to 2.26:1 and to a maximum height of 93 feet and six stories.

3.3.2 Design and Architecture

The building design would include the use of modern materials. The Project's façade would incorporate a variety of materials to break its solid walls and provide visual interest, including: textured plaster finish, fiber cement board siding, perforated metal screen, standing seam rain screen cladding, and glass. The architectural features of the building would also include: window wall systems, curtain wall systems, an art wall, planted green wall, cable green wall, metal louvers, and integrated and affixed signage.

At its maximum height of 93 feet at the roof parapet, the proposed building would be taller than the other building heights in the immediate vicinity of the Project Site; however, the proposed design would be compatible with the design elements of surrounding production studio buildings in the Hollywood area, especially those with similar use. The north elevation would terrace down to reduce the building's massing along the neighboring residential lots, as shown in Figures 3.14 and 3.16. There is a ground level parking lot proposed on-site that will be enclosed by solid roll down doors and a solid, insulated plaster stud frame wall that blocks the view of on-site activities from the nearby residential uses and would reduce the noise levels at the residential uses at the north side of West Virginia Avenue.

3.3.3 Open Space and Landscaping

Additional improvements to the Project Site would include planting at grade along the facades of the building along the surrounding streets, as well as on the upper-level terraces near the office bungalows, and in the plaza between the bungalows.

Currently, the Project Site is surrounded by 15 non-protected street trees, plus two sucker growth trees at the site of previous street trees. The sucker growth trees are not in the form of a street tree as one is low branching and the other is multi-branched. Furthermore, as they are sucker growth from the previous street trees, there is also a chance that should they grow larger, they could fail and cause injury. Both should not be considered street trees but were included for documentation because of the size of the trunks. The Project would require the removal of all 15 existing street trees for proposed driveways and street improvements. There are no protected species or heritage trees on the Project Site or in the adjacent public right-of-way. Pursuant to City of Los Angeles Ordinance No. 186,873 the existing trees would be replaced at a ratio of 2:1 with a minimum 24-inch box replacement tree.[12] Thus, the Project would require 30 replacement street trees. The Project has proposed 42 new street trees. In total, the Project would provide a minimum of 42 street trees, and 108 on-site trees (55 trees at ground level, 33 trees on Floor Level 3, 17 trees on Floor Level 4, 2 trees on Floor Level 5 and 1 tree on Floor Level 6), and 19,701 square feet of landscaping. Landscaping would be added surrounding the perimeter

12 City of Los Angeles Ordinance No. 186,873, https://streetsla.lacity.org/sites/default/files/protected_tree_ordinance.pdf, accessed October 2022.

streets, between the raised office bungalows, and at the North Saint Andrews Place and North Wilton Place entrances.

A waiver of dedication and improvements is requested for Santa Monica Boulevard with request to retain existing uniform street frontages, unlikely neighboring dedication and improvements and avoidance of creating hazards. If the waiver of dedications is not granted then 7 street trees on Santa Monica Boulevard would need to be removed.

There are no proposed right-of-way improvements other than what are required by the City. In addition, no street trees would be removed without prior approval of Urban Forestry based on compliance with LAMC Sections 62.169 and 62.170 and applicable findings.

Since the Project does not propose any residential uses, no LAMC code-required open space, or recreational space would be required. Notwithstanding, the Project would provide 46,292 square feet of non-required private and common open space for the proposed office and studio tenants. This open space would include private terraces, common terraces, seating areas, and landscaping.

3.3.4 Access, Circulation, and Parking

Vehicular and bicycle access to the Project Site would be provided via two-way entry/exit driveways on North Wilton Place and North Saint Andrews Place. The driveways would allow access to both self-parking and the valet within the subterranean parking garage. The Project would also include two at-grade on-site drop-off areas to serve both rideshare arrivals and departures located on North Wilton Place and North Saint Andrews Place. Two studio vehicle and loading entry driveways that lead to a studio vehicle parking and loading area recessed within the building footprint would be provided on West Virginia Avenue.

As described above, parking for the proposed studio campus building would be provided in a two-level below-grade parking structure accessed by internal vehicle ramps. As shown in Table 3.2, *Summary of Required and Proposed Vehicular Parking Spaces*, the Project would be required to provide a total of 981 vehicular parking spaces. The Project would provide 981 vehicular parking spaces, located and configured in compliance with applicable requirements of the LAMC. Of the 981 parking spaces, a total of 20 spaces would be American Disability Act-compliant, 196 spaces would be electric vehicle (EV) ready and 99 would be equipped with EV charging stations.

Table 3.2
Summary of Required and Proposed Vehicular Parking Spaces

Description	Quantity	Rate	Spaces
Required[a]			
Commercial Uses	*510,621 sf*	*2 per 1,000 sf*	*1,021*
Bicycle Parking Reduction	*160 bicycles*	*-1 space per 4 bicycles*	*-40*
		Required Total	**981**
Proposed			
Subterranean Level 1			*355*
Subterranean Level 2			*626*
		Proposed Total	**981**
Notes: *sf = square feet*			

Table 3.2
Summary of Required and Proposed Vehicular Parking Spaces

Description	Quantity	Rate	Spaces
Required[a]			

[a] *Pursuant to LAMC Section 12.21-A,4(x)(3)2 and 6.*
Source: House & Robertson Architects July 1, 2022.

As shown in Table 3.3, *Summary of Required Bicycle Parking Spaces*, the Project is required to provide 162 bicycle parking spaces. As shown in Table 3.3, *Summary of Proposed Bicycle Parking Spaces,* the Project would provide 56 short-term bicycle parking spaces and 106 long-term bicycle parking spaces, located and configured in compliance with applicable requirements of the LAMC. Ten showers, and a total of 162 lockers, would be provided in the first level of the below-grade parking facility.

Table 3.3
Summary of Required and Proposed Bicycle Parking Spaces

Use	Quantity	Long-Term Rate	Long-Term Spaces	Short-Term Rate	Short-Term Spaces
Required[a]					
Office/Studio	*498,243 sf*	*1 per 5,000 sf*	*100*	*1 per 10,000 sf*	*50*
Restaurant/Retail	*12,378 sf*	*1 per 2,000 sf*	*6*	*1 per 2,000 sf*	*6*
			106		*56*
				Required Total	**162**
Proposed					
Office/Studio	*498,243 sf*	*1 per 5,000 sf*	*100*	*1 per 10,000 sf*	*50*
Restaurant	*12,378 sf*	*1 per 2,000 sf*	*6*	*1 per 2,000 sf*	*6*
			106		*56*
				Proposed Total	**162**

Notes:
sf = square feet
[a] *Pursuant to LAMC Section 12.21-A,16(a)(2).*
Source: House & Robertson July 1, 2022.

3.3.5 Lighting and Signage

All exterior lighting would meet all applicable LAMC standards and be shielded or directed toward the areas to be illuminated. The exterior lighting would include soffit downlights in the ground floor covered area, as well as low-level landscape lighting and limited façade up-lighting to highlight key architectural features. In compliance with all applicable LAMC standards, exterior lighting on the Project Site would not illuminate adjacent properties.

No signage, other than wayfinding and directional signage and associated lighting inside the Project Site, has been proposed for the Project at this time. Any signage, if proposed, would either meet code requirements or would be proposed under a subsequent filing.

3.3.6 Site Security

During construction, the Project Site would be secured with perimeter fencing. During Project operations, security would be provided via site planning and secured access points of entry. In addition, the Project would include security cameras, security lighting, as well as a well-illuminated

public and semi-public space designed with a minimum of dead space to eliminate areas of concealment.

3.3.7 Sustainability Features

The Project would comply with the 2020 Los Angeles Green Building Code (LAGBC), which requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. LAGBC contains both mandatory and voluntary green building measures to conserve energy.

The Project would enhance its energy-efficiency via high-performance glazing as well as enhanced façade, roof and deck insulation values. The air conditioning system would be comprised of highly efficient Variable Refrigerant Flow (VRF) systems allowing for minimal electrical consumption, particularly when the building is lightly occupied. The building systems would increase the filtration of outside air being delivered to the occupied areas, and operable windows and large expanses of sliding glass doors would improve the natural ventilation whenever weather conditions permit. The glazing features would also promote daylight and access to quality views, both of which are essential for occupant wellness and productivity. The tower roofs would be engineered with appropriate structural loads and provided with infrastructure to accommodate potential large solar photovoltaic arrays to generate electricity on-site through a renewable source.

Indoor water usage would be minimized via the use of ultra-low flow plumbing fixtures installed throughout the Project. All drains would feed into four separate rainwater harvesting cisterns located on Parking Level 2 and 3. Their approximately 10,000-gallon capacity is to be used entirely for irrigation of the on-site landscaping.

The irrigation system would be designed to meet or exceed the state Model Water Efficient Landscape Ordinance (MWELO).[13] The irrigation system would utilize a dedicated landscape water meter and automatic weather-based controllers with electronically operated control valves and seasonal irrigation schedules. All areas would include high efficiency irrigation emitters, including micro spray and drip irrigation. Bubblers may be used for trees or shrubs where drip irrigation is not feasible. Irrigation valves would be located in inconspicuous areas, and would be parallel to adjacent structures and paving, with quick coupling valves spaced a minimum 100 feet on center.

The on-site drop-off areas on the ground floor would encourage ridesharing and carpooling, and the on-site parking would provide preferential parking for electric and low-emitting vehicles. The Project would also meet or exceed the number of code-required electric vehicle charging stations. The Project's development on a Project Site situated in an infill location would promote the policy of concentrating development in an urban location with extensive existing infrastructure and access to diverse uses and public transit facilities, to promote multi-modal travel and reduce vehicle miles traveled for the office space. As further described in the Energy Use Analysis section

13 California Department of Water Resources, Model Water Efficient Landscape Ordinance, https://water.ca.gov/Programs/Water-Use-And-Efficiency/Urban-Water-Use-Efficiency/Model-Water-Efficient-Landscape-Ordinance, accessed October 2022.

in the IS/MND, below, compliance with Title 24 of the California Administrative Code and the L.A. Green Building Code would reduce the Project's energy consumption.

On-site bicycle parking facilities would meet or exceed requirements required per LAMC 12.21, and encourage bicycle use over vehicle travel.

3.3.8 Anticipated Construction Schedule

For purposes of analyzing impacts associated with air quality, this analysis assumes a Project construction schedule of approximately 25 months, with construction beginning in 2023 and final buildout occurring in 2025.[14] Construction activities would be undertaken in four main phases: (1) demolition; (2) grading, excavation, and foundations; (3) building construction; and (4) finishing and architectural coatings. Construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies. As provided in Section 41.40 of the LAMC, the permissible hours of construction within the City are 7:00 A.M. to 9:00 P.M. on Monday through Friday, and between 8:00 A.M. and 6:00 P.M on any Saturday or national holiday. No construction activities are permitted on Sundays.

Temporary shoring with tie backs or rakers would be used for excavation of the subterranean parking garage to a depth of approximately 30 to 40 feet. It is anticipated that temporary shoring with temporary tie backs will be used along West Virginia Avenue, North Saint Andrews Place, North Wilton Place, and West Santa Monica Boulevard during the excavation process. Approximately 251,000 cubic yards (cy) of soil would be excavated and removed from the Project Site, which would require approximately 17,929 haul truck round trips (assuming 14 cy/load) for export.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. This IS/MND assesses the potential environmental impacts associated with the Project and provides 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:

- **Zone Change and Height District Change.** Pursuant to LAMC Section 12.32, the Applicant seeks Zone Change and Height District Change and as follows:
  - From R4-1VL and C4-1VL to C4-2D,
- **Site Plan Review**,
- **Vesting Tentative Tract Map**, including a waiver of dedication and street widening requirements,

[14] The buildout year for the Project in the analysis is 2025. However, there is a potential for construction delays which could push the operational year of the Project to 2026. Although there could potentially be a change in the operational year, the current analysis using the 2025 operational year is worst-case scenario analysis for the Project as the emissions become cleaner as time progresses due to regulation and advances in technology.

- **Main Conditional Use Permit for Alcohol**,
- A waiver of dedication and improvements is requested for Santa Monica Boulevard with request to retain existing uniform street frontages, unlikely neighboring dedication and improvements and avoidance of creating hazards. If the waiver of dedications is not granted then 7 street trees on Santa Monica Boulevard would need to be removed, and
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, haul route approval, temporary street closure permits, demolition permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

3.5 RESPONSIBLE PUBLIC AGENCIES

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

- No responsible agencies have been identified for this Project.

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

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

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA."[15]

PRC Section 21099 applies to the Project. Therefore, the Project is exempt from aesthetic impacts. The 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. Any 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 shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures

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

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

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

Less Than Significant Impact. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest). Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on a scenic vista is made considering the following factors:

- The nature and quality of recognized or valued views (such as natural topography, settings, man-made or natural features of visual interest, and resources such as mountains or ocean);
- Whether a project affects views from a designated scenic highway, corridor, or parkway;
- The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment); and
- The extent to which a project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.

With regard to panoramic views, valued visual resources in the vicinity of the Project Site include the Hollywood Hills and the Hollywood Sign, City-designated Historic-Cultural Monument No. 111, to the distant north. Adjacent to the Project Site, views of the Hollywood Hills and the Hollywood Sign are available from West Santa Monica Boulevard looking north from north-south streets. Specifically, views of the Hollywood Hills and the Hollywood Sign are available from along Wilcox Avenue west of the Project Site and along North St. Andrews Place east of the Project Site. As discussed in Section 3, Project Description, of this IS/MND, the Project Site is bound by West Santa Monica Boulevard to the south, Wilcox Avenue to the west, North Saint Andrews Place to the east, and West Virginia Avenue to the north.

The Project would replace the existing three-story Sears building and surface parking lot within the Project Site with a new six-story commercial building. Therefore, the Project could potentially block existing views of the Hollywood Hills and Hollywood Sign available along West Santa Monica Boulevard when looking north through the Project Site. However, in the vicinity of the Project Site, views would continue to be available on an intermittent basis along roadway segments, particularly north-south roadways. In particular, the Project would not block existing public views of the distant Hollywood Hills or Hollywood Sign from Wilcox Avenue or North St. Andrews Place because the existing views are oriented north-south and the Project Site is an infill location between these north-south streets. Therefore, while the Project would obstruct some partial and distant views of the Hollywood Hills and Hollywood Sign, such blockage would occur on an intermittent basis at single, fixed vantage points, rather than resulting in substantial blockages across long distances, such as along the length of a public roadway. Furthermore, a myriad of other views of the Hollywood Hills and Hollywood Sign at various degrees would continue to be available throughout the greater Hollywood neighborhood. Therefore, the reduction in publicly-available intermittent views of the Hollywood Hills and the Hollywood Sign that would result from the Project would not be considered a substantial obstruction of existing views of these visual resources.

Overall, as the area is fully developed and highly urbanized, and 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 would be less than significant and no mitigation measures are required.**

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

Less Than Significant Impact. The Project Site does not contain trees with scenic significance or rock outcroppings and is not located within a state scenic highway. The nearest officially eligible state scenic highway is along the Foothill Freeway (I-210), approximately 14 miles northeast of the Project Site,[16] and the nearest City-designated scenic highway is along Mulholland Drive,

16 California Department of Transportation, Scenic Highways, https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed March 21, 2022.

approximately 7 miles northwest of the Project Site.[17] In addition, as discussed in detail in response to Checklist Question No. V.a, below, there are historic resources located in the vicinity of the Project Site. These include: (1) 1022 North Van Ness Avenue/Santa Monica Boulevard Elementary School, listed in the California Register; (2) 5622 West Santa Monica Boulevard/a potentially eligible two-story commercial building; (3) 5638 West Santa Monica Boulevard/a potentially eligible four-story apartment building; (4) 5517-5519 West Sierra Vista Avenue/a potentially eligible Sierra Vista Avenue Bungalow Court; (5) 5511 West Sierra Vista Avenue/a potentially eligible single-family residence; and (6) 5623 West Virginia Avenue/a potentially eligible single-family residence. Because the Project would be developed across the street or farther from each of these resources, it would not substantially affect the primary public views of any of them, and the views of these resources would primarily remain unchanged by the Project. Therefore, the Project would not substantially damage scenic resources within a state- or City-designated scenic highway as no scenic highways are located adjacent to the Project Site. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impact would not be considered a significant impact on the environment. **Therefore, impacts would be less than significant and no mitigation measures are required.**

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

Less Than Significant Impact. The Project is located in a highly urbanized area in the Hollywood community of the City of Los Angeles; therefore, the applicable threshold with respect to the Project is consistency with applicable zoning and other regulations governing scenic quality.

The Project would involve the demolition of the existing three-story retail building and surface parking lot, and the construction of an approximately 93-foot tall, 510,621-square-foot studio and creative office building. Thus, the Project would result in a change in the visual character of the Project Site.

Furthermore, the Project Site is currently zoned R4-1VL and C4-1VL, and is located within the Hollywood Community Plan Area. The R4-1VL zone designates the Project Site as a Multiple Dwelling zone (R4). R4 zoning allows for the development of R3 uses (apartments, multiple dwellings, and childcare) churches, schools, childcare, and homeless shelters. The C4-1VL zone designates the Project Site as Commercial zone (C4). C4 zoning allows for the development of C2 uses with limitations (retail with limited manufacturing, service stations and garages, retail business, churches, schools, and auto sales), and R4 uses. The Project Site is located in Height District No. 1 Very Low Height District (1VL). Height District 1VL limits the height to 45 feet in both the R4 and C4 zones. The Applicant has requested a Zone and Height District Change from R4-1VL and C4-1VL to C4-2D which would allow the Project to be developed with a FAR up to 2.26:1 and to a maximum height of 93 feet and six stories.

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

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

Citywide General Plan Framework Element

The Framework Element provides direction regarding the City's vision for future development in the City and includes an Urban Form and Neighborhood Design chapter to guide the design of future development. One of the key objectives of the Urban Form and Neighborhood Design Chapter is to enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm (Objective 5.5). As described in Section 3, Project Description, of this IS/MND, the Project Site is currently improved with a surface parking lot and the former three-story, 98,352-square-foot Sears building originally constructed in 1928. The area surrounding the Project Site is developed primarily with a mix of low to mid rise buildings. Surrounding land uses are comprised of commercial uses, residential uses, restaurant uses, and a vacant lot. Nearby structures vary in building style and period construction.

At its maximum height of 93 feet at the roof parapet, the proposed building would be taller than the other building heights in the vicinity; however, the proposed design is compatible with the design elements of surrounding production studio buildings in the Hollywood area, especially those with similar use. Specifically, the Project would complement the surrounding buildings by orienting bungalow offices toward residential uses to the north of the Project Site, and orienting soundstages to the south of the Project Site along West Santa Monica Boulevard. Office uses would be located along the east and west side of the Project Site, visually anchoring the Project. Thus, creating a visual terraced stepping down view from West Virginia Avenue of the building, with bungalows, landscaped courtyards. Further reducing the buildings massing along the neighboring residential lots. Specifically, the proposed building would be designed in a contemporary architectural style that would be compatible with the general urban characteristics of the surrounding neighborhood. The proposed commercial building would be moderated by a high degree of articulation, using both variations in building planes and façade setbacks, as well as a variety of materials, and would be designed to complement the surrounding neighborhood.

Another of the key objectives of the Urban Form and Neighborhood Design Chapter is to encourage proper design and effective use of the built environment to help increase personal safety at all times of the day (Objective 5.9). As described in Section 3, Project Description, of this IS/MND all exterior lighting would include soffit downlights in the ground floor covered area, as well as low-level landscape lighting and limited façade up-lighting to highlight key architectural features. Furthermore, during construction, the Project Site would be secured with perimeter fencing. During Project operations, security would be provided via site planning and secured access points of entry. In addition, the Project would include security cameras and security lighting. Thus increasing the personal safety in the surrounding area through specific lighting and security design features.

Policy 5.9.1 of the Urban Form and Neighborhood Design Chapter is to facilitate observation and natural surveillance through improved development standards which provide for common areas, adequate lighting, clear definition of outdoor spaces, attractive fencing, use of landscaping as a natural barrier, secure storage areas, good visual connections between residential, commercial, or public environments and grouping activity functions such as child care or recreation areas. The Project would support this policy by providing new development to the area that would enhance the security of the area and provide improvements to the Project Site include planting at grade along the facades on the surrounding streets, as well as on the upper-level terraces near the office bungalows, and in the plaza between the bungalows. Thus, improving development standards between the Project and the neighboring residential uses.

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.

City Walkability Checklist

As it relates to the scenic quality, the City Walkability Checklist includes the following objective applicable to the Project:

- Use the design of visible building facades to create/reinforce
    - Incorporate features on the building facade that add visual interest to the environment.
    - Create compatibility between buildings, street, and neighborhood through architectural elements that add scale and character.
    - Provide views beyond the street wall to enhance the public's visual environment.
    - Use views beyond the street wall to enhance the public's visual environment.

The Project would support this policy by providing new planting at grade along the facades on the surrounding streets, as well as on the upper-level terraces near the office bungalows, and in the plaza between the bungalows. These new plantings and the addition of terraces would add visual interest to the environment, would step back the massing and scale of the building near the neighboring residential uses, and would provide view beyond the street wall. Thus, improving the pedestrian environment between the Project and the neighboring residential uses.

Hollywood Community Plan

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

- Parking areas should be located between commercial and residential uses on the commercially-zoned properties where appropriate to provide a buffer, and shall be separated from residential uses by means of at least a solid masonry wall and landscaped setback.

Vehicular and bicycle access to the Project Site would be provided via two-way entry/exit driveways on North Wilton Place and North Saint Andrews Place. The driveways would allow access to both self-parking and valet within the subterranean parking garage. The Project would also include two at-grade on-site drop-off areas to serve both rideshare arrivals/departures located on North Wilton Place and North Saint Andrews Place. Two studio vehicle and loading entry driveways that lead to studio vehicle parking and loading area recessed within the building footprint would be provided on West Virginia Avenue.

Parking for the proposed studio campus building would be provided in a two-level below grade parking structure accessed by internal vehicle ramps. As shown in Table 3.2, *Summary of Required and Proposed Vehicular Parking Spaces*, the Project is required to provide a total of 981 vehicular parking spaces. The Project would provide 981 vehicular parking spaces, located and configured in compliance with applicable requirements of the LAMC. Of the 981 parking spaces, a total of 20 spaces would be American Disability Act-compliant, 196 spaces would be electric vehicle (EV) ready and 99 would be equipped with EV charging stations.

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

The utility line on North St. Andrews Place would remain as is, an above ground utility line. No new power lines are proposed; therefore, the Project would not conflict with the Hollywood Community Plan objective and policy related to scenic quality.

Hollywood Redevelopment Plan

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

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

As previously discussed above, the Project would enhance the built environment in the surrounding neighborhood and upgrade the quality of development over existing Project Site improvements. Specifically, the proposed commercial building would be designed in a contemporary architectural style that would be compatible with the general urban characteristics of the surrounding neighborhood. The proposed commercial building would be moderated by a high degree of articulation, using both variations in building planes and façade setbacks, as well as a variety of materials, and would be designed to complement the surrounding neighborhood. The Project would also enhance the streetscape by installing landscaping, including new street trees. Proper lighting of buildings and walkways would be incorporated to maximize visibility and provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the commercial building. Parking areas would also be lit to maximize visibility and reduce areas of concealments. Finally, entrances to, and exits from the building, would be designed to be open and in view of surrounding sites. Overall, the Project would support the Redevelopment Plan's goal to improve the quality of the environment and, therefore, would not conflict with the Hollywood Redevelopment Plan goals related to scenic quality.

In summary, for all the foregoing reasons, the Project would not conflict with applicable zoning and other regulations governing scenic quality. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impact would not be considered a significant impact on the environment. **Therefore, impacts would be less than significant and no mitigation measures are required.**

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

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

Construction

While the majority of Project construction would occur during daylight hours, there is a potential that construction could occur in the evening hours and require the use of artificial lighting, particularly during the winter season when daylight is no longer sufficient earlier in the day. Outdoor lighting sources, such as floodlights, spot lights, and/or headlights associated with construction equipment and hauling trucks, typically accompany nighttime construction activities. To the extent evening construction would include 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.[18] Additionally, as part of the Project, construction lighting would be shielded such that no light source can be seen from adjacent residential properties. Construction lighting, while potentially bright, would be focused on the particular area undergoing work.

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

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

Operation

The Project would replace the existing building and associated surface parking area on the Project Site with a new six-story commercial building which would increase light and glare levels emanating from the Project Site. However, all exterior lighting would meet all applicable LAMC standards and be shielded or directed toward the areas to be illuminated. The exterior lighting would include soffit downlights in the ground floor covered area, as well as low-level landscape lighting and limited façade up-lighting to highlight key architectural features. In compliance with all applicable LAMC standards, exterior lighting on the Project Site would not illuminate adjacent properties.

No signage, other than interior wayfinding and directional signage and associated lighting, has been proposed for the Project at this time. Any signage would either meet code requirements or would be proposed under a subsequent filing. Any new street and/or pedestrian lighting within the public right-of-way would comply with all applicable City regulations and would be approved by the Bureau of Street Lighting, as required, in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties.

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

[18] LAMC Chapter 9, Article 3, Section 93.0117 provides that, no exterior light source may cause more than 2 foot-candles (21.5 1x) 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.

the horizon and when the point of reflection within the Project Site is in front of the driver, in the direction of travel. While the Project would feature a variety of surface materials, including glass, concrete, timber, and metal, the glass used in the Project's building façades would have high-performance coatings that would not be highly reflective, thereby minimizing glare from reflected sunlight. In addition, landscape and street scape elements are incorporated into the Project's design to further reduce and block glare.

Nighttime glare could result from illuminated signs and vehicle headlights. However, no signage, other than interior wayfinding and directional signage and associated lighting, has been proposed for the Project at this time. Any signage would, if proposed, would either meet code requirements or would be proposed under a subsequent filing. Furthermore, while headlights from vehicles entering and exiting the parking levels on the ground floor would be visible during the evening and nighttime hours, such lighting sources would be typical for the area. Thus, nighttime glare would not result in a substantial adverse impact.

Based on the above, with adherence to regulatory requirements, lighting associated with Project operation would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetic impact would not be considered a significant impact on the environment. **Therefore, impacts would be less than significant and no mitigation measures are required.**

II. AGRICULTURE AND FORESTRY RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒

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

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

No Impact. The Project Site is located in an urban area and is currently improved with a surface parking lot and a vacant three-story, approximately 98,352-square-foot building originally constructed in 1928 that previously housed a Sears department store. According to the Farmland Mapping and Monitoring Program data for Los Angeles County, neither the Project Site nor the surrounding area is designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[19] **Therefore, no impacts would occur and no mitigation measures are required**.

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

No Impact. The Project Site is zoned R4-1VL (Multiple Residential) and C4-1VL (Commercial) and designated by the General Plan for Neighborhood Office Commercial land uses. As such, the Project Site is not zoned for agricultural uses nor are there any agricultural uses occurring at the Project Site or within the surrounding area. The Project Site is located within an Urban Agriculture Incentive Zone; however, the Project does not involve a contract to use vacant property for agricultural purposes in exchange for reduced property taxes. According to the state's most recent Williamson Act land data, neither the Project Site nor surrounding area is under a Williamson Act contract. **Therefore, no impacts would occur and no mitigation measures are required**.

19 State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, published 2018.

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

No Impact. In the City, forest land is a permitted use in areas zoned OS (Open Space); however, the City does not have specific zoning for timberland or timberland production. The Project Site is zoned R4-1VL (Multiple Residential) and C4-1VL (Commercial) and designated by the General Plan for Neighborhood Office Commercial land uses. The Project Site is not zoned for forest land, timberland, or timberland production land uses. There are no forest or timberland resources on the Project Site or surrounding area. **Therefore, no impacts would occur and no mitigation measures are required**.

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

No Impact. The Project Site is developed with a surface parking lot and vacant commercial building and is located in an urban area. No forest land exists on or in the vicinity of the Project Site, and Project implementation would not result in the loss or conversion of forest land. **Therefore, no impacts would occur and no mitigation measures are required**.

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

No Impact. The Project Site is located in an urban area of the City. No agricultural uses, designated Farmland, or forest land uses occur at the Project Site or within the surrounding area. As such, implementation of the Project would not result in the conversion of existing Farmland, agricultural uses, or forest land on-site or off-site. **Therefore, no impacts would occur and no mitigation measures are required**.

III. AIR QUALITY

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Air quality data was generated for the Project to assist in the preparation of the following air quality analysis and is included as Appendix A to this document.

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

Less Than Significant Impact. A significant air quality impact may occur if a project would not be consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan.

The South Coast Air Quality Management District (SCAQMD) is required, pursuant to the Clean Air Act (CAA),[20] to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment of the National Ambient Air Quality Standard (NAAQS) (e.g., ozone, particulate matter ($PM_{2.5}$), and PM_{10}). The SCAQMD's 2016 AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving five NAAQS related to these pollutants, including transportation control strategies from the Southern California Association of Governments' (SCAG's) 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) designed to focus growth near High Quality Transit Areas (HQTAs) and to reduce vehicle miles traveled (VMT).[21] The SCAQMD's 2022 AQMP was adopted by the SCAQMD Governing Board on December 2, 2022; however, CARB has yet to adopt the 2022 AQMP.

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. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and state air quality requirements, including the Transportation Conformity Rule and other applicable federal, state, and air district laws and regulations. As the federally designated Metropolitan Planning Organization (MPO) for the six-county Southern California region, SCAG is required by law to ensure that transportation activities "conform" to, and are supportive of, the goals of regional and state air quality plans to attain the NAAQS. In addition, SCAG is a co-

20 United States Environmental Protection Agency, Summary of the Clean Air Act, www.epa.gov/laws-regulations/summary-clean-air-act, accessed August 9, 2021.

21 SCAQMD, Final 2016 AQMP, approved on March 3, 2017, www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15, accessed August 9, 2021.

producer, with SCAQMD, of the transportation strategy and transportation control measure sections of the AQMP for the Air Basin.

On September 3, 2020, SCAG's Regional Council adopted the 2020-2045 RTP/SCS.[22] The 2020-2045 RTP/SCS was determined to conform to the federally mandated state implementation plan (SIP), for the attainment and maintenance of NAAQS standards. The California Air Resources Board (CARB) is the lead agency for climate change programs and oversees all air pollution control efforts in California to attain and maintain health-based air quality standards. On October 30, 2020, CARB also accepted SCAG's determination that the SCS met the applicable state greenhouse gas emissions targets.

The 2016 AQMP control strategies were developed, in part, based on regional growth projections prepared by SCAG. As the AQMP control strategies are based on growth projections from local General Plans, projects whose growth is included in the projections used in the formulation of the local General Plans are considered to be consistent with the AQMP and not to interfere with its attainment.[23] Projects which include amendments to General or Specific Plans, or are considered significant projects, undergo further scrutiny for AQMP consistency. As noted above, the 2016 AQMP has been adopted by the SCAQMD and CARB. Therefore, as the 2022 has not been fully adopted, this analysis considers the Project's consistency with the 2016 AQMP.

CEQA Guidelines Section 15125 requires an analysis of project consistency with applicable governmental plans and policies. In accordance with SCAQMD's *CEQA Air Quality Handbook,*[24] the following criteria were used to evaluate the Project's consistency with the SCAQMD and SCAG regional plans and policies, including the AQMP:

- Criterion 1: Will the Project result in any of the following:
  - An increase in the frequency or severity of existing air quality violations;
  - Cause or contribute to new air quality violations; or
  - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP?
- Criterion 2: Will the Project exceed the assumptions utilized in preparing the AQMP?
  - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
  - Does the Project include air quality mitigation measures; or
  - To what extent is Project development consistent with the AQMP control measures?

22 SCAG, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176, accessed August 9, 2021.

23 SCAQMD, CEQA Air Quality Handbook, p. 12-1.

24 South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993.

The Project's impacts with respect to these criteria are discussed to assess the consistency with SCAQMD's 2016 AQMP.

Consistency Criterion No. 1: The 2016 AQMP, discussed previously, was prepared to accommodate projected growth, to reduce the high levels of pollutants within the areas under the jurisdiction of SCAQMD, to return clean air to the region, and to minimize the impact of pollution control on the economy. Projects that are considered to be consistent with the AQMP would not interfere with attainment of the AQMP's goals. Therefore, projects, uses, and activities that are consistent with the applicable assumptions used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP. The Project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

Construction Impacts

The violations that Consistency Criterion No. 1 refers to are the California Ambient Air Quality Standards (CAAQS) and NAAQS. CAAQS and NAAQS violations would occur if localized significance thresholds (LSTs) or regional significance thresholds were exceeded. The Project would not exceed the applicable LSTs or regional significance thresholds for construction activity (see discussion below under Questions 3(b), 3(c), and 3(d)). **Therefore, the Project would not conflict with the AQMP according to this criterion.**

Operational Impacts

The Project would not exceed the applicable LST or regional significance thresholds for operational activity (see discussion below under Questions 3(b), 3(c), and 3(d)). **Therefore, the Project would not conflict with the AQMP according to this criterion.**

On the basis of the preceding discussion, the Project would be consistent with the first criterion.

Consistency Criterion No. 2: The Project would not exceed the assumptions in the AQMP based on the Project buildout year.

Overview

Determining whether or not a project exceeds the assumptions utilized in preparing the 2016 AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies.[25] The following discussion provides an analysis with respect to each of these criteria.

As discussed in Section XIV, Population and Housing, the Project would not exceed the employment projections of the 2020-2045 RTP/SCS for the Los Angeles subregion. The Project's

25 South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993.

1,649 estimated net new employees would constitute approximately 3.33 percent of the employment growth forecasted between 2020 and 2025. As stated above, the goals and policies of the 2020–2045 RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS, and would therefore be consistent with the assumptions utilized in preparing the AQMP.

Regarding feasible air quality mitigation measures, the Project would not have significant impacts that require mitigation as shown below and in Appendix A. Additionally, the Project would be required to, and would, comply with applicable regulatory measures enforced by the SCAQMD. SCAQMD enforces stationary and mobile source compliance with respect to both operational and construction emissions. The Project would adhere to current and applicable regulatory compliance measures (including SCAQMD Rule 403: Fugitive Dust and Rule 1113: Architectural Coating). As such, the Project would be consistent with this criterion. No mitigation measures would be required to meet SCAQMD air quality thresholds.

With respect to land use policies set forth in the 2016 AQMP, the Project would implement several land use policies and strategies listed in the 2020-2045 RTP/SCS and the AQMP. Such land use strategies set forth in the 2016 AQMP that are applicable to the Project include planning for growth around livable corridors, providing more options for short trips/neighborhood mobility areas, expanding electric vehicle charging stations, supporting local sustainability planning, and balancing growth distribution between 500-foot buffer areas and HQTAs. The Project would provide a variety of land uses, including production studios, creative office space and restaurant space, which would help reduce vehicle miles traveled by promoting internal capture trips and would balance growth distribution within HQTAs

The Project would be developed within an existing urbanized area with an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby transit options. The availability and accessibility of public transit in the vicinity of the Project Site is documented by the Project Site's location within a SCAG-designated HQTA and City-designated TPA, as defined in the City's Zoning Information File No. 2452. In addition, the Project would provide bicycle parking spaces and amenities for the proposed uses that would serve to promote use of bicycles. The Project would also include adequate on-site parking to serve the proposed uses and would provide charging stations to serve electric vehicle per LAMC. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and opportunities for walking and biking. As such, the Project is in an appropriate location for the proposed uses and would serve the local community's demand for production studios, creative office space and restaurant uses. Thus, the Project would be compatible with the existing established land uses in the Project area. As stated above, the Project's estimated employment growth projections would not conflict with SCAG's future growth projections for the City of Los Angeles.

Additionally, the Project would include sustainability features that are further discussed in Section 3.3, Description of Project. Sustainability features of the Project include development of a production studio with creative offices and a restaurant that would meet or exceed California's Building Energy Efficiency Standards (Title 24). The Project would be designed to meet the

minimum energy efficiency standards of the Los Angeles Green Building Code. Further consideration regarding energy efficiency and sustainability would include use of ultra-low flow plumbing fixtures throughout the Project. All drains would feed into a rainwater harvesting cistern, approximately 10,000-gallon capacity, to be used entirely for irrigation of the on-site landscaping. The irrigation system would be designed to meet or exceed the state Model Water Efficient Landscape Ordinance (MWELO). The system would utilize a dedicated landscape water meter and automatic weather-based controllers with electronically operated control valves and seasonal irrigation schedules. The on-site drop-off area in the ground floor would encourage ridesharing and carpooling, while the on-site parking would include preferential parking for electric and low-emitting vehicles, and the Project would also meet or exceed code-required electric vehicle charging stations.

In addition, regarding land use developments such as the Project, SCAG's 2016-2040 and 2020-2045 RTP/SCS land use goals and policies focus on the reduction of vehicle trips and VMT. Per the City's Traffic Assessment Guidelines (TAG), projects that are consistent with the 2016-2040 and 2020-2045 RTP/SCS in terms of development location and density are part of the regional solution for meeting air pollution and greenhouse gases (GHG) goals. Projects that have less than a significant VMT impact are deemed to be consistent with the SCAG's 2016-2040 and 2020-2045 RTP/SCS and would have a less-than-significant cumulative impact on VMT. As discussed in Section XVII, Transportation, below, the Project would generate a total of 3,889 daily trips and would not result in any significant VMT transportation impacts. Therefore, the Project is consistent with the 2016-2040 and the 2020-2045 RTP/SCS. Additionally, it should be noted that because the goals and policies of the recently adopted 2020–2045 RTP/SCS are similar to, and consistent with, those of the 2016–2040 RTP/SCS, the Project would also be consistent with the 2020–2045 RTP/SCS.

In conclusion, the determination of AQMP consistency is primarily concerned with the long-term influence of the Project on air quality in the Air Basin. The Project is an infill development near transit within an existing urbanized area that would concentrate new creative office/retail uses within an HQTA, thus reducing VMT. The Project would not have a significant long-term impact on the region's ability to meet state and federal air quality standards. As discussed above, **the Project would be consistent with the growth assumptions, goals, and policies of the 2016 AQMP and, therefore, would not conflict with or obstruct implementation of the SCAQMD's 2016 AQMP. This impact would be less than significant and no mitigation measures are required**.

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

Less Than Significant Impact. A significant impact may occur if the Project would add a considerable cumulative contribution to federal or state non-attainment pollutants.

The Project has been evaluated to determine if it would violate an air quality standard or contribute to an existing or projected air quality violation. Additionally, the Project has been evaluated to determine if it would result in a cumulatively considerable net increase of a criteria pollutant for

which the South Coast Air Basin (SCAB) is non-attainment under an applicable federal or state ambient air quality standard. The significance of these potential impacts is described below.

Standards of Significance

The SCAQMD has developed significance thresholds for regulated pollutants, as summarized in Table 4.1, *SCAQMD Air Quality Significance Thresholds*. The SCAQMD's CEQA Air Quality Significance Thresholds (April 2019) indicate that any projects in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individual and cumulatively significant air quality impact. It should be noted that the SCAQMD provides a threshold for emissions of lead; however, for purposes of this analysis, no lead emissions are calculated as the Project would contain no sources of substantive lead emissions. Additionally, the air quality modeling program (discussed below) does not calculate any emissions of lead from typical construction or operational activities.

Construction Emissions

Emissions were estimated using the California Emissions Estimator Model (CalEEMod) (Version 2020.4.0) software, which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Regional data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions.

The model is considered to be an accurate and comprehensive tool for quantifying air quality impacts from land use projects throughout California and is recommended by the SCAQMD.[26] Daily regional emissions during construction are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source and fugitive dust emissions factors. The input values used in this analysis were adjusted to be project-specific for the construction schedule and the equipment used was based on CalEEMod defaults. The program uses the Emission Factor (EMFAC2017) computer program to calculate the emission rates specific for Los Angeles County for construction-related employee vehicle trips and the OFFROAD2011 computer program to calculate emission rates for heavy truck operations. EMFAC2017 and Off Road (OFFROAD2011) are computer programs generated by CARB that calculates composite emission rates for vehicles. Emission rates are reported by the program in grams per trip and grams per mile or grams per running hour. Daily truck trips and CalEEMod default trip length data were used to assess roadway emissions from truck exhaust. The maximum daily emissions are estimated values for the worst-case day and do not represent the emissions that would occur for every day of Project construction. The maximum daily emissions are compared to the SCAQMD daily

26 South Coast Air Quality Management District, California Emissions Estimator Model, http://www.aqmd.gov/caleemod/, accessed August 9, 2021.

Table 4.1
SCAQMD Air Quality Significance Thresholds

Mass Daily Thresholds[a]		
Pollutant	**Construction**	**Operation**
NO_x	100 pounds/day	55 pounds/day
VOC[b]	75 pounds/day	55 pounds/day
PM_{10}	150 pounds/day	150 pounds/day
$PM_{2.5}$	55 pounds/day	55 pounds/day
SO_x	150 pounds/day	150 pounds/day
CO	550 pounds/day	550 pounds/day
Lead	3 pounds/day	3 pounds/day
Toxic Air Contaminants and Odor Thresholds		
Toxic Air Contaminants (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
GHG	10,000 MT/yr CO2eq for industrial facilities	
Ambient Air Quality for Criteria Pollutants [c]		
NO_2 1-hour average Annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
PM_{10} 24-hour average Annual average	10.4 µg/m^3 (construction)[d] & 2.5 µg/m^3 (operation) 1.0 µg/m^3	
$PM_{2.5}$ 24-hour average	10.4 µg/m^3 (construction)[d] & 2.5 µg/m^3 (operation)	
Sulfate 24-hour average	25 µg/m^3 (state)	
CO 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	

Notes: ppm = parts per million by volume; µg/m^3 = micrograms per cubic meter

[a] *Source: SCAQMD CEQA Handbook (SCAQMD, 1993).*

[b] *The definition of volatile organic compounds (VOC) includes reactive organic gas (ROG) compounds and additional organic compounds not included in the definition of ROG. However, for the purposes of this evaluation, VOC and ROG will be considered synonymous.*

[c] *Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, table A-2 unless otherwise stated.*

[d] *Ambient air quality threshold based on SCAQMD Rule 403.*

Source: SCAQMD CEQA Handbook (SCAQMD, 1993), SCAQMD Air Quality Significance Thresholds, http://aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2, revised April 2019 and accessed: June 2021.

regional numeric indicators. Detailed construction equipment lists, construction scheduling, and emission calculations are available in the CalEEMod Output provided in Appendix A of this IS/MND document.

Construction activities associated with the Project will result in emissions of VOCs, nitrogen oxide (NO_X), sulfur oxide (SO_X), carbon monoxide (CO), PM_{10}, and $PM_{2.5}$. Construction related emissions are expected from the following construction activities:

- Demolition

- Grading
- Foundation
- Building Construction
- Architectural Coating

Construction is expected to start in 2023 and end in 2025. The construction schedule utilized in the analysis represents a "worst-case" analysis scenario even if construction were to occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.[27] The construction activities for the Project are anticipated to include: demolition of an existing surface parking lot and existing one-story, approximately 98,352 square-foot commercial building (5,820,192 tons total), grading/excavation of approximately 5.18 acres, construction of a six-story building with 109,957 square feet of studio office space, 18,087 square feet of stage support area, 388,286 square feet of creative office space, 12,378 square feet of restaurant, 22-space ground floor parking lot, and a two-level, 981-space subterranean parking structure, and application of architectural coatings.

Dust is typically a major concern during demolition and excavation/grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called "fugitive emissions". Fugitive dust emissions rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). CalEEMod was utilized to calculate fugitive dust emissions resulting from this phase of activity. The Project would be required to comply with existing SCAQMD rules for the reduction of fugitive dust emissions. SCAQMD Rule 403 establishes these procedures. Compliance with this rule would be achieved through application of standard best management practices in construction and operation activities, such as application of water or chemical stabilizers to disturbed soils, managing haul road dust by application of water, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour (mph), sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph and establishing a permanent, stabilizing ground cover on finished sites. In addition, projects that disturb 50 acres or more of soil or move 5,000 cubic yards of materials per day are required to submit a Fugitive Dust Control Plan or a Large Operation Notification Form to SCAQMD. Based on the size of the Project Site area (approximately 5.18 acres), a Fugitive Dust Control Plan or Large Operation Notification would not be required.

SCAQMD's Rule 403 minimum requirements require that the application of the best available dust control measures be used for all grading operations including the application of water or other soil stabilizers in sufficient quantity to prevent the generation of visible dust plumes. Compliance with Rule 403 would require the use of water trucks during all phases where earth moving operations would occur and was incorporated into the emissions modeling for the Project.

27 As shown in the California Emissions Estimator Model (CalEEMod) User's Guide Version 2020.4.0, Section 4.3.2 "Off-Road Equipment" as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

Construction emissions for construction worker vehicles traveling to and from the Project Site, as well as vendor trips (construction materials delivered to the Project site), were estimated based on CalEEMod. SCAQMD Rules that are currently applicable during construction activity for this Project include but are not limited to: Rule 1113 (Architectural Coatings) and Rule 403 (Fugitive Dust). Best Available Control Measures (BACMs) are considered standard regulatory requirements. As such, credit for Rule 403 and Rule 1113 were taken.

The estimated maximum daily construction emissions are summarized in Table 4.2, *Construction-Related Regional Pollutant Emissions*. Detailed construction model outputs are presented in Appendix A to this document.

As shown in Table 4.2, maximum emissions resulting from the Project construction would not exceed regional criteria pollutant thresholds established by the SCAQMD for emissions of any criteria pollutant. Thus, a less than significant impact would occur for Project-related construction-source regional emissions and no mitigation measures are required.

Table 4.2
Construction-Related Regional Pollutant Emissions

Activity	Pollutant Emissions (pounds/day)					
	ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	**28.16**	**82.67**	**38.19**	**0.28**	**17.85**	**8.13**
SCAQMD Thresholds	75	100	550	150	150	55
Exceeds Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

[a] *Maximum emissions include both on-site and off-site emissions. On-site emissions from equipment operated on-site that is not operated on public roads. On-site grading and site preparation PM_{-10} and $PM_{-2.5}$ emissions show mitigated values for fugitive dust for compliance with SCAQMD Rule 403.*
[b] *Off-site emissions from equipment operated on public roads.*
[c] *Construction, paving and painting phases may overlap.*
Source: CalEEMod Version 2020.4.0.Output, available in Appendix A.
Note: Totals may not sum due to rounding.

Operational Emissions

Operational activities associated with the Project would result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Operational emissions would be expected from the following primary sources:

- Area Source Emissions
- Energy Source Emissions
- Mobile Source Emissions

Area Source Emissions

Architectural Coatings

Over a period of time, Project buildings would create emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings as part of

maintenance activities. However, Rule 1113 (Architectural Coatings) limits the paints applied to buildings to those with 50g/L VOC content.

Consumer Products

Consumer products include, but are not limited to detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds which, when released in the atmosphere, can react to form ozone and other photochemically reactive pollutants.

Fireplaces

The Project is not proposing to install any fireplaces and therefore would not result in any emissions associated with hearths/fireplaces.

Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project.

Energy Source Emissions

Combustion Emissions Associated with Natural Gas and Electricity

Electricity and natural gas are used by almost every project. Criteria pollutant emissions are emitted through the generation of electricity and consumption of natural gas. However, because electrical generating facilities for the Project area are located either outside the region (state) or offset through the use of pollution credits (RECLAIM) for generation within the SCAB, criteria pollutant emissions from offsite generation of electricity are generally excluded from the evaluation of significance and only natural gas use is considered. Please see Section VI, Energy for additional details on energy use.

Mobile Source Emissions

Vehicles

The Project's mobile source air quality impacts are dependent on both overall daily vehicle trip generation and the effect of the Project on peak hour traffic volumes and traffic operations in the vicinity of the Project Site. The Project-related operational air quality impacts are estimated based primarily on vehicle trips generated by the Project.

On July 30, 2019, the City of Los Angeles updated its travel demand model, impact evaluation methodology, and transportation impact thresholds based on VMT. In accordance with the new CEQA Section 15064.3, although the City considers the Level of Service (LOS) which measures vehicle delay during the Site Plan Review process, the Significance of Transportation Impacts for the purposes of CEQA are now determined using the VMT metric.

The Project was evaluated against the initial screening criteria to determine if a full VMT analysis was required. The VMT portion of the traffic analysis showed that the Project would generate a total of 3,889 daily trips.[28] CalEEMod uses trip generation rates to determine mobile source emissions from Project-generated vehicle trips. Therefore, the weekday VMT trip rates from the traffic analysis were used to analyze the mobile source emissions from the Project. The weekend trip generation rates (obtained from the traffic analysis) were based on the 11th Edition ITE Manual and correspond to 8.91 trips/thousand square feet (TSF) for Studio, stage support and creative office uses and 53.64 trips/TSF for restaurant use (includes internal and transit reductions). The CalEEMod program then applies the emission factors for each trip, which is provided by the EMFAC2017 model, to determine the vehicular traffic pollutant emissions.

Fugitive Dust Related to Vehicular Travel

Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust inclusive of tire wear particulates.

Operational Emissions Summary

The potential operations-related air emissions have been analyzed for the criteria pollutants and cumulative impacts. The worst-case summer or winter criteria pollutant maximum daily emissions that would be created as a result of the Project's long-term operations have been calculated and are shown below in Table 4.3, *Regional Operational Pollutant Emissions*.

Table 4.3
Regional Operational Pollutant Emissions

Operational Activities	Pollutant Emissions (pounds/day)					
	VOC	NOx	CO	SOx	PM_{10}	$PM_{2.5}$
Maximum Emissions	**35.33**	**26.97**	**229.80**	**0.52**	**55.43**	**15.13**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod Version 2020.4.0; the higher of either summer or winter emissions for the Project, available in Appendix A.

The results from Table 4.3 show that none of the SCAQMD regional thresholds would be exceeded. Thus, a less than significant impact would occur for Project-related operational-source regional emissions and no mitigation measures are required.

In accordance with the SCAQMD methodology, projects that do not exceed the SCAQMD criteria or can be mitigated to less than criteria levels are not significant and do not add to the overall cumulative impact.[29] A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or state non-attainment pollutant.

28 Overland Traffic Consultants, Inc. Traffic Assessment Echelon Studios, August 2022.

29 South Coast Air Quality Management District, Potential Control Strategies to Address Cumulative Impacts from Air Pollution White Paper, 1993, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook, accessed August 9, 2021.

Therefore, as the Project's construction and operational emissions do not exceed SCAQMD thresholds, the Project's contribution to cumulative regional emissions would not be cumulatively considerable and, thus, would be less than significant. No mitigation measures are required.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors.

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, individuals with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Structures that house these persons or places where they gather to exercise are defined as "sensitive receptors"; they are also known to be locations where an individual can remain for 24 hours.

Surrounding land uses are comprised of commercial uses, residential uses, restaurant uses, and vacant lots.

Construction

Localized Significance – Construction

The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or state ambient air quality standards (NAAQS/CAAQS). Collectively, these are referred to as localized significance thresholds (LSTs).

The significance of localized emissions impacts depends on whether ambient levels in the vicinity of any given project are above or below state standards. In the case of CO and NO_2, if ambient levels are below the standards, a project is considered to have a significant impact if project emissions result in an exceedance of one or more of these standards. If ambient levels already exceed a state or federal standard, then project emissions are considered significant if they increase ambient concentrations by a measurable amount. This would apply to PM_{10} and $PM_{2.5}$; both of which are non-attainment pollutants.

The SCAQMD established LSTs in response to the SCAQMD Governing Board's Environmental Justice Initiative I-4. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest residence or sensitive receptor. The SCAQMD states that lead agencies can use the LSTs as another indicator of significance in its air quality impact analyses.

The local air quality emissions from construction were analyzed using the SCAQMD's Mass Rate Localized Significant Threshold Look-up Tables and the methodology described in LST Methodology prepared by SCAQMD (revised July 2008). The Look-up Tables were developed by the SCAQMD in order to readily determine if the daily emissions of CO, NOx, PM_{10}, and $PM_{2.5}$ from the Project could result in a significant impact to the local air quality. The emission thresholds

were calculated based on the Central Los Angeles source receptor area (SRA) 1 and a disturbance value of five acres per day (as the Project Site is approximately 5.18 acres).

According to LST Methodology, any receptor located closer than 25 meters (82 feet) shall be based on the 25-meter thresholds. The nearest sensitive receptors to the Project Site include: the multi-family residential uses located approximately 60 feet (~18.5 meters) north of the Site, on the on the northern side of West Virginia Avenue; the residential uses located approximately 60 feet (~18.5 meters) west of the Site, on the on the western side of North Wilton Place; the multi-family residential uses located approximately 75 feet (~23 meters) south of the Site, on the on the southern side of West Santa Monica Boulevard; and the residential uses located approximately 218 feet (~66.5 meters) northeast of the Site, on the northern side of West Virginia Avenue, east of North St. Andrews Place. Other air quality sensitive land uses are located further from the Project Site and would experience lower impacts. Table 4.4, *Local Construction Emissions at the Nearest Receptors* shows the on-site emissions from the CalEEMod model for the different construction phases and the LST emissions thresholds.

The data provided in Table 4.4, *Local Construction Emission at the Nearest Receptors* shows that none of the analyzed criteria pollutants would exceed the local emissions thresholds at the nearest sensitive receptors.

Table 4.4
Local Construction Emissions at the Nearest Receptors

Activity	On-Site Pollutant Emissions (pounds/day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Demolition	21.48	19.64	3.80	1.35
Grading/Excavation	30.62	24.76	10.39	5.87
Foundation	22.90	27.35	1.05	1.02
Building Construction	14.38	16.24	0.70	0.66
Paving	4.76	7.31	0.23	0.22
Architectural Coating	1.61	2.63	0.07	0.07
SCAQMD Thresholds[a]	**161**	**1,861**	**16**	**8**
Exceeds Threshold?	**No**	**No**	**No**	**No**

[a] *The nearest sensitive receptors to the Project Site include: the multi-family residential uses located approximately 60 feet (~18.5 meters) north of the site, on the on the northern side of Virginia Avenue; the residential uses located approximately 60 feet (~18.5 meters) west of the site, on the on the western side of N. Wilton Place; the multi-family residential uses located approximately 75 feet (~23 meters) south of the site, on the on the southern side of Santa Monica Boulevard; and the residential uses located approximately 218 feet (~66.5 meters) northeast of the site, on the northern side of Virginia Avenue, east of N. St. Andrews Place ; therefore, the 25 meter threshold was used.*

Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for 5 acres at a distance of 25 m in SRA 1 Central Los Angeles.

Construction-Related Toxic Air Contaminants

With respect to TACs, the greatest potential for TAC emissions resulting from construction of the Project would involve diesel particulate emissions associated with trucks and heavy equipment. Based on SCAQMD guidance, health effects from TACs are usually described in terms of individual cancer risk, which is the likelihood that a person exposed to TACs over a 70-year lifetime will contract cancer. Project construction activity would not result in long-term substantial sources of TAC emissions (i.e., 30 or 70 years) and would not generate ongoing construction

TAC emissions. Given the temporary and short-term construction schedule (approximately 25 months), the Project would not result in a long-term (i.e., lifetime or 30-year) exposure as a result of Project construction. Furthermore, as shown above, none of the Project's emissions exceed any local or regional thresholds.

Construction-Related Toxic Air Contaminants

With respect to TACs, the greatest potential for TAC emissions resulting from construction of the Project would involve diesel particulate emissions associated with trucks and heavy equipment. Based on SCAQMD guidance, health effects from TACs are usually described in terms of individual cancer risk, which is the likelihood that a person exposed to TACs over a 70-year lifetime will contract cancer. Project construction activity would not result in long-term substantial sources of TAC emissions (i.e., 30 or 70 years) and would not generate ongoing construction TAC emissions. Given the temporary and short-term construction schedule (approximately 25 months), the Project would not result in a long-term (i.e., lifetime or 30-year) exposure as a result of Project construction. Furthermore, as shown above, none of the Project's emissions exceed any local or regional thresholds.

In addition, the construction activities associated with the Project would be similar to other development projects in the City, and would be subject to the regulations and laws relating to toxic air pollutants at the regional, state, and Federal level that would protect sensitive receptors from substantial concentrations of these emissions. The Project would also be consistent with applicable AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. The Project would comply with the CARB Air Toxic Control Measure that limits diesel powered equipment and vehicle idling to no more than five (5) minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these would minimize emissions of TACs during construction. The Project would also comply with the requirements of SCAQMD Rule 1403 if asbestos is found during the demolition activities.

Therefore, a less than significant local air quality impact would occur from construction of the Project and no mitigation measures are required.

Operation

Localized Significance – Operation

Project-related air emissions from on-site sources such as architectural coatings, landscaping equipment, on-site usage of natural gas appliances as well as the operation of vehicles on-site may have the potential to exceed the state and federal air quality standards in the Project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin. The nearest sensitive receptors to the Project Site include: the multi-family residential uses located approximately 60 feet (~18.5 meters) north of the Site, on the on the northern side of West Virginia Avenue; the residential uses located approximately 60 feet (~18.5 meters) west of the Site, on the on the western side of North Wilton Place; the multi-family residential uses located approximately 75 feet (~23 meters) south of the Site, on the on the southern side of West Santa Monica Boulevard; and the residential uses located approximately

218 feet (~66.5 meters) northeast of the Site, on the northern side of West Virginia Avenue, east of North St. Andrews Place.

According to SCAQMD LST methodology, LSTs would apply to the operational phase of a project, if the project includes stationary sources, or attracts mobile sources (such as heavy-duty trucks) that may spend long periods queuing and idling at the site; such as industrial warehouse/transfer facilities. The Project includes the construction and operation of an approximately 510,621 square-foot studio campus building. Due the lack of on-site/stationary source emissions, no long-term localized significance threshold analysis is warranted.

CO Hot Spots Analysis

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future without and with Project CO levels to the state and federal CO standards which were presented above.

To determine if the Project could cause emission levels in excess of the CO standards discussed above, a sensitivity analysis is typically conducted to determine the potential for CO "hot spots" at a number of intersections in the general Project vicinity. Because of reduced speeds and vehicle queuing, "hot spots" potentially can occur at high traffic volume intersections with a Level of Service E or worse.

The analysis prepared for CO attainment in the South Coast Air Basin by the SCAQMD can be used to assist in evaluating the potential for CO exceedances in the South Coast Air Basin. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 Air Quality Management Plan (2003 AQMP) and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan).[30,31] As discussed in the 1992 CO Plan, peak carbon monoxide concentrations in the South Coast Air Basin are due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. Considering the region's unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of 1992 CO Plan and subsequent plan updates and air quality management plans. In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: South Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vehicles per day. As part of the 2003 AQMP CO Modeling Attainment Demonstration, an updated analysis was performed based on the 1992 CO Plan using more recent modeling techniques (dispersion modeling, emission factors).[32] The 2003 AQMP CO Modeling and Attainment Demonstration estimated that the 1-hour concentration

30 SCAQMD, Air Quality Management Plan, Appendix V, Modeling and Attainment Demonstrations, August 2003.
31 SCAQMD, Federal Attainment Plan for Carbon Monoxide, 1992.
32 SCAQMD, Air Quality Management Plan, Appendix V, Modeling and Attainment Demonstrations, August 2003.

for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day. As an initial screening step, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis. The Los Angeles Department of Transportation evaluated the Level of Service in the vicinity of the Wilshire Boulevard/Veteran Avenue intersection and found it to be Level of Service E during the morning peak hour and Level of Service F during the afternoon peak hour.

Per the approved MOU in the *Traffic Assessment Echelon Studios* (Traffic Assessment) in Appendix J of this IS/MND, the Project would generate a total of 3,889 daily trips. Figure 10b in the Traffic Assessment showed that for the Future with Project PM Peak Hour scenario, the most-impacted road segment in the Project Site vicinity would be located at Santa Monica Boulevard east of North St Andrew's Place. The road segment average daily traffic (ADT) volume at this location would be 21,150 vehicles per day. As this road segment has a volume that falls far short of 100,000 vehicles per day, no CO "hot spot" modeling was performed and no significant long term air quality impact is anticipated to local air quality with the ongoing use of the Project.

As discussed above, the Project would not exceed any of thresholds of significance recommended by the SCAQMD; therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant.

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

Less Than Significant Impact. Odors are typically associated with the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. According to the SCAQMD *CEQA Air Quality Handbook*, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The Project involves the construction and operation of an approximately 510,621-square-foot production studio and creative office campus, which is not typically associated with odor complaints.

Potential sources that may emit odors during construction activities include the application of materials, such as asphalt pavement. The objectionable odors that may be produced during the construction process are short-term in nature and are expected to cease upon the drying or hardening of the odor producing materials. Due to the short-term nature and limited amounts of odor producing materials being utilized, no significant impact related to odors would occur during construction of the Project. Diesel exhaust and volatile organic compounds would be emitted during construction of the Project, which are objectionable to some; however, emissions would disperse rapidly from the Project Site and, therefore, should not reach an objectionable level at the nearest sensitive receptors.

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.[33] The Project would not involve these types of uses. On-site trash receptacles would also be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

Construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations. In particular, Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.[34] **Therefore, impacts would be less than significant and no mitigation measures are required**.

IV. BIOLOGICAL RESOURCES

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

33 SCAQMD, CEQA Air Quality Handbook, April 1993, www.dtsc-ssfl.com/files/lib_ceqa/ref_draft_peir/Chap4_2-AirQuality/SCAQMD_1993_-_CEQA_Handbook.pdf, accessed August 9, 2021.

34 SCAQMD Rule 401, Nuisance, last amended November 9, 2001.

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?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

The following analysis is based in part on the Tree Report prepared by Paul Lewis Landscape Architect, dated April 17, 2023. All specific information on trees in the discussion below is from this report unless otherwise noted. The Tree Report is included as Appendix B of this IS/MND.

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?

No Impact. The Project Site is currently developed with a surface parking lot and vacant commercial building and is located in an urban area. The Project Site and immediately surrounding area are not within or near a designated Significant Ecological Area.[35] The Project Site does not contain any habitat capable of sustaining any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). Additionally, there are no known locally designated natural communities at the Project Site or in the immediate vicinity, nor is the Project Site located immediately adjacent to undeveloped natural open space or a natural water source that may otherwise serve as habitat for state- or federally-listed species. **Therefore, no impacts would occur and no mitigation measures are required**.

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?

No Impact. The Project Site is currently developed with a surface parking lot and vacant commercial building and is located in an urban area. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site. As discussed above, neither the Project Site nor adjacent areas are within a biological resource area or Significant Ecological Area; thus, implementation of the Project would not result in any adverse impacts to riparian habitat or other

35 Los Angeles County Department of Regional Planning, Planning & Zoning Information, GIS-NET Public online database, accessed September 2021.

sensitive natural communities. **Therefore, no impacts would occur and no mitigation measures are required**.

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

No Impact. The Project Site is currently developed with a surface parking lot and vacant commercial building and is located in an urban area. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site. As discussed above, neither the Project Site nor adjacent areas are within a biological resource area or Significant Ecological Area; thus, implementation of the Project would not result in any adverse impacts to state or federally protected wetlands such as marshes vernal pools, or coastal areas. **Therefore, no impacts would occur and no mitigation measures are required.**

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

No Impact. The Project Site is currently developed with a surface parking lot and vacant commercial building and is located in an urban area. Currently, the Project Site is surrounded by 15 non-protected street trees, plus two sucker growth trees at the site of previous street trees. The sucker growth trees are not in the form of a street tree as one is low branching and the other is multi-branched. Furthermore, as they are sucker growth from the previous street trees, there is also a chance that should they grow larger, they could fail and cause injury. Both should not be considered street trees but were included for documentation because of the size of the trunks.

There are no protected species or heritage trees on the Project Site or in the adjacent public right-of-way. As discussed in the Tree Report, included as Appendix B of this IS/MND, the Project would require the removal of all 15 street trees for proposed driveways and street improvements. The Project Site is not located in a Biological Resource Area, or a Significant Ecological Area per the City and County General Plans, and thus the Project Site is not part of a significant wildlife corridor. Additionally, there are no waterways located in the vicinity of the Project Site that are used by migratory fish, and there are no wildlife nursery sites in the area. Although unlikely, the four existing trees that would be removed could potentially provide nesting sites for migratory birds.

All migratory bird species that are native to the United States or its territories are protected under the federal Migratory Bird Treaty Act (MBTA). The federal MBTA prohibits any person unless permitted by regulations, to "pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird, included in the terms of this Convention...for the protection of migratory birds...or any part, nest, or egg of any such bird".[36] The Project would be required to

36 US Code Title 16 Conservation Chapter 7, Sections 703 et seq.; 50 CFR Part 10, accessed June 28, 2022.

comply with the MBTA to reduce potential impacts to migratory bird species that could potentially nest in the trees that would be removed as part of the Project. Thus, the Project would not interfere substantially with the movement of any native resident or migratory fish, wildlife species, or with established native resident or migratory wildlife corridors, and/or impede the use of native wildlife nursery sites. **Therefore, no impacts would occur and no mitigation measures are required.**

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

Less Than Significant Impact. As set forth in Ordinance No. 186,873, any of the following Southern California native tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, is a protected tree:

- Oak tree including Valley Oak (Quercus lobata), California Live Oak (Quercus agrifolia), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (Quercus dumosa);
- Southern California Black Walnut (Juglans californica var. californica);
- Western Sycamore (Platanus racemose); and
- California Bay (Umbellularia californica).

A Tree Report has been prepared for the Project to identify all trees on the Project Site and within the right-of-way (see Appendix B). As discussed in Section 3, Project Description above, the Project would not include any right-of-way improvements other than what are required by the City. Based on the results of the Tree Report, construction of the Project would not affect any protected trees. There are no protected species or heritage trees on the Project Site or in the adjacent public right-of-way. The Project Site is surrounded by 15 non-protected street trees, plus two sucker growth trees at the site of previous street trees. The sucker growth trees are not in the form of a street tree as one is low branching and the other is multi-branched. Furthermore, as they are sucker growth from the previous street trees, there is also a chance that should they grow larger, they could fail and cause injury. Both should not be considered street trees but were included for documentation because of the size of the trunks. Development of the Project would require the removal of all 15 existing street trees. If any street trees would be removed through the development of the Project, the Project would be required to comply with the City's tree removal procedures, and replacement trees would be required to be provided in conformance with the City's current guidelines and policies. Pursuant to LAMC Sections 62.169 and 62.170, no street trees would be removed without prior approval from Urban Forestry and applicable findings. At the time of the preparation of this document, no approvals have been given for any tree removals on-site or in the right-of-way. The existing trees identified in the Tree Report for removal would be replaced at a ratio of 2:1 with a minimum 24-inch box replacement tree as required by Ordinance

No. 186,873, resulting in a total of 30 replacement trees.[37] The Project has included 42 new street trees for the 15 street trees to be removed.

A waiver of dedication and improvements is requested for Santa Monica Boulevard with request to retain existing uniform street frontages, unlikely neighboring dedication and improvements and avoidance of creating hazards. If the waiver of dedications is not granted then 7 street trees on Santa Monica Boulevard would need to be removed.

Based on the above, the Project would not conflict with Ordinance No. 186,873. **Therefore, impacts would be less than significant and no mitigation measures are required.**

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

No Impact. The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.[38] **Therefore, no impacts would occur and no mitigation measures are required**.

V. CULTURAL RESOURCES

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

37 City of Los Angeles Ordinance No. 186,873, https://streetsla.lacity.org/sites/default/files/protected_tree_ordinance.pdf, accessed October 2022.

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

The following section summarizes and incorporates by reference the information provided in the Historical Resources Technical Report (Historic Report) for Echelon Studios, Los Angeles, prepared by Historic Resources Group, November 2022. The Historic Report is provided in its entirety in Appendix C of this IS/MND.

a. Cause a substantial adverse change in the significance of a historical resource pursuant to state CEQA Guidelines §15064.5?

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project would disturb historic resources which presently exist within the project site. Section 15064.5 of the *state CEQA Guidelines* defines a historical resource as:

1) a resource listed in or determined to be eligible by the state Historical Resources Commission, for listing in the California Register of Historical Resources;

2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or

3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record.

The fact that a resource is not listed in, or determined to be eligible for listing in the California Register, not included in a local register of historical resources (pursuant to §5020.1(k) of the Public Resources Code), or identified in an historical survey (meeting the criteria in §5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code §§5020.1 (j) or 5024.1.

Regulatory Setting

National Register of Historic Resources

The National Historic Preservation Act of 1966 established the National Register of Historic Places (National Register) as "an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation's historic resources and to indicate what properties should be considered for protection from destruction or impairment."[39] The National Register recognizes a broad range of historical and cultural resources that are significant at the national, state, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes. Within the National Register, approximately 2,500 (3 percent) of the more than 90,000 districts, buildings, structures, objects, and sites are recognized as National

39 Code of Federal Regulations (CFR) 60, https://www.ecfr.gov/cgi-bin/text-idx?SID=b36f494ab8c19284178b4c593eda2a8f&tpl=/ecfrbrow se/Title36/36cfr60_main_02.tpl, accessed August 2022).

Historic Landmarks or National Historic Landmark Districts as possessing exceptional national significance in American history and culture.[40]

Whereas individual historic properties derive their significance from one or more of the criteria discussed in the subsequent section, a historic district derives its importance from being a unified entity, even though it is often composed of a variety of resources. With a historic district, the historic resource is the district itself. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties.[41] A district is defined as a geographic area of land containing a significant concentration of buildings, sites, structures, or objects united by historic events, architecture, aesthetic, character, and/or physical development. A district's significance and historic integrity determine its boundaries.

A resource that is listed in or eligible for listing in the National Register is considered "historic property" under Section 106 of the National Historic Preservation Act.

Criteria

To be eligible for listing in the National Register, a resource must be at least 50 years of age, unless it is of exceptional importance as defined in Title 36 CFR, Part 60, Section 60.4(g). In addition, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Four criteria for evaluation have been established to determine the significance of a resource:

A. Are associated with events that have made a significant contribution to the broad patterns of our history;

B. Are associated with the lives of persons significant in our past;

C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. Have yielded, or may be likely to yield, information important in prehistory or history.

Context

To be eligible for listing in the National Register, a property must be significant within a historic context. National Register Bulletin #15 states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are "those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning...

40 United States Department of the Interior, National Park Service, "National Historic Landmarks: Frequently Asked Questions," https://www.nps.gov/subjects/nationalhistoriclandmarks/faqs .htm, accessed August 2022.

41 United States Department of the Interior, National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation, 1997, 5.

is made clear."[42] A property must represent an important aspect of the area's history or prehistory and possess the requisite integrity to qualify for the National Register.

Integrity

In addition to meeting one or more of the criteria of significance, a property must have integrity, which is defined as "the ability of a property to convey its significance."[43] The National Register recognizes seven qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance. In general, the National Register has a higher integrity threshold than state or local registers.

The National Register recognizes seven aspects or qualities that comprise integrity: location, design, setting, materials, workmanship, feeling, and association. These qualities are defined as follows:

- Location is the place where the historic property was constructed or the place where the historic event took place.
- Design is the combination of elements that create the form, plan, space, structure, and style of a property.
- Setting is the physical environment of a historic property.
- Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- Feeling is a property's expression of the aesthetic or historic sense of a particular period of time.
- Association is the direct link between an important historic event or person and a historic property.[44]

California Register of Historic Resources

The California Register of Historical Resources (California Register) is "an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change."[45] The California Register was enacted in 1992, and its regulations became official on January 1, 1998. The California Register

42 National Register Bulletin #15, 7-8.

43 National Register Bulletin #15, 44.

44 National Register Bulletin #15, 44-45.

45 California Public Resources Code, Section 5024.1[a],http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=5024, accessed August 2022.

is administered by the California Office of Historic Preservation (OHP). The criteria for eligibility for the California Register are based upon National Register criteria.[46] Certain resources are determined to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register. To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four criteria:

A. It is associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States; or

B. It is associated with the lives of persons important to local, California or national history; or

C. It embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values; or

D. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

A resource eligible for the California Register must meet one of the criteria of significance described above and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register. Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following;

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the state Office of Historic Preservation (OHP) and have been recommended to the state Historical Resources Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historic districts; and

46 California Public Resources Code, Section 5024.1[b], http://leginfo.legislature.ca.gov/faces/codes_displaySection.x. html?lawCode=PRC&sectionNum=5024.1, accessed August 2022.

- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

City of Los Angeles Historic-Cultural Monuments

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and most recently amended it in 2018 (Sections 22.171 et seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission (CHC) and criteria for designating a Historic-Cultural Monument (HCM). The CHC is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture, and architecture. The City of Los Angeles Cultural Heritage Ordinance states that an HCM designation is reserved for those resources that have a special aesthetic, architectural, or engineering interest or value of a historic nature and meet one of the following criteria:

A. The proposed HCM is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community;

B. The proposed HCM is associated with the lives of historic personages important to national, state, city, or local history; or

C. The proposed HCM embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.[47]

Unlike the National and California Registers, the Cultural Heritage Ordinance makes no mention of concepts such as physical integrity or period of significance. However, in practice, the seven aspects of integrity from the National Register and California Register are applied similarly and the threshold of integrity for individual eligibility is similar. It is common for the CHC to consider alterations to nominated properties in making its recommendations on designations. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs. In addition, the LAMC Section 91.106.4.5 states that the Los Angeles Department of Building and Safety "shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated, or has been determined by state or federal action to be eligible for designation, on the National Register of Historic Places, or has been included on the City of Los Angeles list of HCMs, without the department having first determined whether the demolition, alteration or removal may result in the loss of or serious damage to a significant historical or cultural asset. If the department determines that such loss or damage may occur, the applicant shall file an application and pay all fees for the CEQA IS/MND and Check List, as specified in Section 19.05 of the LAMC. If the IS/MND and Check List identifies the historical or cultural asset as significant, the permit shall not be issued without the department first finding that specific

47 City of Los Angeles, Los Angeles Administrative Code, Section 22.171.7.

economic, social or other considerations make infeasible the preservation of the building or structure."[48]

Summary of Previous Evaluations

Community Redevelopment Agency Survey

The Community Redevelopment Agency of the City of Los Angeles (CRA) was established in 1948 to revitalize economically underserved areas within the City of Los Angeles by increasing the supply of low-income housing, providing infrastructure for commercial and industrial development, and creating employment opportunities. To carry out these goals, the CRA adopts comprehensive plans for each Redevelopment Project Area. Some areas also include a historical resources survey that documents all of the historical resources--individual and districts--within the Redevelopment Project Area. These CRA surveys were done independent of the City's SurveyLA effort, though some of the more recent surveys may have used the same methodology and technology that was used in SurveyLA. SurveyLA did not survey areas already surveyed by the CRA. Currently, there are 32 Redevelopment Project Areas throughout Los Angeles. On September 30, 2019, the Los Angeles City Council voted to adopt Ordinance No. 186325 to effectuate the transfer of land use related plans and functions of the CRA to the City of Los Angeles. As a result, the Department of City Planning has jurisdiction over review of properties located within Redevelopment Project Areas as of November 11, 2019.

The Project Site is located within the Hollywood Redevelopment Project Area, which is located in the Hollywood Community Plan Area. As part of its responsibilities in implementing the Hollywood Redevelopment Plan, the CRA compiled historic survey data on properties within the Hollywood Redevelopment Project Area. After the CRA was dissolved and transferred to the City, the City continued this effort with an additional intensive-level survey completed in 2020. These historic resources surveys provide relevant information regarding the status of properties within the redevelopment area and are used by agencies and the community to identify potential historical resources.[49]

5601 West Santa Monica Boulevard was not identified as a potential historical resource in the 1986, 1997, 2003, or 2010 historic resources surveys of the Hollywood Redevelopment Project Area.

The 2020 Hollywood Redevelopment Project Area survey update, which was conducted according to the methodology and eligibility standards developed for SurveyLA, the City of Los Angeles' citywide historic resources survey, concurred with the previous survey findings that the former Sears Department Store at 5601 West Santa Monica is not eligible for historic designation at the federal, state, or local levels.

Santa Monica-Western Planning District

The 2020 survey update did identify a potential planning district called the Santa Monica-Western Planning District, which comprised the "parcels on the north side of West Santa Monica Boulevard

48 City of Los Angeles, Los Angeles Municipal Code, Section 91.106.4.5.1.

49 The 2020 Hollywood Redevelopment Project Area Survey results can be viewed on the SurveyLA Findings and Reports website, http://preservation.lacity.org/surveyla-findings-and-reports#Hollywood, accessed August 2022.

between North St. Andrews Place and Oxford Avenue, and both sides of Western Avenue between West Santa Monica Boulevard and Western Avenue." [50] 5601 West Santa Monica Boulevard is located within the boundaries of the Santa Monica-Western Planning District.

As defined by SurveyLA, planning districts are:

> "…geographically defined areas that do not meet eligibility standards for designation but that merit consideration in local planning. These areas generally have consistent planning concepts and features such as height, massing, setbacks, and street trees. The determination is used to inform the Community Plans and other policy documents. In some cases, the Planning District concept is used to identify a boundary identified for Historic Preservation Overlay Zone (HPOZ or local historic district) consideration through community input but not through SurveyLA field surveys. These areas require additional analysis and field work for HPOZ determination."[51]

In short, potential planning districts identified by SurveyLA or other survey efforts are not eligible for historic designation under established criteria for listing in the National Register, California Register, or as City of Los Angeles Historic Preservation Overlay Zones. Potential planning districts consist of collections of properties that specifically do not meet eligibility standards, and a property's location within a planning district is not considered evidence of eligibility for historic designation.

In documenting the Santa Monica-Western Commercial Planning District, the 2020 survey update noted that the area contains a "significant concentration of streetcar-oriented commercial buildings," but also noted:

> "While this area retains a sense of time and place, it is not eligible as a historic district. Most of its buildings have been altered to varying degrees; common alterations include the replacement of original doors and windows; the infill of original upper- story windows; and extensive modifications to storefronts and ground-level fenestration. There are also some examples of incompatible infill development that interrupt the district's pedestrian scale and orientation. The cumulative impact of these alterations has compromised the integrity of the district as a whole. Thus, the area does not meet eligibility standards as a historic district, although it may merit special consideration in the planning process."[52]

Planning districts are assigned a status code of 6LQ ("Not eligible; property identified through SurveyLA as ineligible for National Register, California Register or Historic-Cultural Monument designation; neighborhood or area may warrant special consideration for local planning"). The status code was developed in collaboration with the California Office of Historic Preservation for the purposes of SurveyLA; the SurveyLA status codes were also utilized in the 2020 Hollywood

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50 2020 Appendix C – Historic Districts and Planning Districts," in "Historic Resources Survey: Hollywood Redevelopment Project Area," https://planning.lacity.org/odocument/f7332ceb-ffe0-4ede-a1cd-ab8ca0342ea3/Appx_C_Districts.pdf, accessed February 2022.

51 SurveyLA Los Angeles Historic Resources Survey, "Field Survey Results Master Report," August 2016, https://planning.lacity.org/odocument/c118f301-cc39-4ede-af5a-3e5ec901e7be/SurveyLA_Master_Report.pdf, accessed August 2022.

52 2020 Appendix C – Historic Districts and Planning Districts.

Redevelopment Project Area survey update. Properties identified within a potential planning district are assigned a status code of 6L ("Not eligible; property identified through SurveyLA as ineligible for National Register, California Register or Historic-Cultural Monument designation; neighborhood or area may warrant special consideration for local planning").[53] Planning districts and their associated components are not considered historical resources for purposes of CEQA, and the City of Los Angeles Cultural Heritage Ordinance does not include a mechanism for designating or regulating planning districts. Therefore, the finding is noted here for reference purposes only.

SurveyLA

SurveyLA is the City of Los Angeles' citywide survey of historic resources, conducted in accordance with the standards and guidelines set forth by the National Park Service and the California state Office of Historic Preservation, and overseen by the City's Office of Historic Resources. Properties surveyed as part of SurveyLA were evaluated for eligibility for listing in the National Register of Historic Places, the California Register of Historical Resources, and as City of Los Angeles Historic-Cultural Monuments and Historic Preservation Overlay Zones.

Some parts of Los Angeles were surveyed concurrent with SurveyLA under the direction of the Community Redevelopment Agency and were not reevaluated by SurveyLA. The Hollywood Redevelopment Project Area, surveyed by the CRA in 2010, was therefore not examined as part of SurveyLA. However, as noted above, this area was resurveyed in 2020 when responsibility for the CRA transferred to the City of Los Angeles. 5601 West Santa Monica Boulevard was not found eligible in SurveyLA for designation at the national, state, or local levels.

Built Environment Resources Directory

The California Office of Historic Preservation (OHP) maintains the Built Environment Resources Directory (BERD), a database of previously evaluated resources throughout the state.[54] The BERD contains information only for cultural resources that have been processed through OHP. This includes resources reviewed for eligibility for the National Register of Historic Places and the California Historical Landmarks programs through federal and state environmental compliance laws, and resources nominated under federal and state registration programs.

The former Sears Department Store at 5601 West Santa Monica Boulevard is not listed in the BERD. However, the following addresses that are within the boundaries of the APN that includes 5601 West Santa Monica Boulevard are listed in the BERD:

- 5637 West Santa Monica Boulevard was assigned a status code of 7N, or "Needs to be reevaluated – formerly coded as may become [National Register] eligible with restoration or other specific conditions." However, demolition permits were filed for this address in 2007 and 2016, and the property is currently improved with a surface parking lot. Therefore, it appears that this evaluation corresponds to a building that has since been demolished.

53 City of Los Angeles, "California Historical Resource Status Codes and Additional SurveyLA Status Codes," http://historicplacesla.lacity.org/about_codes, accessed August 2022.

54 Description of the scope of the California BERD has been excerpted from the Built Environment Resource Directory (BERD), California Office of Historic Preservation, https://ohp.parks.ca.gov/?page_id=30338, accessed August 2022.

- 5643 West Santa Monica Boulevard was assigned a status code of 5D2, or "Contributor to a multi-component resource that is eligible for local listing or designation." However, demolition permits were filed for this address in 2007 and 2016, and the property is currently improved with a surface parking lot. Therefore, it appears that this evaluation corresponds to a building that has since been demolished.

Description of Project Site

Architectural Description

5601 West Santa Monica Boulevard is located on the northwest corner of the intersection of West Santa Monica Boulevard and North St. Andrews Place. The parcel is bounded by West Virginia Avenue to the north, North St. Andrews Place to the east, West Santa Monica Boulevard to the south, and a surface parking lot to the west which occupies the remainder of the city block. The building occupies the southeast corner of the parcel. The rear (northern) half of the lot is improved with a surface parking lot.

The three-story commercial building is set flush to the sidewalk on West Santa Monica Boulevard and North St. Andrews Place. It has a rectangular plan, simple massing, and asymmetrical composition. It has a flat built-up roof with a parapet; a false mansard with clay tile roofing wrapping the south and east facades; and a five-story tower with a pyramidal clay barrel tile roof, eave cornice, and decorative medallions. The exterior walls are of brick veneer laid vertically at the ground floor and reinforced concrete and plaster panels at the upper floors. Fenestration is limited to the tower and north façade of the building, and primarily consists of single fixed metal windows with divided lights, some with obscured glass. The primary entrance is centrally located on the south façade and consists of a projecting cement plaster bay with an arched opening. The doors are concealed from view from the public right-of-way by a temporary perimeter wall.

Alterations

Project Site observation and a review of building permits indicate that 5601 West Santa Monica Boulevard has been extensively altered since its original construction in 1928. Additions to the building began in 1930 when the auto tire service building relocated on the lot and a ten-feet-square addition was constructed to house it. In 1936, several additions followed including the construction of a 10 feet by 52 feet building for a pottery sales room and a 20 feet by 77 feet tire and battery sales building. In 1942, an 18 feet by 35 feet green house building was constructed on the property. In 1947, the existing flooring was removed and replaced due to sagging. As a result, the entrance doors were also replaced. In 1952, the auto service building was altered, and a carport was added to the building. The following year, the existing floor between the first and second stories was removed to install escalators. In 1958, a 14 feet by 30 feet lath house building was constructed. In 1959, a portion of the existing curtain wall and plaster was demolished. In 1972, the entire building exterior was remodeled with new façades, and a one-story addition was constructed at the north (rear) façade. There were interior alterations completed throughout the building's history.

The 1972 exterior alterations changed the building's overall form; covered character-defining features including all windows, doors, and decorative features except the tower; and completely obscured the building's original design and architectural character.

Historic Resources Assessment

Evaluation of Significance

5601 West Santa Monica Boulevard is assessed for potential historical significance according to established criteria for listing in the National Register of Historic Places, the California Register of Historical Resources, and as a City of Los Angeles Historic-Cultural Monument.

Criterion NR A/CR 1/Local 1 (Association with Events)

According to the National Park Service, in order for a property to be considered significant under Criterion A, it must be associated with a specific event marking an important moment in national, state, or local history or prehistory; or a pattern of events or a historic trend that made a significant contribution to the development of a community, state, or the nation; or both. Furthermore, mere association with historic events or trends is not sufficient, in and of itself, to qualify under this criterion; the property's specific association must be considered important as well.

The Historic Report did not identify any associations of 5601 West Santa Monica Boulevard with important historical events or trends that have made a significant contribution to social, historic, or cultural heritage at the national, state, or local level, and there is no evidence to indicate that the building is significant under Criterion A/1/1. While the former Sears building was constructed during the period of significance for streetcar-related commercial development, its completion in 1928 occurred nearly at the close of the period, and at a time when automobiles were swiftly replacing public transit as the most common method of transportation. As a result, the property does not reflect the trends and patterns of commercial construction influenced by streetcar development was at its peak. While the building was indeed developed along a major streetcar line, its siting and the accompanying development of an adjacent surface parking lot prioritized the growing popularity of the automobile.

At the same time, research does not demonstrate that the property represented a particularly meaningful or important milestone in the development of Sears, Roebuck and Company's retail operations. The company had constructed more than fifty retail stores by 1929; this location represents one of many outlets developed in Los Angeles during this period following the opening of the first Sears store in the city earlier in 1928, and it does not reflect a prominent or otherwise singular role in the company's plans for retail expansion. In addition, as demonstrated in the integrity analysis below, the building has been substantially altered and would not convey any such association due to lack of integrity. National Park Service guidance states that if a property's exterior is covered by a non-historic false front, it is not eligible under Criteria A, B, or C because it does not retain the visual quality necessary to convey historic or architectural significance.

For these reasons, 5601 West Santa Monica Boulevard is not eligible for listing as a historic resource under National Register Criterion A, California Register Criterion 1, or City of Los Angeles Criterion 1.

Criterion NR B/CA 2/Local 2 (Association with Important People)

According to the National Park Service, in order for a property to be considered significant under Criterion B, it must be associated with the life of an individual whose activities are demonstrably important within a local, state, or national historic context. A property is not eligible if its only justification for significance is that it was owned or used by a person who is a member of an identifiable profession, class, or social or ethnic group. It must be shown that the person gained importance within his or her profession or group. In addition, the property must be associated with a person's productive life, reflecting the time period when he or she achieved significance.

The Historic Report did not identify any associations with the lives of individuals or groups important to national, state, or local history to suggest that the building at 5601 West Santa Monica Boulevard is significant under Criterion B/2/2. Research uncovered no evidence that any employees of the Sears, Roebuck store at this location achieved successful or prominent careers as individual merchants outside of their work with the company, and the property does not represent the site of prominent or influential operations on their parts such that the property is distinguished for its association with an individual's management or operation of the site. And, as demonstrated in the integrity analysis below, the building would not reflect any such association since it has been completely altered and lacks historic integrity. National Park Service guidance states that if a property's exterior is covered by a non-historic false front, it is not eligible under Criteria A, B, or C because it does not retain the visual quality necessary to convey historic or architectural significance.

For these reasons, 5601 West Santa Monica Boulevard is not eligible for listing as a historic resource under National Register Criterion B, California Register Criterion 2, or City of Los Angeles Criterion 2.

Criterion NR C/CR 3/Local 3 (Architectural Merit)

According to the National Park Service, in order for a property to be considered significant under Criterion C, it must embody the distinctive characteristics of a type, style, period, or method of construction; or represent the work of a master architect, builder or designer; or possess high artistic values. Distinctive characteristics are those physical features or traits that commonly recur in individual types, styles, periods, or methods of construction. To be eligible, a property must clearly display sufficient characteristics to be considered a true representative example. A master is a figure of generally recognized greatness in a field, a known craftsman of consummate skill, or an anonymous craftsman whose work is distinguishable by its characteristic style or quality. A property is not eligible simply because it was designed by a prominent architect, but rather must express a particular phase, aspect, idea or theme in his or her craft. To be eligible for high artistic values, a property must express aesthetic ideals or design concepts more fully than typical properties of the type.

The building at 5601 West Santa Monica Boulevard is not a distinctive example of a type, period, or method of construction, and it does not possess high artistic values; therefore, it is not significant under Criterion C/3/3. According to National Park Service guidance, a building with some applied detailing of a particular architectural style is not eligible under Criterion C if that

detailing was added as an afterthought and not fully integrated with the overall lines and massing typical of the style. As originally designed and constructed, the former Sears building was a fairly standard and simple example of an early 20th century department store type with some relatively modest Mediterranean Revival architectural features applied to its two street façades. The building's overall form, composition, and massing did not reflect the characteristics of Mediterranean Revival architecture. In addition, the building has since been subject to extensive and substantial alterations, including the wholesale remodeling of all four of the building's façades during the second half of the 20th century. National Park Service guidance states that if a property's exterior is covered by a non-historic false front, it is not eligible under Criteria A, B, or C because it does not retain the visual quality necessary to convey historic or architectural significance. Therefore, the former Sears building is no longer able to convey its identity as a 1920s commercial building.

Architect George C. Nimmons was an accomplished practitioner who designed several notable buildings in Chicago, but his work in Southern California appears to have been limited primarily to commissions for Sears, Roebuck stores. Consequently, Nimmons' body of work in Southern California does not reflect a significant or influential contribution to the local built environment. Further, the National Park Service emphasizes that a property is not eligible simply because it was designed by a prominent architect; rather, the building must express a particular phase, aspect, idea, or theme in his or her craft. The subject property is not representative of the most distinctive and imposing buildings conceived during the most productive or recognized period of Nimmons' career, and does not exemplify the architectural merit that has been recognized in other examples of his work outside Southern California. For these reasons, 5601 West Santa Monica Boulevard is not eligible for listing as a historic resource under National Register Criterion C, California Register Criterion 3, or City of Los Angeles Criterion 3.

Criterion NR D/CA 4 (Potential to Yield Important Information)

Criterion D/4 most commonly applies to properties that contain or are likely to contain information bearing on an important archeological research question. As this evaluation applies only to built resources, the subject property was not evaluated for potential eligibility under National Register Criterion D or California Register Criterion 4.

Evaluation of Integrity

Historic integrity is the ability of a property to convey its significance and is defined as the "authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's prehistoric or historic period."[55] The National Park Service defines seven aspects of historic integrity for historic resources: location, design, setting, materials, workmanship, feeling, and association. The integrity of 5601 West Santa Monica Boulevard is evaluated below based on these seven aspects.

55 U.S. Department of the Interior, National Park Service, "National Register Bulletin 16A: How to Complete the National Register Nomination Form," (Washington, DC: 1997), 4.

- **Location**: The former Sears building remains in its original location at 5601 West Santa Monica Boulevard. Therefore, the property retains integrity of location.

- **Design**: The former Sears building has been substantially altered over time and does not retain the features associated with its original design. The building has been expanded with a number of additions, which have modified the building's original footprint, and all of the building's façades have been completely remodeled. Alterations made over time have included the removal of the building's original sculpted parapet; the replacement and/or covering of original cladding with incompatible materials; the remodeling of the building's primary entrance on the south façade; the removal of a secondary entrance on the east façade; the removal and/or enclosure of all fenestration on the primary (south), east, and west façades; and the removal and/or covering of all exterior decorative elements. The only element of the building's original construction that remains visible today is the upper story of the penthouse tower. Therefore, the property does not retain integrity of design.

- **Setting**: The area immediately surrounding the former Sears property within the block bounded by West Virginia Avenue to the north, North St. Andrews Place to the east, Santa Monica Boulevard to the south, and North Wilton Place to the west has been completely demolished with the exception of the former Sears building itself. At the time of the building's initial construction, it shared the block with a number of single-family residences which have since been removed, leaving no evidence of the building's original surroundings. In addition, a number of the residential properties to the north have been redeveloped with multi-family residences, and commercial development along the West Santa Monica Boulevard corridor generally reflects more recent construction. Therefore, the property does not retain integrity of setting.

- **Materials**: The building has undergone substantial alterations resulting in the loss of most of its original materials, including its original cladding, entrance doors, most fenestration, and decorative elements. Therefore, the property does not retain integrity of materials.

- **Workmanship**: The building does not retain integrity of design or materials and thus no longer reflects the construction techniques, finishes, and design elements that characterized it as a 1920s department store building. Therefore, the property does not retain integrity of workmanship

- **Feeling**: The former Sears building does not retain integrity of design, setting, materials, or workmanship. As a result, the building lacks the essential physical elements to convey the aesthetic and historic sense of a 1920s Sears, Roebuck department store. Therefore, the property does not retain integrity of feeling.

- **Association**: Because the property does not retain integrity of design, setting, materials, workmanship, or feeling, it cannot convey any potential direct links with important historic events or persons. Therefore, the property does not retain integrity of association.

In summary, while the former Sears building at 5601 West Santa Monica Boulevard retains integrity of location, it does not retain the other six aspects of integrity: location, design, setting,

materials, workmanship, feeling, and association. Therefore, it does not retain historic integrity and is not eligible for designation as an historical resource.

Potential Impacts to Historical Resources in the Study Area

As explained in the Historic Report, a Study Area was established to evaluate potential impacts to historical resources immediately adjacent to, and in the wider vicinity of, the Project Site. The Study Area includes those properties that could be directly or indirectly affected by the Project.

Previously identified historical resources directly adjacent to the Project Site are more likely to be adversely impacted by the Project, specifically by alteration to the immediate setting of the resources in the vicinity, or by construction activities that have the potential to de-stabilize adjacent properties. Previously identified historical resources that are physically separated from the Project Site by other buildings or streets, or by additional distance, are less likely to be adversely impacted due to this spatial separation.

Potential Direct Impacts

The historical resources included within the Study Area are physically separated from the Project Site by streets, other buildings, or both. This separation effectively buffers these resources from potential direct impacts associated with construction activities on the Project Site, including the excavation for subterranean parking. Therefore, there would be no potential direct impacts to historical resources in the Study Area.

Potential Indirect Impacts

The Project would introduce substantial new construction that would alter the surroundings of historical resources in the immediate vicinity of the Project Site. It therefore has the potential to result in indirect impacts to those resources by altering their associated setting.

As noted above, a Study Area was established to evaluate potential indirect impacts to historical resources in the Project vicinity. As described in more detail in the Historic Report (Appendix C of this IS/MND), the Study Area includes six designated historical resources. All are located on the opposite side of West Santa Monica Boulevard or Virginia Avenue, or farther, from the Project Site. As noted above, resources physically separated from the Project Site by other buildings or streets, or by additional distance, are less likely to be adversely impacted due to this spatial separation.

The Project would not materially alter any of the historical resources in the Study Area. All six resources would remain intact in their current locations; therefore, all would retain the existing physical characteristics that convey their historic significance, and would retain integrity of location, design, materials, workmanship, feeling, and association. The only aspect of their integrity that would be affected by the Project is setting. The Project would construct a mixed-use development on a parcel currently occupied by one commercial building and a surface parking lot; therefore, the immediate environs of the nearby historical resources would be considerably altered by the increased height and density on the Project Site, but that change would not result in a significant impact to any of the nearby historical resources for the reasons discussed below.

1022 North Van Ness Avenue

The Santa Monica Boulevard Elementary School at 1022 North Van Ness Avenue is significant as an excellent example of an LAUSD elementary school representing the post-1933 Long Beach earthquake period of school construction. In 1994, it was determined eligible for listing in the National Register by consensus through Section 106 process and was accordingly listed in the California Register. Therefore, it is a mandatory historical resource.

5622 West Santa Monica Boulevard

5622 West Santa Monica Boulevard was identified by SurveyLA in the 2015 Hollywood CPA survey as an excellent and rare example of early commercial development located along a former streetcar line in Hollywood; most examples from this period do not retain integrity. It was found eligible for individual listing in the National Register, California Register, and for designation as a City of Los Angeles HCM. Therefore, it is considered a potentially eligible historical resource.

5638 West Santa Monica Boulevard

5638 West Santa Monica Boulevard has been identified as an excellent example of a 1920s apartment house in Hollywood and was found eligible for individual listing Historic Resources Group Echelon Studios, Los Angeles 47 in the National Register, California Register, and for designation as a City of Los Angeles HCM. Therefore, it is considered a potentially eligible historical resource.

5511 West Sierra Vista Avenue

5511 West Sierra Vista Avenue has been identified as an excellent and rare example of early residential development in Hollywood. It was noted that the residence appears to predate surrounding development by a decade or more. The property was found eligible for individual listing in the National Register, California Register, and for designation as a City of Los Angeles HCM. Therefore, it is considered a potentially eligible historical resource.

5517-5519 West Sierra Vista Avenue

The Sierra Vista Bungalow Court at 5517-5519 West Sierra Vista Avenue has been identified as an excellent and rare example of a bungalow court, a property type which has particular significance in Hollywood. Many bungalows were built in the 1920s-30s to accommodate people working in the entertainment industry. This is one of the earlier examples. It was found eligible for listing in the National Register, California Register, and for designation as a City of Los Angeles HCM. Therefore, it is considered a potentially eligible historical resource.

5623 West Virginia Avenue

The Art Deco apartment house at 5623 West Virginia Avenue has been identified as an excellent example of Art Deco residential architecture in Hollywood. It was found eligible for individual listing in the California Register, and for designation as a City of Los Angeles HCM. Therefore, it is considered a potentially eligible historical resource.

Conclusion

There are no historical resources on the Project Site. The existing building at 5601 West Santa Monica Boulevard was constructed for Sears, Roebuck and Company in 1928. And was designed by architect George C. Nimmons. Although it originally reflected features of the Mediterranean Revival architectural style, it has been completely altered. The building was not identified as individually eligible for historic designation in any previous survey, and it is not located within a designated or potential historic district.

Based on observation of the building, a review of primary and secondary sources, and an analysis of the eligibility criteria for listing in the National Register of Historic Places, the California Register of Historical Resources, and as a City of Los Angeles Historic-Cultural Monument, the Historic Report confirmed previous survey findings that did not identify the building as eligible for historic designation. Therefore, the building is not considered a historical resource as defined by CEQA, and its demolition would not have a significant effect on the environment.

The Project would not demolish, destroy, relocate, or alter any other nearby historical resources, and thus would not impair the historical significance of any other designated or potential historical resources in the Study Area. Although the Project would alter the setting of immediately adjacent historical resources, this change would not affect any of the nearby resources' eligibility for designation at the federal, state, or local levels. **Therefore, impacts would be less than significant and no mitigation measures are required.**

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to state CEQA Guidelines §15064.5?

Less Than Significant Impact. CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within an urbanized area of the City and has been subject to grading and development in the past. Therefore, surficial archaeological resources that may have existed at one time have likely been previously disturbed. As discussed in Section 3, Project Description, of this IS/MND, the Project would involve excavation to a maximum depth of 30 to 40 feet. Thus, the Project could have the potential to disturb previously undiscovered archaeological resources.

Based on the records search conducted by the South Central Coastal Information Center (SCCIC) on January 25, 2022 and included in Appendix D of this IS/MND, no archaeological resources have been found at the Project Site or within a 0.5-mile radius of the Project Site. Nevertheless, it is always possible that unknown and unanticipated intact archaeological deposits and/or features could be present at subsurface levels. To this end, the City has established a standard condition of approval to address inadvertent discovery of archaeological resources. Should archaeological resources be inadvertently encountered, the City's condition of approval provides for temporarily halting construction activities near the encounter and retaining a qualified archaeologist to assess the find. In accordance with the condition of approval, all activities would

be conducted in accordance with regulatory requirements as set forth in CEQA Section 21083.2. Overall, with adherence to the City's condition of approval consistent with CEQA Section 21083.2, the Project would not cause a substantial adverse change in the significance of an archaeological resource. **Therefore, impacts would be less than significant and no mitigation measures are required.**

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

Less Than Significant Impact. It is unknown whether human remains are located at the Project Site. As the Project Site would be excavated for the construction of a two-level below grade parking structure, human remains may be encountered unexpectedly during grading or construction activities. state Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If human remains of Native American origin are discovered during Project construction, compliance with state laws, which fall within the jurisdiction of the Native American Heritage Commission (PRC Section 5097), relating to the disposition of Native American burials would be required. Considering the low potential for any human remains to be located on the Project Site and that compliance with regulatory standards described above would ensure appropriate treatment of any human remains unexpectedly encountered during grading activities, the Project's impact on human remains would be less than significant. **Therefore, impacts would be less than significant and no mitigation measures are required**.

VI. ENERGY

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

The following analysis of the potential energy impacts of the Project is based, in part, on Transportation Energy Consumption Worksheets prepared using the CalEEMod outputs used for the Air Quality and Greenhouse Gas analyses and the Echelon Studios Utility Infrastructure Technical Report: Energy (Energy Report) prepared for the Project by KPFF Consulting Engineers in April 2023. The Energy Report, Transportation Energy Consumption Worksheets, and CalEEMod outputs are included as Appendix E.1, Appendix E.2, and Appendix E.3.

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

Less Than Significant Impact.

Construction

Transportation-Energy

During Project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and vehicles used to deliver materials to the Site and haul material offsite. The Project would require demolition and excavation; foundation and building construction; paving and asphalt installation; and architectural coating. Based on CalEEMod modeling of the Project's emissions of CO_2e[56] and the emissions factors for transportation fuels published by the U.S. Energy Information Administration,[57] it is estimated that the Project's construction activities would consume a total of approximately 259,464 gallons of diesel fuel and approximately 62,103 gallons of gasoline. According to fuel sales data from the California Energy Commission, fuel consumption in Los Angeles County was approximately 3.06 billion gallons of gasoline and 445 million gallons of diesel fuel in 2021 (the most recent year of reported data).[58] Accordingly, the Project's transportation-energy consumption during construction would represent a negligible portion of annual gasoline and diesel fuel consumption within Los Angeles County.

Energy use during construction would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. There are no unusual Project characteristics or construction processes proposed that would require the use of equipment that would be more energy intensive and/or less energy efficient than those used for comparable construction projects. In addition, the Project would utilize construction contractors who demonstrate compliance with applicable CARB regulations that restrict the idling of heavy-duty diesel motor vehicles and govern the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Construction activities would utilize fuel-efficient equipment consistent with state and federal regulations and would comply with state measures to reduce the inefficient, wasteful, or unnecessary consumption of energy. In addition, per applicable regulatory requirements, the Project would comply with construction waste management practices to divert construction and demolition debris. These practices would result in the efficient use of transportation-energy necessary to construct the Project. Furthermore, in

56 As taken from the CalEEMod "Annual" modeling prepared for the Project, diesel-powered construction equipment (such as off-road equipment and hauling and vendor trucks) would result in approximately 2,605.23 metric tons of carbon dioxide (MTCO2e), or 5,744.532.15 pounds of CO2e, while gasoline-powered construction equipment (such as worker automobiles) would result in approximately 552.03 MTCO2e, or 1,217,226.15 pounds of CO2e. See Construction Energy Consumption Worksheet included in Appendix E.2 of this IS/MND.

57 Burning one gallon of diesel fuel generates approximately 22.4 pounds of CO2 and burning one gallon of gasoline produces approximately 19.6 pounds of CO2. Source: U.S. Energy Information Administration, Environment Carbon Dioxide Emissions Coefficients, February 2, 2016.

58 California Energy Commission, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2021. Diesel is adjusted to account for retail (50.3%) and non-retail (49.7%) diesel sales.

the interest of cost efficiency, construction contractors would not utilize fuel in a manner that is wasteful or unnecessary.

Electricity and Natural Gas

Construction activities, including those involving the construction of new buildings and facilities, typically do not involve the consumption of natural gas. In addition, construction of the Project would not require electricity to power most construction equipment as the majority of construction equipment used during demolition and grading would be gas- or diesel-powered, with the later construction phases requiring electricity-powered equipment for interior construction and architectural coatings. Overall, the use of electricity during construction would be temporary and would fluctuate according to the phase of construction. Additionally, it is anticipated that most of the electric-powered construction equipment would be hand tools (e.g., power drills, table saws, compressors) and lighting, which would result in minimal electricity usage during construction activities. Electrical demand during construction would represent a fraction of the electrical demand during operation, which, as detailed below, would be well within the supply capabilities of the provider.

Summary

Based on the above, the Project would not involve the inefficient, wasteful, and unnecessary use of energy during construction. **Therefore, impacts would be less than significant and no mitigation measures would be required.**

Operation

Transportation-Energy

Transportation-related energy in the form of gasoline and diesel fuel would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips to and from the Project Site by employees and visitors. According to the Project's Traffic Assessment, the Project would result in 27,241 daily VMT, or 9,942,965 annual VMT.[59] According to CARB's On-Road EMFAC model, diesel-powered vehicles would account for 4.69 percent of all on-road VMT and would have an average fuel efficiency weighted for percentage of miles traveled of 12 miles per gallon (mpg) in 2025 (the Project's operational year), while gasoline-powered vehicles would account for 89.16 percent of on-road VMT with a fuel efficiency of 26 mpg; electric-powered vehicles, natural-gas-powered vehicles, and plug-in hybrid vehicles would account for the remaining on-road VMT.[60] Accordingly, using the same percentages of VMT and average fuel economy projected by EMFAC, operation of the Project would consume approximately 38,860

59 27,241 daily VMT x 365 days per year = 9,942,965 annual VMT.

60 California Air Resources Board, EMFAC2021 on-road vehicle emissions factor model, EMFAC2021 (Modeling input: Los Angeles County; Fleet Aggregate; Annual; 2025). The modeling input values are considered generally representative of conditions for the region and representative of the majority of vehicles associated with Project-related VMT. See Operational Energy Consumption Worksheet included in Appendix E.2 of this IS/MND.

gallons of diesel fuel and 340,967 gallons of gasoline per year.[61] For comparison purposes, the fuel usage during Project operation would represent 0.007 percent of the projected 2025 annual on-road diesel fuel-related energy consumption in Los Angeles County and 0.01 percent of the gasoline-related energy consumption.[62]

Trips generated during operation of the Project would be consistent with other similar production studio and creative office uses of similar scale and configuration within the City and greater Southern California Region and the Project does not propose uses or operations that would inherently result in excessive vehicle trips, particularly in view of the Project Site's location in an HQTA, the existing readily available transit in the area and the Project's provision of bicycle spaces and amenities. The Project's employees and customers would utilize vehicles that comply with Combined Automobile Fleet Emissions (CAFE) fuel economy standards and the Pavley standards, which are designed to result in more efficient use of transportation fuels. And as detailed in Checklist Section XVII, Transportation, the Project would not conflict with circulation system plans.

Electricity and Natural Gas

During operation of the Project, electricity and natural gas would be consumed for multiple purposes, including, but not limited to, HVAC, refrigeration, water heating, lighting, and the use of electronics, equipment, and appliances. According to the Project's Energy Report, operation of the Project would consume 0.149 gigawatt-hours (GWh) of electricity annually and 786,960 cubic feet (cf) of natural gas daily.[63] Electricity would be provided to the Project Site by the Los Angeles Department of Water and Power (LADWP), which projects that its total sales in 2025 fiscal year (the Project's operational year) will be 23,537 GWh.[64] Natural gas would be provided to the Project Site by Southern California Gas Company (SoCalGas), which projects that natural gas consumption within SoCalGas' planning area will be approximately 2,251 million cf per day out of a total capacity available of 3,435 million cf per day in 2025 (for a remaining capacity available of 1,184 million cf per day).[65] As such, the Project's electrical demand of 0.149 GWh, would represent 0.0006 percent of LADWP's available supplies in the 2025 operational year. The Project's natural gas demand of 786,960 cf per day would represent 0.07 percent of the 1,184 million cf daily remaining available natural gas capacity after subtracting the projected consumption from the total capacity available within the SoCalGas' planning area in the 2025

61 Calculated as follows for diesel: 4.69 percent of total 9,942,965 VMT = 466,325 diesel VMT / 12 diesel mpg = 38,860 gallons of diesel. Calculated as follows for gasoline: 89.16 percent of total 9,942,965 VMT = 8,865,148 gasoline VMT / 26 gasoline mpg = 340,967 gallons of gasoline.

62 California Air Resources Board, EMFAC2021 on-road vehicle emissions factor model, EMFAC2021 (Modeling input: Los Angeles County; Fleet Aggregate; Annual; 2025). The modeling input values are considered generally representative of conditions for the region and representative of the majority of vehicles associated with Project-related VMT. According to EMFAC2021 modeling, Los Angeles County on-road vehicles will consume 533.57 million gallons of diesel and 3.67 billion gallons of gasoline in 2025 (i.e., the Project's buildout year).

63 KPFF Consulting Engineers, Echelon Studios Utility Infrastructure Technical Report: Energy, April 2023, page 8 and page 10.

64 LADWP defines its future electricity supplies in terms of sales that will be realized at the meter. LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A, Table A-1, p. A-6.

65 California Gas and Electric Utilities, 2022 California Gas Report, page 185.

operational year. Accordingly, the Project would represent a negligible percentage of the electrical and natural gas supplies available. Furthermore, LADWP has confirmed that electricity would be "provided to the Project in accordance with LADWP Rules and Regulations" and that "[t]he estimated power requirement of the Project is part of the total load growth forecast for the City."[66] Additionally, SoCalGas has confirmed that natural gas would be provided "in accordance with SoCalGas policies and rules on file with the California Public Utilities Commission."[67] SoCalGas notes that "[t]he availability of natural gas supplies is based upon natural gas supply conditions and is subject to change;" however, based on the insignificant percentage of SoCalGas' available supplies the Project would require, it is expected that the Project would not require new or expanded sources of natural gas.

The Project would also comply with standards set in the Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC) and California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. The Los Angeles Green Building Code contains mandatory measures for nonresidential uses, particularly those related to energy efficiency (i.e., renewable energy, indoor and outdoor water use, and water reuse systems). California's Green Building Standards Code (CALGreen; Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction Projects. Furthermore, the 2019 Building Energy Efficiency Standards of the California Energy Code (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the Energy Commission. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. The standards are updated every three years and each iteration is more energy efficient than the previous standards.

Summary

Based on the above, the Project would not involve the inefficient, wasteful, and unnecessary use of energy during operation. **Therefore, impacts would be less than significant and no mitigation measures would be required.**

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

Less Than Significant Impact. The energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2019 CALGreen Code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City of LA Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency. With regard to transportation related energy usage, as discussed in greater detail in Checklist Section VIII, Greenhouse Gas Emissions, the Project also would not conflict with the goals of the City of Los Angeles Sustainable City pLAn and SCAG's 2020-2045

66 City of Los Angeles, Department of Water and Power, Letter Correspondence from Ralph Jaramillo, Engineer of Customer Station Design, September 9, 2021. See Exhibit 1 in Appendix L.1 of this IS/MND.

67 Southern California Gas Company, Letter Correspondence from Jason Sum, Pipeline Planning Associate, SoCalGas-Compton HQ, Maps & Will Serve – 6501-5673 W. Santa Monica Blvd, 5612-5675 W. Virginia Ave, 1110-1118 N. Wilton Pl, August 2, 2021. See Exhibit 2 in Appendix E.1 of this IS/MND.

RTP/SCS, which incorporate VMT targets established by SB 375. The Project's development on an infill Project Site located within a SCAG-designated HQTA and a City-designated TPA that is well-served by public transit provided by Metro and LADOT would serve to reduce VMT and associated fuel consumption within the region. Overall, the Project would be designed and constructed in accordance with applicable state and local green building standards that would serve to reduce the energy demand of the Project. In addition, as discussed above, the demand for electricity and natural gas by the Project would represent only a small fraction of LADWP's and SoCalGas' projected and planned supplies. Similarly, consumption of petroleum-based fuels would also represent only a small fraction of the projected fuel use in Los Angeles County. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. **Impacts would be less than significant and no mitigation measures are required.**

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the state Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

The following analysis is based on the Geotechnical Engineering Investigation prepared by Geotechnologies, Inc., dated July 19, 2021, revised August 23, 2021. All specific information on geologic and soils conditions in the discussion below is from this report unless otherwise noted. The Geotechnical Engineering Investigation is included as Appendix F.1 of this IS/MND. The Grading Division of the Los Angeles Department of Building and Safety has stated that the Geology and Soils Report Approval Letters dated May 20, 2016, and June 27, 2016, still apply to this Project Site. The assessment letters provided by the Grading Division of the Los Angeles Department of Building and Safety are also included in Appendix F.1 of this IS/MND.

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

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

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

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

extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.[68]

Based on the Geotechnical Engineering Investigation and a review of the City's General Plan Safety Element, the Project Site is not within an Alquist-Priolo Earthquake Fault Zone or within a City-designated Fault Rupture Study Area, and no known active faults underlie the Project Site.[69] According to the Geotechnical Engineering Investigation, the Project Site is located within the Hollywood Basin. The Hollywood Basin is structurally bound by the Hollywood Fault to the north and the North South Lake Fault to the south. The Hollywood fault is the closest active fault considered capable of surface rupture, located approximately 0.75 miles northwest of the Project Site.[70] However, as concluded in the Geotechnical Engineering Investigation, the risk for surface rupture at the Project Site is considered low as there are no known faults underlying the Project Site. Furthermore, while the Project would involve excavation for the three subterranean parking levels, the proposed development would not involve mining operations or deep excavation into the earth, which could create unstable seismic conditions or stresses in the Earth's crust. The Project would not exacerbate existing fault rupture conditions and thus, the Project would not exacerbate existing environmental conditions by introducing people or structures into areas potentially susceptible to substantial adverse effects, including fault rupture. **Therefore, impacts would be less than significant and no mitigation measures are required**.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region, which generally experiences moderate to strong ground shaking in the event of an earthquake on a local or regional fault. However, as noted above, no active faults are known to pass directly beneath the Project Site. In addition, state and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. Specifically, the state and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the City's General Plan Safety Element, and the Los Angeles Building Code. Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction of the Project. Accordingly, the design and construction of the Project would comply with all applicable existing regulatory requirements, the applicable provisions of the Los Angeles Building Code relating to seismic safety, and the application of accepted and proven construction

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

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

70 Geotechnical Engineering prepared by Geotechnologies, Inc., dated July 19, 2021, revised August 23, 2021.

engineering practices. The Los Angeles Building Code incorporates current seismic design provisions of the 2019 California Building Code, with City amendments, to minimize seismic impacts. The 2019 California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of the LADBS, including the recommendations provided in a final, site-specific geotechnical report subject to review and approval by the LADBS. The Project would not involve mining operations, deep excavations into the earth, or borings of large areas and thus would not exacerbate potential on-site seismic conditions. Therefore, through compliance with regulatory requirements and site-specific geotechnical recommendations contained in a final design-level geotechnical engineering report, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. **Therefore, impacts would be less than significant and no mitigation measures are required.**

iii. Seismic-related ground failure, including liquefaction?

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

As discussed in the Geotechnical Engineering Investigation, the Project Site is not located in a state of California designated Liquefaction Hazard Zone. In addition, the historically highest groundwater level at the Project Site is approximately 20 feet below ground surface. As discussed in the Geotechnical Engineering Investigation, the subsurface soil conditions consist of consist of sandy silt to silty clay that is yellowish brown, moist, dense and stiff fill, along with older alluvium and bedrock that are not susceptible to liquefaction. Furthermore, the site-specific liquefaction analyses conducted by Geotechnologies indicated that the soils underlying the Project Site would not be susceptible to liquefaction during the design-based earthquake used for the analyses. Therefore, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving liquefaction. **Therefore, impacts would be less than significant and no mitigation measures are required.**

iv. Landslides?

No Impact. The Project Site and surrounding area consist of relatively flat topography and are not located within an area identified by the state[71] or the City[72] as having a potential for landslides,

71 City of Los Angeles Department of City Planning, Zone Information & Map Access System, http://zimas.lacity.org/, accessed September 2021.

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

or within the path of a known landslide. Furthermore, the Project does not propose substantial alterations to the existing topography that would directly or indirectly cause adverse effects related to landslides. Accordingly, the Geotechnical Engineering Investigation concluded that the Project would not be subject to hazards related to landslides and that development of the Project would be feasible from a geotechnical engineering standpoint, provided the advice and recommendations contained in the report are included in the Project plans and are implemented during construction.[73] **Therefore, no impacts would occur and no mitigation measures are required**.

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

Less Than Significant Impact. As discussed in Section 3, Project Description, of this IS/MND, the Project Site is currently fully developed with a building and surface parking; and the Project would cover the same area. As such, there would be no areas within the Project Site with exposed topsoil upon completion of the Project. However, development of the Project would require grading, excavation, and other construction activities that have the potential to disturb temporarily existing soils underneath the Project Site and expose these soils to rainfall and wind during construction, thereby potentially resulting in soil erosion. This potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities. Specifically, all grading activities would require grading permits from the LADBS, which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would be required to comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavations, and fills. Regarding soil erosion during Project operations, the potential is negligible since the Project Site would mostly remain fully developed and impervious, except for some landscaping located throughout the Project Site. However, the landscaping would include trees to prevent soil erosion. Furthermore, the Project would be required to comply with the City's LID ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. **Therefore, impacts would be less than significant and no mitigation measures are required**.

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

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

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

73 Geotechnologies, Inc., Geotechnical Engineering Investigation, Proposed Commercial Development, 5601 Santa Monica Boulevard, Los Angeles, California, July 19, 2021, revised August 23, 2021.

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

Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events. According to the Geotechnical Engineering Investigation, the fill soils that underlie the Project Site consist of sandy silt to silty clay that is yellowish brown, moist, dense and stiff. Fill was observed at a depth of two to eight feet during this investigation. Fill was observed to extend as much as eight feet below the ground surface based on previous investigations. Below the artificial fill is older alluvium and bedrock of the Puente Formation. Due to the type and density of the soils underlying the Project Site, the Project Site soils would not be considered collapsible soils. Therefore, the Project Site is not located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in collapse. Impacts associated with collapsible soils would be less than significant, and no mitigation measures are required.

Based on the above, the Project would not cause a geologic unit or soil to become unstable. The Project would not exacerbate existing conditions with regard to geologic or soil stability. **Therefore, impacts would be less than significant and no mitigation measures are required**.

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

Less Than Significant Impact. Expansive soils are typically associated with clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying.

According to the Geotechnical Engineering Investigation, on-site geologic soils are in the very low to critically high expansion range. The Expansion Index ranged from 11 to 142 for boring samples and a bulk sample remolded to 90 percent of the laboratory maximum density from this investigation and previous site investigations. In addition, additional surcharge pressure would be required for retaining walls.

As a result, the Geotechnical Engineering Investigation provides recommendations which include that, where the site excavation results in a net export, the sandier or more granular soils be segregated from the stockpile soils and the more clayey or expansive soils (that occur near the ground surface) be exported. In addition, it is recommended that soils be well blended to achieve uniformity and to reduce the overall expansion index of the newly placed controlled fill. Furthermore, for on-site soils found to be critically expansive near the ground surface, it is recommended that 15 pounds per square foot of pressure (psf) surcharge be applied to the upper 10 feet of the retaining wall as a result of the expansive property of the on-site soils. Therefore, with incorporation of the recommendations set forth in the Geotechnical Engineering Investigation into the design of the Project, the Project would not exacerbate existing environmental conditions

that could create substantial risk to life or property due to expansive soils. **Impacts would be less than significant, and no mitigation measures are required.**

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

No Impact. The Project Site is located in a developed area of the City that is served by a wastewater collection, conveyance, and treatment system operated by the City. Therefore, no septic tanks or alternative disposal systems would be necessary, nor are they proposed. **Therefore, no impacts would occur and no mitigation measures are required**.

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

Less Than Significant Impact. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. As the Project Site has been previously graded and developed, surficial paleontological resources that may have existed at one time have likely been previously disturbed. In addition, a paleontological records search conducted by the Natural History Museum for the Project Site included in Appendix F.2 of this IS/MND indicates there are no previously encountered fossil vertebrate finds located within the Project Site. However, according to the records search, vertebrate fossil localities have been discovered either at the surface or at depth nearby from the same sedimentary deposits that occur on the Project Site. As detailed in the records search fossil localities have been found in older alluvium in the vicinity of the Project Site. As discussed in the Geotechnical Engineering Investigation, artificial fill materials were encountered within the Project Site at approximately three feet depth and extend to a depth of eight feet. Older alluvial fan deposits lie below the fill materials to maximum depth explored (over 22 feet to 51 feet). Therefore, very shallow excavations are unlikely to uncover significant vertebrate deposits. However, the Project would include excavations up to a maximum depth of 30 to 40 feet below ground surface. Thus, the possibility exists that paleontological artifacts that were not discovered during prior construction or other human activity may be present. The City has established a standard condition of approval to address inadvertent discovery of paleontological resources. Should paleontological resources be inadvertently encountered, the City's condition of approval provides for temporarily halting construction activities near the encounter and retaining a qualified paleontologist to assess the find and, if necessary, developing a plan for removal and treatment of the find. Overall, with adherence to the City's condition of approval, the Project would not directly or indirectly destroy a unique paleontological resource. Impacts would be less than significant, and no mitigation measures are required. With regard to a unique geologic feature, the Project Site is currently developed with one building and surface parking and there are no unique geologic features on the Project Site. Therefore, the Project would not directly or indirectly destroy a unique geologic feature. **Therefore, impacts would be less than significant and no mitigation measures are required**.

VIII. GREENHOUSE GAS EMISSIONS

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

Air quality data was generated for the Project to assist in the preparation of the following greenhouse gas emissions analysis and is included as Appendix A to this document.

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

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

Less Than Significant Impact. Greenhouse gases (GHG) are those gaseous constituents of the atmosphere, both natural and human generated, that absorb and emit radiation at specific wavelengths within the spectrum of terrestrial radiation emitted by the earth's surface, the atmosphere itself, and by clouds.

CEQA Guidelines Section 15064.4 does not establish a numeric threshold of significance for a project's GHG emissions; instead, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions and, pursuant to CEQA Guidelines Section 15064.7, may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officer's Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence.[74] CEQA Guidelines Section 15064.4 gives lead agencies the discretion to determine whether to assess a project's emissions quantitatively or qualitatively. Although Section 15064.4 does not establish a threshold of significance, the section recommends considering certain factors, among others, when determining the significance of project's GHG emissions, including the extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the

74 CEQA Guidelines Section 15064.7(c).

project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs. Moreover, neither the state, SCAQMD, nor the City has adopted any numeric threshold for GHG emissions. Lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions and, pursuant to CEQA Guidelines Section 15064.7, may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officer's Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence.[75] The California Department of Natural Resources has also clarified that the effects of GHG emissions are cumulative impacts, and that they should be analyzed in the context of CEQA's requirements for cumulative impact analyses (see CEQA Guidelines, §§ 15064(h)(3), 15064.4(b)).[76]

Further, the Governor's Office of Planning and Research's (OPR) technical advisory on CEQA and climate change, the Department of Natural Resources Agency's Final Statement of Reasons, and CEQA Guidelines Section 15064.4 provide that a qualitative analysis of project-level impacts to determine whether a project's GHG impacts are significant can be based on a project's consistency with previously approved plans and mitigation programs, as long as such plans have adequately analyzed and mitigated GHG emissions to a less than significant level.[77]

Therefore, while the City has determined to quantify the Project's GHG emissions for informational purposes, only, the quantified Project GHG emissions are not evaluated against any numeric threshold to determine their significance. Instead, consistent with CEQA Guidelines Section 15064.4(b), the City has determined to assess the significance of the Project's GHG emissions by assessing whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. This evaluation of the Project's consistency with such plans is the sole basis for the City's determination of whether the Project's GHG emissions would be cumulatively considerable.

The 2020-2045 RTP/SCS Connect SoCal),[78] the 2017 Climate Change Scoping Plan[79] approved by the California Air Resources Board (CARB); and the Sustainable City pLAn/L.A's Green New Deal[80] all apply to the Project and are all intended to reduce GHG emissions to meet the statewide targets set forth in the California Global Warming Solutions Act of 2006 (also known as Assembly

75 CEQA Guidelines Section 15064.7(c).

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

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

78 SCAG, Adopted Final Connect SoCal 2020, https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020, accessed August 9, 2021.

79 CARB, California's 2017 Climate Change Scoping Plan, https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf, accessed August 9, 2021.

80 L.A.'s Green New Deal, Sustainability Plan 2019, https://plan.lamayor.org/, accessed August 9, 2021.

Bill (AB) 32) and the Global warming Solutions Act (also known as Senate Bill (SB) 32). Thus, the City has determined that the Project would not have a significant effect on the environment if the Project is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions, including the emissions reduction measures discussed within CARB's 2017 Climate Change Scoping Plan, the mobile source-based reductions in the 2020-2045 RTP/SCS, and the Sustainable City pLAn/L.A.'s Green New Deal. The Project's consistency with these applicable regulatory plans and policies is discussed in threshold (b) below.

Quantification of the Project's GHG Emissions

The calculation of the amount of GHG emissions that would be attributable to the Project using recommended air quality models is described below. The primary purpose of quantifying the Project's GHG emissions is to satisfy state CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate a project's GHG emissions. Again, however, the significance of the Project's GHG emissions is not based on their amount.

The Project is anticipated to generate GHG emissions from area sources, energy usage, mobile sources, waste, water/wastewater, and construction equipment. The following describes the methodology used to calculate the Project-related GHG emissions and the Project impacts.

CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California, who provided data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) to account for local requirements and conditions. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California. CalEEMod Version 2020.4.0 was used to calculate the GHG emissions from the Project. The CalEEMod Annual Output for year 2025, for the Project, is available in Appendix A, of this document. Each source of GHG emissions is described in greater detail below.

Area Sources

Area sources include emissions from consumer products, landscape equipment and architectural coatings. The Project would comply with SCAQMD Rule 1113. SCAQMD Rule 1113 states that paints applied to building envelope are limited to 50g/L VOC content. No changes were made to the default area source emissions.

Energy Usage

Energy usage includes emissions from the generation of electricity and natural gas used on-site. No changes were made to the default energy usage parameters.[81]

81 No changes were made to the CalEEMod default energy use settings. The baseline for the current CalEEMod energy use defaults is 2019 Title 24 Standards.

Mobile Sources

Mobile sources include emissions from the additional vehicle miles generated from the Project. The vehicle trips associated with the Project have been analyzed based on the Project trip generation rates as detailed in Section III, Air Quality, above. Per the Traffic Assessment (Appendix J), the Project would generate 3,889 daily vehicle trips (with incorporation of TDM strategies as Project Design Features). As a Project Design Feature incorporated into the Project (**PDF TR-1**), the Project would incorporate permissible reductions to the vehicle parking supply below what is required per LAMC, provide a sufficient number of bicycle parking spaces to meet City of Los Angeles bicycle parking requirements per LAMC Section 12.21.A.16 by providing 56 short term bicycle parking spaces, 106 long term bicycles spaces, and 10 showers and a total of 162 secure lockers. Based on the data and analyses in the Traffic Assessment, the Project would not result in any significant VMT transportation impacts.

Emissions of GHGs associated with mobile sources from operation of the Project are based on the average daily trip rate, trip distance, the GHG emission factors for the mobile sources, and the Global Warming Potential (GWP) values for the GHGs emitted. The types of vehicles that would visit the Project Site include all vehicle types including automobiles, light-duty trucks, delivery trucks, and waste haul trucks. Modeling for the Project was conducted using the vehicle fleet mix for the Los Angeles County portion of the South Coast Air Basin as provided in EMFAC2017 and CalEEMod.

Waste

Waste includes the GHG emissions generated from the processing of waste from the Project as well as the GHG emissions from the waste once it is interred into a landfill. According to the City of Los Angeles Zero Waste Progress Report (March 2013), the City achieved a landfill diversion rate of approximately 76 percent by year 2012.[82] AB 341 requires that 75 percent of waste be diverted from landfills by 2020. It is anticipated that the Project would recycle at least 50 percent of its solid waste (see Appendix A mitigated values in the Annual CalEEMod output for details on reduction emissions). No other changes were made to the default waste parameters.

Water/Wastewater

Water includes the water that would be used for the interior of the building as well as for landscaping and is based on the GHG emissions associated with the energy associated with supplying and treating water and wastewater. Reductions for Project Design Features (low-flow appliances and water-efficient landscape irrigation) are shown in the mitigated CalEEMod output values. No other changes were made to the default water usage parameters.

Construction

The construction-related GHG emissions were also included in the analysis and were then amortized based on a 30-year amortization rate as recommended in the SCAQMD GHG Working

82 City of Los Angeles, Department of Public Works, LA Sanitation, Zero Waste Progress Report, March 2013.

Group meeting on November 19, 2009.[83] The construction-related GHG emissions were calculated by CalEEMod.

The GHG emissions have been calculated based on the methodology and parameters described above and in greater detail in Appendix A. A summary of the results is shown below in Table 4.5, *Project-Related GHG Emissions*. The CalEEMod Model runs for the both the existing use (to be removed) and the Project are provided in Appendix A of this IS/MND. Table 4.5 shows that the estimated Project's GHG emissions would total 7,878.85 MTCO2e per year.

Table 4.5
Project-Related GHG Emissions

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)
Area Sources	0.04
Energy Usage (Electricity & Natural Gas)	3,230.88
Mobile Sources (Motor Vehicles)	3,795.25
Solid Waste Generation	153.56
Water/Wastewater	593.88
Construction Emissions (amortized)	105.24
Project total	**7,878.85**

Calculation sheets are provided in Appendix A of this IS/MND.
Source: CalEEMod Version 2020.4.0 for Opening Year 2025 for the Project.

Consistency with Applicable Plans and Policies

As stated above, the City has determined to assess the significance of the Project's GHG emissions based on its consistency with statewide, regional, and local plans and policies adopted for the purpose of reducing and/or mitigating GHG emissions as the sole basis for determining whether the Project's GHG emissions would be cumulatively considerable.

Applicable plans adopted for the purpose of reducing GHG emissions include the CARB Scoping Plan (2008 and 2017 Scoping Plans), the City of Los Angeles Sustainable City pLAn/Green New Deal, and the 2020-2045 RTP/SCS discussed below.

CARB's 2008 Climate Change Scoping Plan and Subsequent Updates

The Scoping Plan includes a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a Cap-and-Trade system, and an AB 32 implementation fee

83 AQMD, Greenhouse Gas CEQA Significance Threshold Stakeholder Working Group #14, November 19, 2009, http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-14/ghg-meeting-14-main-presentation.pdf?sfvrsn=2, accessed August 9, 2021.

to fund the program. The following discussion demonstrates how the pertinent reduction actions relate to and reduce Project-related GHG emissions.

Regulatory Framework

The following applicable mandatory reduction actions/strategies would serve to indirectly reduce Project GHG emissions:

RPS Program and SB 2X: The California RPS program (Updated under Senate Bill (SB) 2X) requires both public and investor-owned utilities in California to receive at least 33 percent of their electricity from renewable sources by the year 2020. SB 350 further requires 50 percent renewables by 2030. In 2020, LADWP indicated that 34 percent of its electricity came from renewable resources in Year 2019. The CalEEMod default carbon intensity for electricity generated by LADWP (pounds of CO2e per MWh) is based on a year 2007 renewables portfolio of 8 percent and was therefore updated within CalEEMod to reflect the year 2025 renewables portfolio. Please note that under recently passed SB 100, LADWP is required to generate electricity that would increase renewable energy resources to 50 percent by 2026, 60 percent by 2030, and 100 percent by 2045. The Project complies with these percentage renewable requirements because the Project is served by LADWP. Electricity GHG emissions provided above in **Error! Reference source not found.** conservatively do not account for the additional 50-percent reduction that would be achieved by LADWP in year 2045 (difference between the 50 percent renewables assumed for the buildout year of 2025 and 100 percent required under SB 2X in year 2045). Given LADWP's demonstrated progress towards meeting and exceeding the established targets, as well as potential penalties for non-compliance, it is reasonably assumed that LADWP will comply.

SB 350: As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, Part 6 (discussed below) and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation. The Project would further support this action/strategy because it includes energy-efficient light-emitting diode (LED) lighting as well as Energy Star–labeled appliances for the Project

Cap-and-Trade Program: The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, this regulatory program applies to electric service providers and not directly to the Project. That being said, while not quantified in this analysis, the Project would benefit from this regulatory program in that the GHG emissions associated with the Project's electricity usage per year presented in Section VI, Energy, would indirectly be covered by the Cap-and-Trade Program.

Advanced Clean Cars Program: In 2012, CARB approved the Advanced Clean Cars Program, which establishes an emissions control program for model years 2017 through 2025 and increases the number of zero emission vehicles manufactured in the 2018 through 2025 model

years.[84] Standards under the Advanced Clean Cars Program apply to all passenger vehicles and light duty trucks within California and indirectly used by employees and deliveries to the Project. Since the CalEEMod model default fleet mix for the South Coast Air Basin does not yet account for this regulation, the Project's mobile source GHG emissions provided in Table 4.5 above are conservative because they could not be adjusted to include this additional 34-percent reduction, even though the Project's emissions would be reduced as a result of this Program. The Project would support this regulation since the Project would comply with the City's EV charging requirements, which specify that 10 percent of new parking spaces would require EV charging equipment.[85] The Project would further support this regulation since the Applicant would provide 196 spaces that would be electric vehicle (EV) ready and 99 would be equipped with EV charging stations.

Low Carbon Fuel Standard (LCFS): The current LCFS requires a reduction of at least 8.75 percent in the carbon intensity (CI) of California's transportation fuels by 2021.[86] CalEEMod includes implementation of LCFS into the calculation of GHG emissions from mobile sources. However, the LCFS was amended in September 2018 to target a 20 percent reduction in CI from a 2010 baseline by 2030. However, the CalEEMod model does not take into account the more recent updates to LCFS. The Project's emissions inventory conservatively does not take credit for additional GHG reductions due to the more recent LCFS requirements, but this additional 10-percent reduction in CI would indirectly reduce the Project's mobile source emissions.

California Integrated Waste Management Act of 1989: The regulation requires each jurisdiction's source reduction and recycling element to include a diversion of 50 percent of all solid waste by 2000.[87] AB 341 (2011) amended the regulation to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter.[88] The Project would comply with these percentage recycling requirements inasmuch as the Project is served by the City of Los Angeles, which currently achieves a diversion rate of 76 percent.[89] To be conservative; however, the Project-related GHG emissions from solid waste generation provided in Table 4.5 includes a 50-percent reduction in solid waste generation source emissions less than the minimum diversion rate required for the City of Los Angeles (CalEEMod default diversion rate is zero percent). The Applicant must also only contract for waste disposal services with a company

84 CARB, Advanced Clean Cars Program, ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about, accessed August 10, 2021.

85 City of Los Angeles, Ordinance No. 186485, www.ladbs.org/docs/default-source/publications/misc-publications/ordinance-186485.pdf?sfvrsn=2, accessed August 10, 2021.

86 California Air Resources Board, Data Dashboard, ww3.arb.ca.gov/fuels/lcfs/dashboard/dashboard.htm, accessed August 9, 2021.

87 California Legislative Information, state of California Public Resources Code Section 41780, https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=41780, accessed August 9, 2021.

88 California Legislative Information, Assembly Bill No. 341, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201120120AB341, accessed August 9, 2021.

89 City of Los Angeles Zero Waste Progress Report, March 2013.

that recycles solid waste in compliance with AB 341.[90] In addition, the Project would provide recycling bins at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. Consistent with CALGreen requirements, the Project would recycle and/or salvage at least 65 percent of non-hazardous construction and demolition debris, and the Applicant would prepare a construction waste management plan that, at a minimum, identifies the materials to be diverted from disposal and whether the materials would be sorted on-site or comingled.[91]

Applicable Scoping Plan Measures

Further evaluation of incorporated Project Design Features and specific applicable polices and measures in the Scoping Plan is provided below. As shown below, the Project would not conflict with the policies included in the Scoping Plan.

CCR, Title 24, Building Standards Code: The 2019 Building Energy Efficiency Standards contained in Title 24, Part 6 (also known as the California Energy Code), requires the design of building shells and building components to conserve energy. The Project would not conflict with these regulatory requirements as the Project must comply with applicable provisions of the 2020 Los Angeles Green Building Code that in turn require compliance with mandatory standards included in the California Green Building Standards such as automatic lighting controls, electric vehicle charging requirements and reduced flow rate of plumbing fixtures to conserve water.[92,93] The Project would further support this regulation since the Project would incorporate energy-efficient LED lighting throughout the Project, reducing overall energy usage compared to baseline conditions. In addition, lighting and energy usage for new structures would comply with Title 24 standards.

Senate Bill (SB) 375: SB 375 requires integration of planning processes for transportation, land-use and housing. Under SB 375, each Metropolitan Planning Organization (MPO) would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet a target, created by CARB, for reducing GHG emissions. The Project represents an infill development on a site located within an existing urbanized area that would introduce new employment, within an HQTA, consistent with the overall growth pattern encouraged in the RTP/SCS.[94] The Project Site is also well served by public transportation and the Project provides the required short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC. These and other Project characteristics would further promote a reduction in VMT and subsequent reduction in GHG emissions. Therefore, the Project would be consistent with SB 375 and the reduction in passenger vehicle GHG emissions provided in the 2020–2045 RTP/SCS. Furthermore, as shown

90 CalRecycle, Mandatory Commercial Recycling, www.calrecycle.ca.gov/recycle/commercial, accessed August 9, 2021.

91 CalRecycle, CALGreen Construction Waste Management Requirements, www.calrecycle.ca.gov/lgcentral/library/canddmodel/instruction/newstructures, accessed August 9, 2021.

92 City of Los Angeles Municipal Code (LAMC), Chapter IX, Article 9.

93 California Building Standards Commission, 2019 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11, effective January 1, 2020.

94 SCAG 2020–2045 RTP/SCS. Exhibit 2.8 Priority Growth Area—High Quality Transit Areas.

in Appendix J, incorporation of Project Design Feature **PDF TR-1** applicable to the Project results in a reduction in overall VMT in comparison to a Project without this PDF. This reduction in Project-related VMT would support the goal of the 2020–2045 RTP/SCS to reduce GHG emissions from passenger vehicles.

Senate Bill X7-7: The Water Conservation Act of 2009 set an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The state was required to make incremental progress toward this goal by reducing per-capita water use by at least 10 percent by December 31, 2015. This senate bill was an implementing measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption directly reduces the energy and the associated emissions necessary to convey, treat, and distribute the water; it also reduces emissions from wastewater treatment. The Project would comply with the City of Los Angeles Green Building Code, which requires a 20 percent reduction in water usage.[95]

As shown above, the Project would be consistent with the applicable measures established in the Scoping Plan.

LA Sustainable City pLAn/Green New Deal

On April 8, 2015, Los Angeles released the Sustainable City pLAn, which covers a multitude of environmental, social, and economic sustainability issues related to GHG emission reduction either specifically or by association. Actionable goals include increasing the green building standard for new construction, creating a benchmarking policy for building energy use, developing "blue, green, and black" waste bin infrastructure, reducing water use by 20 percent, and possibly requiring LEED Silver or better certification for new construction.

While not a plan adopted solely to reduce GHG emissions or directly applicable to private development projects, within L.A.'s Green New Deal (Sustainable City pLAn 2019), climate mitigation is one of eight explicit benefits that help define its strategies and goals.

The 2019 L.A. New Green Deal was the first four-year update to the Sustainable City pLAn. It augments, expands, and elaborates in more detail the City's vision for a sustainable future and it addresses the climate emergency with accelerated targets and new aggressive goals. The Project would contribute toward the attainment of the aspirations and goals by:

- Obtaining power from a utility provider that supplies 55% renewable energy by 2025.
- Including components that will reduce building energy use per square foot 22% by 2025.
- Reducing Vehicle Miles Traveled per capita by at least 13% by 2025.
- Ensuring 57% of new housing units are built within 1,500 feet of transit.

Through the Green New Deal, the City would reduce an additional 30 percent in GHG emissions above and beyond the 2015 pLAn and ensure that the City stays within its carbon budget between

95 City of Los Angeles Municipal Code (LAMC), Section 99.04.303.

2020 and 2050.[96]The Project would use energy from the Los Angeles Department of Water and Power (LADWP), which currently provides 34 percent of electricity via renewable sources but has committed to providing an increasing percentage from renewable sources that exceed the RPS requirements by providing 50 percent by 2025, 55 percent by 2030, and 65 percent by 2036. The Project would be designed and constructed to meet LA Green Building Code standards, where applicable, by including several measures designed to reduce energy consumption. The Project would include Energy Star® appliances where applicable and would be a modern development with energy efficient heaters and air conditioning systems. Additionally, the tower roofs would be engineered with appropriate structural loads and provided with infrastructure to accommodate large solar photovoltaic arrays to generate electricity on-site through a renewable source. As such, the Project would be consistent with the goals and initiatives in the Sustainable City pLAn/L.A. Green New Deal.

A discussion of the Project's consistency with the Sustainable City pLAn/Green New Deal targets is provided below in Table 4.6, *Project Consistency with the LA Sustainable City pLAn*.

Table 4.6
Project Consistency with the LA Sustainable City pLAn

Targets	Project Consistency
Local Water. 20% reduction in water use per capita by 2017; 22.5% by 2025; and 25% by 2035.	**No conflict**. The Project would be consistent with the LAMC to reduce water consumption by 20 percent. The Project is required to follow CALGreen Standards which mandates a 20 percent reduction in indoor water use. Therefore, the Project would also be consistent with the LA Sustainable City pLAn/Green New Deal.
Solar Power. Increase cumulative total megawatts of local solar photovoltaic power to between 900-1,500 megawatts by 2025 and 1,500 to 1,800 megawatts by 2035 as well as increasing the cumulative total megawatts of energy storage capacity to at least 1,654 to 1,750 megawatts by 2025.	**No conflict**. Compliance with the LA Green Building Code and CALGreen Code would ensure energy efficiency. The Project would include, but not be limited to: air-tight and insulated envelope, Low-E windows, Energy Star appliances, and LED lighting. The tower roofs would be engineered with appropriate structural loads and provided with infrastructure to accommodate large solar photovoltaic arrays to generate electricity on-site through a renewable source. Therefore, the Project would also be consistent with the LA Sustainable City pLAn/Green New Deal
Energy Efficient Buildings. Reduce energy use per square foot below 2013 baseline levels for all building types by at least 14% by 2025 and 30% by 2035 and use energy efficiency to deliver 15% of all of the City's projected electricity needs by 2020.	**No conflict**. Compliance with the LA Green Building Code and CALGreen Code would ensure energy efficiency. Project would include, but not be limited to: The Project would include, but not be limited to: air-tight and insulated envelope, Low-E windows, Energy Star appliances, and LED lighting. Therefore, the Project would also be consistent with the LA Sustainable City pLAn/Green New Deal
Carbon and Climate Leadership. Reduce GHG emissions below 1990 baseline by at least 45 percent by 2025, 60 percent by 2035, and 80 percent by 2050. Improve GHG efficiency of the	**No conflict.** The Project would be designed to incorporate energy and water efficient design that meet or exceed the 2019 Title 24 Building Energy Efficiency Standards and CALGreen Code standards and

96 Green New Deal. 2022. https://plan.lamayor.org/background/background_plan.html, accessed April 21, 2023.

Table 4.6
Project Consistency with the LA Sustainable City pLAn

Targets	Project Consistency
City from 2009 levels by 55 percent by 2025 and 75 percent by 2035.	incorporate energy and water efficiency measures. The Project includes design features and compliance with Code measures that will assist in the reduction of Project-related GHG emissions. Some of these design features include: The Project would include, but not be limited to: enhanced energy-efficiency via high-performance glazing as well as enhanced façade, roof and deck insulation values. The air conditioning system would be comprised of highly efficient Variable Refrigerant Flow (VRF) systems allowing for minimal electrical consumption, particularly when the building is lightly occupied. The building systems would increase the filtration of outside air being delivered to the occupied areas, and operable windows and large expanses of sliding glass doors would improve the natural ventilation whenever weather conditions permit. The glazing features would also promote daylighting and access to quality views, both of which are essential for occupant wellness and productivity. The tower roofs would be engineered with appropriate structural loads and provided with infrastructure to accommodate large solar photovoltaic arrays to generate electricity on-site through a renewable source. Indoor water usage would be minimized via the use of ultra-low flow plumbing fixtures installed throughout the Project. All drains would feed into four separate rainwater harvesting cisterns located on Parking Level 2 and 3. Their approximately 10,000-gallon capacity is to be used entirely for irrigation of the on-site landscaping. The irrigation system would be designed to meet or exceed the state Model Water Efficient Landscape Ordinance (MWELO). The irrigation system would utilize a dedicated landscape water meter and automatic weather-based controllers with electronically operated control valves and seasonal irrigation schedules. All areas would include high efficiency irrigation emitters, including micro spray and drip irrigation. Bubblers may be used for trees or shrubs where drip irrigation is not feasible. Irrigation valves would be located in inconspicuous areas, and would be parallel to adjacent structures and paving, with quick coupling valves spaced a minimum 100 feet on center. Therefore, the Project would also be consistent with the LA Sustainable City pLAn/Green New Deal
Waste and Landfills. Increase land fill diversion rates to at least 90 percent by 2025 and 95 percent by 2035, as well as increasing proportion of waste products and recyclable commodities productively reused and repurposed within the County of Los Angeles to	**No conflict**. the Project would be required to implement recycling programs that reduce waste to landfills by a minimum of 75 percent (per AB 341). The Project would be served by a solid waste collection and recycling service that may include mixed-waste processing, and that yields waste diversion results

Table 4.6
Project Consistency with the LA Sustainable City pLAn

Targets	Project Consistency
at least 25 percent by 2025 and 50 percent by 2035.	comparable to source separation and consistent with citywide recycling targets. The Project would also comply with the City of Los Angeles Space Allocation Ordinance (171,687) which requires that developments include a recycling area or a room of a specified size on the Project Site. Therefore, the Project would also be consistent with the LA Sustainable City pLAn/Green New Deal
Housing and Development. Increase cumulative new housing unit construction to 100k by 2021, 150k by 2025, and 275k by 2035. Ensure proportion of new housing units built within 1,500 feet of transit is at least 57 percent by 2025 and 65 percent by 2035.	**Not applicable.** The Project includes construction of a new, 67,889 square foot, creative office building. The Project's infill location would promote the concentration of development in an urban location with extensive infrastructure and access to public transit facilities, which would reduce vehicle miles traveled for the office space.
Mobility and Transit. Reduce daily VMT per capita by at least 5 percent by 2025 and 10 percent by 2035. Increase the percentage of all trips made by walking, biking, or transit to at least 35 percent by 2025 and 50 percent by 2035.	**No conflict.** The Project is an urban center/infill development located in close proximity to transit. Additionally, the Project is a 510,621 square-foot studio campus building. The Project would also include a two-level subterranean parking garage that would extend to a depth of approximately 30 to 40 feet below grade. Parking Level 1, bicycle parking spaces, showers and lockers, vehicular parking spaces, and valet. Parking Level 2 is dedicated to vehicular parking spaces and two cisterns. The on-site drop-off areas on the ground floor would encourage ridesharing and carpooling, while the on-site parking would provide preferential parking for electric and low-emitting vehicles. The Project would also meet or exceed code-required electric vehicle charging stations. Of the 981 parking spaces, a total of 20 spaces would be American Disability Act-compliant, 196 spaces would be electric vehicle (EV) ready and 99 would be equipped with EV charging stations. The Project's development on a Project Site in an infill location would promote the concentration of development in an urban location with extensive infrastructure and access to diverse uses and public transit facilities, which would promote multi-modal travel and reduce vehicle miles traveled for the office space.
Air Quality. Increase the percentage of electric and zero emissions vehicles in the city to 10 percent by 2025 and 25 percent by 2035 as well as increasing the percentage of port-related goods movement trips that use zero-emissions technology to at least 15 percent in 2025 and 25 percent in 2035.	**No conflict**. The Project will comply with applicable City of Los Angeles Building Codes pertaining to building code requirements for charging station prewiring and installation of charging stations at workplaces. Therefore, the Project would also be consistent with the LA Sustainable City pLAn/Green New Deal.
Note: This analysis focuses on the Sustainable City pLAn targets most applicable to the Project. *Source: City of Los Angles Sustainable City pLAn, April 2015 and L.A.'s Green New Deal Sustainable City pLAn 2019.*	

The analysis above describes the consistency of the Project with the City's *Sustainable City pLAn*. As discussed in Table 4.6, generally the Project's consistency with the plans and policies is shown through a combination of regulatory compliance (green building code etc.) as well as Project-specific characteristics (water conservation, energy conservation, and other features consistent with these plans). Therefore, the Project would be consistent with the City's applicable plans, policies, or regulations for the reduction of GHG emissions.

As discussed above, the Project would comply with the LA Green Building Code and CALGreen Code which would ensure energy efficiency and installation of water conserving fixtures. Moreover, the Project Site would utilize energy from LADWP, which is actively increasing its use of renewable sources. The Project would locate a production studio and creative office campus close to transit opportunities. The Project Site is located in an area well-served by public transit. Specifically, there is a Metro bus stop on West Santa Monica Boulevard in front of the Project Site, for westbound travel, and across the street for eastbound travel, approximately 292 feet south of the Site, for Metro Route 4, and a Metro bus stop on Western Avenue at Western Avenue/Santa Monica Boulevard, approximately 2,000 feet southeast of the Site, for Metro Route 207. The Project Site is also located within walking distance of the Metro Hollywood/Western B Line Subway, located approximately 5,280 feet north of the Project Site. The Project would provide 106 long-term bicycle parking spaces and 56 short-term spaces, for a total of 162 bike parking spaces. The Project would create a pedestrian-friendly environment by providing landscaped walkways along all street frontages. The Project Site is located adjacent to a mature network of streets that include vehicular, pedestrian and bicycle facilities. Therefore, the Project would be consistent with the goals of the LA Green New Deal/Sustainable City pLAn.

LA Green Building Code

The Los Angeles Green Building Ordinance requires that all projects filed on or after January 1, 2020 comply with the current Los Angeles Green Building Code. Mandatory measures under the Green Building Ordinance that would help reduce GHG emissions include: ten percent of the required and proposed parking spaces will have chargers for electric vehicles and 30 percent of the required and provided parking spaces will be pre-plumbed for future electric vehicle charging; enhanced energy-efficiency via high-performance glazing as well as enhanced façade, roof and deck insulation values; low-water use plumbing fixtures/appliances, rainwater harvesting cistern, water-efficient landscaping and drip irrigation. The Project would comply with the City of Los Angeles' Green Building Ordinance and reduce its GHG emissions through compliance with the Los Angeles Green Building Code.

2020-2045 RTP/SCS

The purpose of SB 375 is to implement the state's GHG emissions reduction goals by integrating land use planning with the goal of reducing car and light-duty truck travel.

Reflecting that purpose, the primary goal of the 2020–2045 RTP/SCS is to provide a framework for future growth that will decrease per capita GHG emissions from cars and light-duty trucks

based on land use planning and transportation options.[97] To accomplish this goal, the 2020–2045 RTP/SCS identifies various strategies to reduce per capita VMT. The 2020–2045 RTP/SCS is expected to help SCAG reach its GHG reduction goals, as identified by CARB, with reductions in per capita passenger vehicle GHG emissions for specified target years.[98]

In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2020–2045 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands.[99] Thus, successful implementation of the 2020–2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use. With regard to individual developments, such as the Project, strategies and policies set forth in the 2020–2045 RTP/SCS can be grouped into the following three categories: (1) reduction of vehicle trips and VMT; (2) increased use of alternative fuel vehicles; and (3) improved energy efficiency.[100] These strategies and policies are addressed below. Also, as explained immediately below, the Project is consistent with applicable growth forecasts.

Consistency with Integrated Growth Forecast

The 2020–2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review.[101] As discussed in Response to Checklist Question XIV.A, Population and Housing, below, the Project is consistent with the regional growth projections for the Los Angeles Subregion.

Consistency with VMT Reduction Strategies and Policies

The Project is designed and would be constructed to incorporate features to support and promote environmental sustainability. The Project represents an infill development within an existing urbanized area that is well served by public transportation and located adjacent to several Metro bus stops. As discussed in Response to Checklist XVII.A, Transportation, below, the Project is estimated to generate lower VMT per employee for employees than the average for the area. Additionally, the Project incorporates several TDM measures (e.g., provide required short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC) to reduce the number of single occupancy vehicle trips to the Project Site. Trip generation and VMT were

97 SCAG, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176, accessed August 10, 2021.

98 SCAG, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176, accessed August 10, 2021.

99 SCAG, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176, accessed August 10, 2021.

100 SCAG, Draft Program EIR for the 2020–2045 RTP/SC, Section 3.8, Greenhouses, December 2019, p. 3.8-61.

101 SCAG, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176, accessed August 10, 2021.

calculated using the LADOT VMT Calculator which accounts for project features such as increased density and proximity to transit. As shown in Appendix J, incorporation of reduction features applicable to the Project results in reduction in overall VMT and resultant GHG emissions, which is consistent with the GHG reduction strategies provided in the 2020–2045 RTP/SCS. The Project would also be consistent with the following key GHG reduction strategies in SCAG's 2020–2045 RTP/SCS, which are based on changing the region's land use and travel patterns:[102]

- New housing and job growth focused in High Quality Transit Areas (HQTAs);
- Limit total acreage of greenfield or otherwise rural land uses converted to urban use; and
- Reduce VMT per capita.

As discussed above, the Project represents an infill development within an existing urbanized area that would introduce new employment, within an HQTA that is well served by public transportation.[103] Furthermore, the Project VMT per capita would be well below the APC average designated for Project Site area. The Project would also provide required short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC. These and other measures would further promote a reduction in VMT and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2020–2045 RTP/SCS.

Increased Use of Alternative Fueled Vehicles Policy Initiative

The second goal of the 2020–2045 RTP/SCS, with regard to individual development projects such as the Project, is to increase alternative fueled vehicles to reduce per capita GHG emissions.[104] The 2020–2045 RTP/SCS policy initiative focuses on providing charge port infrastructure and accelerating fleet conversion to electric or other near zero-emission technologies.[105] Of the 981 parking spaces, 196 spaces would be electric vehicle (EV) ready and 99 would be equipped with EV charging stations.

Energy Efficiency Strategies and Policies

The third important goal within the 2020–2045 RTP/SCS for individual developments, such as the Project, involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions.[106] The 2020–2045 RTP/SCS goal is to actively encourage and create incentives for

102 SCAG 2020–2045 RTP/SCS, Table 5.1, Connect SoCal Performance Measures and Results.

103 SCAG 2020–2045 RTP/SCS, Exhibit 2.8, Priority Growth Area—High Quality Transit Areas.

104 SCAG, 2020–2045 RTP/SCS, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176, accessed August 10, 2021.

105 SCAG, 2020–2045 RTP/SCS, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176, accessed August 10, 2021.

106 SCAG, 2020–2045 RTP/SCS, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176, accessed August 10, 2021.

energy efficiency, where possible.[107] As discussed above, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen Code.[108,109] These standards would reduce energy and water usage and waste and, thereby, reduce associated GHG emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but not limited to; high-performance glazing as well as enhanced façade, roof and deck insulation values. The air conditioning system would be comprised of highly efficient Variable Refrigerant Flow (VRF) systems allowing for minimal electrical consumption, particularly when the building is lightly occupied. The building systems would increase the filtration of outside air being delivered to the occupied areas, and operable windows and large expanses of sliding glass doors would improve the natural ventilation whenever weather conditions permit. The glazing features would also promote daylighting and access to quality views, both of which are essential for occupant wellness and productivity. The tower roofs would be engineered with appropriate structural loads and provided with infrastructure to accommodate potential large solar photovoltaic arrays to generate electricity on-site through a renewable source.

Indoor water usage would be minimized via the use of ultra-low flow plumbing fixtures installed throughout the Project. All drains would feed into four separate rainwater harvesting cisterns located on Parking Level 2 and 3. Their approximately 10,000-gallon capacity is to be used entirely for irrigation of the on-site landscaping.

The irrigation system would be designed to meet or exceed the state Model Water Efficient Landscape Ordinance (MWELO).[110] The irrigation system would utilize a dedicated landscape water meter and automatic weather-based controllers with electronically operated control valves and seasonal irrigation schedules. All areas would include high efficiency irrigation emitters, including micro spray and drip irrigation. Bubblers may be used for trees or shrubs where drip irrigation is not feasible. Nonresidential buildings built with the 2019 Title 24 standards will use about 30 percent less energy due mainly to lighting upgrades.[111]

Land Use Assumptions

At the regional level, the 2020–2045 RTP/SCS is a plan adopted for the purpose of reducing GHGs.[112] In order to assess the Project's consistency with the 2020–2045 RTP/SCS, this IS/MND

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107 SCAG, 2020–2045 RTP/SCS, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176, accessed August 10, 2021.

108 City of Los Angeles Municipal Code (LAMC), Chapter IX, Article 9.

109 California Building Standards Commission, 2019 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11, effective January 1, 2020.

110 California Department of Water Resources, Model Water Efficient Landscape Ordinance, https://water.ca.gov/Programs/Water-Use-And-Efficiency/Urban-Water-Use-Efficiency/Model-Water-Efficient-Landscape-Ordinance, accessed October 2022.

111 CEC, 2019 Building Energy Efficiency Standards, Fact Sheet.

112 As part of the state's mandate to reduce per-capita GHG emissions from automobiles and light trucks, the 2020–2045 RTP/SCS presents strategies and tools that are consistent with local jurisdictions' land use policies and incorporates practices to achieve the state-mandated reductions in GHG emissions at the regional level through

also analyzes the Project's land use characteristics for consistency with those utilized by SCAG in its SCS. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as the 2020–2045 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. As discussed in Response to Checklist Question XI.B, Land Use and Planning, below, the Project is consistent with the land use goals and principles set forth in the 2020–2045 RTP/SCS that pertain to GHG emissions.

The Project Site is located within an HQTA as designated by the 2016 RTP/SCS.[113,114] As discussed previously, the Project Site is an urban center location close to jobs, off-site housing, shopping and entertainment uses and in close proximity to public transit stops, which would result in reduced VMT, as compared to a project of similar size and land uses at a location without close and walkable access to off-site destinations and public transit stops. The 2020-2045 RTP/SCS projects that these urban center/infill areas, while comprising only four percent of land area in the region make up 58.2 percent of household growth and 45.2 percent of job growth.

Further, the vertical integration of land uses on the Project Site would produce substantial reductions in auto mode share to and from the Project Site that would help the region accommodate growth and promote public transit ridership that would minimize GHG emission increases and reduce per capita emissions consistent with the 2020-2045 RTP/SCS, as the Traffic Assessment shows. Additionally, the inclusion of electric vehicle charging infrastructure (per LA Green Building Code) will support the penetration of electric zero-emission vehicles into the vehicle fleet.

The Project would be located on an infill site in an area well-served by public transit. Specifically, there is a Metro bus stop on West Santa Monica Boulevard in front of the Project Site, for westbound travel, and across the street for eastbound travel, approximately 292 feet south of the Site, for Metro Route 4, and a Metro bus stop on Western Avenue at Western Avenue/Santa Monica Boulevard, approximately 2,000 feet southeast of the Site, for Metro Route 207. The Project Site is also located within walking distance of the Metro Hollywood/Western B Line Subway, located approximately 5,280 feet north of the Project Site. The Project would also include bicycle facilities and would create a pedestrian-friendly environment by providing landscaped walkways. The Project Site is located adjacent to a mature network of streets that include vehicular, pedestrian and bicycle facilities. Development of the Project within this established community would promote a variety of travel choices and would create new employment and housing opportunities the area. The Project would not conflict with RTP/SCS goals to maximize mobility and accessibility for all people and goods in the region, ensure travel safety and reliability, preserve and ensure a sustainable regional transportation system, protect the environment, encourage energy efficiency and facilitate the use of alternative modes of transportation.

reduced per-capita vehicle miles traveled. SCAG 2020–2045 RTP/SCS, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176, accessed August 10, 2021.

113 SCAG, 2020 RTP/SCS September 3, 2020, Exhibit 3.8 High Quality Transit Areas (2040), p. 90.

114 Metro, High Quality Transit Areas-Southwest Quadrant Map.

As demonstrated above, the Project would be consistent with the applicable goals, including those pertaining to reductions in GHG emissions, in the 2020-2045 RTP/SCS. The Project is the type of land use development that is encouraged by the 2020–2045 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the state's long-term climate policies.[115] By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with state regulatory requirements.

As discussed, the Project would be consistent with the 2020–2045 RTP/SCS, the 2017 Scoping Plan, and the *Sustainable City pLAn/L.A.'s Green New Deal*. The Project, with its incorporation of the Project Design Features discussed in other sections of this IS/MND, would minimize its GHG emissions and would be consistent with these applicable regulatory plans and policies intended to reduce GHG emissions. **Therefore, the Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. The Project also would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Furthermore, because the Project is consistent and does not conflict with these plans, policies, and regulations, the Project's incremental increase in GHG emissions as described above would not be cumulatively considerable or result in a significant impact on the environment. Project-specific impacts with respect to GHG emissions would be less than significant, and no mitigation measures are required.**

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐

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

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

A Phase I Environmental Site Assessment Report (ESA)[116] and a Phase II Environmental Site Investigation Report (Phase II)[117] were conducted for the Project to assist in the preparation of the following hazards and hazardous materials analysis and are included as Appendix G.1 and G.2, to this document.

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

Less Than Significant Impact. Construction of the Project would involve the temporary transport, use, and disposal of potentially hazardous materials. These materials include paints, adhesives, surface coatings, cleaning agents, fuels, and oils that are typically associated with construction of any urban development project. All potentially hazardous materials associated with construction activities would be used and stored in accordance with manufacturers'

116 Partner Engineering and Science, Inc., Phase I Environmental Site Assessment Report, Vacant Sear and Two Vacant Parcels, 5601-5643 Santa Monica Boulevard and 5544, 5545 Virginia Avenue, Los Angeles, California, 90038, October 23, 2020. Refer to Appendix G.1.

117 RMD Environmental Solutions, Inc., Phase II Environmental Site Investigation Report, 5601-5643 Santa Monica Boulevard, Los Angeles, California, November 30, 2022. Refer to Appendix G.2.

instructions and handled in compliance with applicable standards and regulations, which minimizes the potential risk associated with construction-related hazardous materials. Construction activities would be contained on the Project Site and, thus, risks related to the use of such materials would be minimal and localized to the Project Site. In addition, the Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials, including, but not limited to the Resource Conservation and Recovery Act, California Hazardous Waste Control Law, Federal and state Occupational Safety and Health Acts, SCAQMD rules, and permits and associated conditions issued by LADBS. These existing regulations are aimed at the amount of hazardous materials used, accident prevention, protection from exposure to specific chemicals, and the proper storage and disposal of hazardous materials. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. Therefore, construction of the Project would not expose persons or the environment to a substantial risk resulting from the transport, use or disposal of hazardous materials during construction.

Operation of the Project would not involve the routine use, transport, or disposal of hazardous materials. The Project includes the development of a new production studio and creative office campus. The operation of the Project would involve the use of limited hazardous materials that are similar to any other urban development such as cleaning solvents, paints, and pesticides for landscaping. Studio uses, in particular, would involve the use of hazardous materials such as paints, adhesives, aerosol spray paint, as well as other materials for production and set making. Such use would be consistent with that currently occurring at other commercial and studio developments. However, as with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with manufacturer's standards and all applicable federal, state, and local requirements, such as California Hazardous Waste Control Law, Federal and California Occupational Safety and Health Acts, the Emergency Planning and Community Right-to-Know Act (Superfund Amendments and Reauthorization Act, Title III), and Safe Drinking Water and Toxic Enforcement Act, and Uniform Fire Code. Therefore, with compliance with manufacturer's standards and all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, operation of the Project would not expose persons or the environment to a substantial risk associated with the routine transport, use, or disposal of hazardous materials.

Moreover, the Project would adhere to regulatory requirements for source hazardous waste reduction measures (e.g., recycling of used batteries, recycling of elemental mercury, etc.) that would further minimize the generation of hazardous waste. The Project would be required to comply with the applicable City ordinances regarding implementation of hazardous waste reduction efforts on-site (i.e., the City's Green Building Ordinance). The applicable regulatory requirements further ensure that the minimal amount of hazardous materials associated with the Project are properly treated and disposed of at licensed resource recovery facilities or hazardous waste landfills. The potential transport of any hazardous materials and wastes, i.e., paints, adhesives, surface coatings, cleaning agents, fuels, and oils, if it occurs, would occur in accordance with federal and state regulations that govern the handling and transport of such materials. In accordance with such regulations, the transport of hazardous materials and wastes

would only occur with transporters who have received training and appropriate licensing. **Therefore, impacts would be less than significant and no mitigation measures are required**.

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

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact to hazards and hazardous materials if:

- The project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, asbestos, chemicals or radiation); or
- The project involved the creation of any health hazard or potential health hazard.

As stated above, an ESA and a Phase II Report were conducted for the Project Site (see Appendices D.1 and D.2). The ESA was performed in conformance with the scope and limitations of ASTM Standard Practice 1527-13. The purpose of the investigation was to identify the presence of any recognized environmental conditions (RECs), including controlled recognized environmental conditions (CRECs) and historical recognized environmental conditions (HRECs), in connection with the Project Site. RECs are defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release.

According to available historical sources and a previous subsurface investigation of the Project Site, several environmentally sensitive operations historically occupied the Project Site. Based on the findings of the ESA, the following areas of concern (AOCs) were identified at the Project Site in the previous ESA:

- A laundromat was identified in operation at 5663 West Santa Monica Boulevard between approximately 1954 to 1967. Due to concerns of historical use of dry cleaning solvents (tetrachlorethylene ["PCE"]), this lot was identified as a potential concern for historical releases to soil and/or groundwater.
- Automotive service and repair operations were reported at 5667 West Santa Monica Boulevard between 1955 and 2009. This lot was identified as the likely historical site of Sears Auto Center although historical documents, including a permitted waste oil tank, were listed at 5601 and 5603 West Santa Monica Boulevard, the main Sears building. Eight hydraulic lifts and a drain sample box, as well as a potential vent pipe were observed at this former building in 2015. Concerns regarding potential repair operations were also identified based on the observation of disassembled engines and motor parts in the former buildings at 5637 and 5643-45 West Santa Monica Boulevard (Gosen Auto Body Part – 2002). Two potential former underground storage tanks (USTs) were also identified to the north of the Sears Automotive Center building on the southwestern corner of the site (5667 West Santa Monica Boulevard).

- An automotive repair facility was located at 5617 West Santa Monica Boulevard (Gaylord AS) and an automobile service station was identified at 5615 West Santa Monica Boulevard in 1924 (Omara Marony). These locations appear to be located under the footprint of the current Sears Building which includes a basement level.

Based on the results of the previous subsurface investigation, it appears that past releases at the Project Site have resulted in volatile organic compounds (VOC) impacts to soil gas at concentrations exceeding applicable regulatory screening levels, which is considered a REC and a potential risk of vapor intrusion to future buildings at the Project Site.

Furthermore, two gasoline stations appear to have been formerly located within the southeastern and southwestern portions of the Project Site. The gasoline station formerly located within the southeastern portion of the Site appears to have been located within the footprint of the current Sears building, which contains a basement. It is likely that any USTs and associated soil impacts associated with this former gasoline station would have been discovered and removed during the development of the current Sears building, which included excavation to at least 10 feet bgs for the basement. No documentation pertaining to the removal and closure of suspected USTs at the former gasoline station location within the southwestern portion of the Project Site was identified during the course of the ESA preparation. As such, the current presence or absence of USTs and associated impacts to the subsurface are unknown and the former gasoline station and presumed UST fueling systems located within the southwestern portion of the Project Site are considered a REC.

According to the regulatory database report and the previous subsurface investigation of the Project Site, a waste oil UST was identified at the address of the main Sears building at 5601 West Santa Monica Boulevard. However, this waste oil UST was presumed to be associated with the Sears Automotive Center at 5667 West Santa Monica Boulevard, which was consistent with the presence of an UST vent pipe observed by Northgate on the 5667 West Santa Monica Boulevard building. Additionally, an UST of unreported size or contents was identified in the regulatory database report at the historical property address of 5657 West Santa Monica Boulevard, within the southwestern portion of the Project Site. No documentation pertaining to the removal and closure of these former USTs was identified during the course of ESA preparation. As such, the current presence or absence of the USTs and associated impacts to the subsurface are unknown and the USTs are considered a REC.

According to the Sanborn map review, a battery and lube oil facility was located to the northwest of the current Sears building from at least 1950 until circa 1957. This area was later converted for use as a garden supplies storage area by 1960. This location does not appear to have been previously investigated. Past releases of hazardous substances and/or petroleum products may have occurred at this location which is considered a REC.

Per the recommendations of the ESA, sampling activities were conducted on the Project Site. The ESA concluded that the presence of benzene, naphthalene, and PCE in soil vapor is indicative of a historic release or spill to the subsurface and may be present at the Project Site in soil at concentrations above regulatory screening levels. The ESA also concluded that based on the long-term on-site automotive operations and the possible historic on-site dry cleaner, coupled with

the compounds found in soil vapor, there is a reasonable probability that there may be localized areas on the Project Site where soil and/or soil vapor concentrations may exceed both residential and commercial regulatory screening levels. Therefore, the ESA recommended that a Phase II investigation including a ground-penetrating radar (GPR) or similar geophysical survey should be conducted to determine whether UST(s) remain on-site, and whether there is evidence of associated impact to the Project Site.

The Phase II soil investigations reported low concentrations of total petroleum hydrocarbons (TPH), VOCs, and metals in the shallow soil. The concentrations reported were below regulatory action levels. With regards to soil disposal and planning for Project Site grading, additional California's Soluble Threshold Limit Concentration (STLC) analysis was conducted for chromium and lead. STLC soil analytical results demonstrate the chromium and lead detected in the composite samples does not fall under hazardous waste classification. Furthermore, low concentrations of PCE were detected in groundwater both historically and during the Phase II investigation. The concentrations were very low and not at levels that would require active remediation in groundwater. Concentrations of VOCs were detected in the soil vapor beneath the basement of the former Sears building at levels that are above vapor intrusion screening levels for residential land use. However, the proposed redevelopment for the Project Site includes two-level subterranean parking which would mitigate the potential for vapor intrusion resulting from the soil vapor impacts beneath the Sears building.

Shallow soil exported off-site during Project Site grading is generally expected to meet acceptable criteria for non-hazardous waste characterization. Furthermore, the concentrations of VOCs reported in groundwater and soil vapor are low and not expected to drive further investigation or remediation, especially considering the redevelopment plans for a two-level parking garage across the footprint of the Project Site.

No CRECs or HRECs were identified for the Project Site.[118] According to available historical sources, the built date of the existing structure on the Project Site is 1928, indicating that asbestos-containing materials (ACM) and lead-based paint may be present. According to the U.S. Environmental Protection Agency (USEPA), ACM that is intact and in good condition can, in general, be managed safely in-place under an Operations and Maintenance (O&M) Program until removal is dictated by renovation, demolition, or deteriorating material condition. Further, all demolition, transport, and disposal of known and suspected asbestos would be required to adhere to the regulations established in the California Code of Regulations, Title 8, Section 341.6(c), Code of Federal Regulations, Title 29, Section 1926.1101(b), Code of Federal Regulations, Title 40, Part 61, Subpart M, and SCAQMD Rule 1403. Demolition, transport, and disposal of known and suspected lead-based paint would be required to adhere to the regulations established in the Code of Federal Regulations, Title 24, Section 35.86; Code of Federal Regulations, Title 40, Section 745.103; Code of Federal Regulations, Title 29, Section 1926.62; and California Code of Regulations, Title 8, Section 1532.1. Adherence to the regulations and procedures would ensure

118 Partner Engineering and Science, Inc., Phase I Environmental Site Assessment Report, Vacant Sear and Two Vacant Parcels, 5601-5643 Santa Monica Boulevard and 5544, 5545 Virginia Avenue, Los Angeles, California, 90038, October 23, 2020. Refer to Appendix G.1.

that all ACM and lead-based paint would be remediated and disposed of in accordance with federal, state, and local regulations.

Radon is a colorless, odorless, naturally occurring, radioactive, inert, gaseous element formed by radioactive decay of radium atoms. The USEPA has prepared a map to assist federal, state, and local organizations to target their resources and to implement radon-resistant building codes. Review of the USEPA Map of Radon Zones places the Project Site in Zone 2, Moderate. Based upon the radon zone classification, radon is not considered to be a significant environmental concern.

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

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

Less Than Significant Impact. The closest existing school is the West Santa Monica Boulevard Community Charter School which is located 0.2 mile southwest of the Project Site. As stated in Section IX(a), above, the Project would store, sell, and use, at most, minimal amounts of hazardous materials such as typical cleaning solvents used for janitorial purposes. As discussed above, the types and amounts of hazardous materials that would be used in connection with construction of the Project would be typical of those used during construction of studio campus developments and would include vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the Project would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations including, but not limited to, federal and state Occupational Safety and Health Act requirements, and local regulations for the storage, use, transport, and disposal of hazardous materials. As a result, use of these materials would not create a significant hazard to nearby schools. Furthermore, the school would be generally shielded from the Project Site by its distance from the Project Site, intervening urban buildings, and standard construction walls and sheeting to reduce dust and other emissions from the Project Site. **Therefore, impacts would be less than significant and no mitigation measures are required**.

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

Less Than Significant Impact. California Government Code Section 65962.5 requires the California Environmental Protection Agency to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While Section 65962.5 makes reference to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of multiple agencies. The ESA prepared for the Project (see Appendix G.1), included a records search of multiple federal, state, and local environmental databases was completed by Environmental Data Resources, Inc (EDR). As a follow-up to the database search, regulatory

information was reviewed for facilities within the specified search radii that were interpreted to have the potential to impact the Project Site, based on one or more factors (e.g., distance, open case status, up-gradient location, soil vapor migration). The following is a summary of the regulatory information obtained from review of online sources (e.g., state Water Resources Control Board (SWRCB) GeoTracker database, Department of Toxic Substances Control (DTSC) Envirostor database) and/or files requested from the applicable regulatory agency, as described below. The Project Site is identified as an EDR Historical Auto, a Statewide Environmental Evaluation and Planning System (SWEEPS) UST, a Hazardous Substance Storage Container Database (HIST UST), a California Facility Inventory Database (CA FID) UST, an UST, a Resource Conservation and Recovery Act (RCRA) Small Quantity Hazardous Waste Generator (SQG), a Hazardous Materials Reporting Facility (HAZMAT), a Facility and Manifest Data (HAZNET), a Hazardous Waste Tracking System (HWTS), a Facility Index System/Facility Registry System (FINDS), an Enforcement and Compliance History Information (ECHO), a National Pollutant Discharge Elimination System (NPDES), and a California Integrated Water Quality System (CIWQS) site in the regulatory database report, as discussed below:

- The Project Site is identified as Sears Roebuck and Co. and St Andrews Santa Monica at 5601 and 5667 West Santa Monica Boulevard is identified as a generator of hazardous and regulated wastes. The transporter is generally reported as Safety Kleen for removal of the generated wastes for off-site disposal under manifest. The generated wastes are consistent with typical vehicle repair and servicing operations. The most recent record indicates the facility was listed as inactive as of June 1, 2019. Asbestos disposal records are reported in 2011 and 2012.

- The Project Site is identified as a UST and Historical UST, and EDR Historical Auto site as Sears Roebuck and Co at 5601 Santa Monica as of 1985; untitled facility at 5603 and 5657 Santa Monica (reported as Sears Auto Center); Marony Omara at 5615 Santa Monica (auto service station in 1942); JW Colvin at 5673 Santa Monica (reported as a gasoline service station in 1929); AS Gaylord at 5617 Santa Monica is reported as an auto repair facility in 1924; and Green Hornet Santa Monica at 5601 Santa Barbara as of 2009. Green Hornet listings also are referenced as Columbia Pictures and appear to be for studio rental of the lot and/or building for filming in the last 13 years. As discussed previously in Question IX(b), the previous ESA found three AOC's at the Project Site: the laundromat, the 5667 West Santa Monica Boulevard automotive service and repair facility, and the 5616 West Santa Monica Boulevard automotive repair facility with are considered REC's. In addition, the current ESA found two additional AOCs which include the former gasoline station at 5673 West Santa Monica Boulevard and a former battery and lube oil facility that were not addressed as part of the prior subsurface investigation. These facilities are also considered RECs.

- One 100-gallon waste oil tank is reported as registered to Sears Roebuck & Co Auto Center at 5601 West Santa Monica Boulevard as reported by Los Angeles Fire Department (LAFD). Additionally, an UST of unreported size or contents was identified in the regulatory database report at the historical Project Site address of 5657 West Santa Monica Boulevard, within the southwestern portion of the Project Site. No documentation

pertaining to the removal and closure of these former USTs was identified. As such, the current presence or absence of the USTs and associated impacts to the subsurface are unknown and the USTs are considered a REC.

- The FINDS and ECHO listings (Hollywood Marketplace: 5601-5667 West Santa Monica Boulevard are associated with the disposal records and the NPDES and CIWQS listings are reported as associated with recent (2017) monitoring of stormwater runoff prevention during construction activities for 5601 and 5667 West Santa Monica Boulevard. One violation for failure to submit a quarterly reported was issued in 2017. No other violations or releases are reported. Based on the nature of the permit, these listings are not considered a REC.

As previously discussed in Question IX(b), ESA recommended that a Phase II investigation including a GPR or similar geophysical survey should be conducted to determine whether UST(s) remain on-site, and whether there is evidence of associated impact to the Project Site. The Phase II soil investigations reported low concentrations of TPH, VOCs, and metals in the shallow soil. The concentrations reported were below regulatory action levels. With regards to soil disposal and planning for Project Site grading, additional STLC analysis was conducted for chromium and lead. STLC soil analytical results demonstrate the chromium and lead detected in the composite samples does not fall under hazardous waste classification. Furthermore, low concentrations of PCE were detected in groundwater both historically and during the Phase II investigation. The concentrations were very low and not at levels that would require active remediation in groundwater. Concentrations of VOCs were detected in the soil vapor beneath the basement of the former Sears building at levels that are above vapor intrusion screening levels for residential land use. The proposed redevelopment for the Project Site includes two-level subterranean parking which would mitigate the potential for vapor intrusion resulting from the soil vapor impacts beneath the Sears building.

In conclusion, although the Project Site is included on a list of hazardous waste sites compiled pursuant to Section 65962.5 of the Government Code, construction and operation of the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard to the public or the environment based on the analysis presented above. **Therefore, impacts would be less than significant and no mitigation measures are required**.

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

No Impact. The Project Site is located approximately 8.9 miles south of the Hollywood-Burbank Airport (2627 North Hollywood Way). However, the Project Site is not located within the Planning Boundary/Influence Area of the Hollywood-Burbank Airport including within the Runway Protection Zone or Airport Land Use Plan Noise Contour, which establishes the area susceptible to noise levels that would exceed the annoyance threshold for noise (defined as >65 Community

Noise Exposure (CNEL) for commercial airports such as the Hollywood-Burbank Airport).[119] **Therefore, no impacts would occur and no mitigation measures are required.**

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

Less Than Significant Impact. According to the Safety Element of the City of Los Angeles General Plan, the nearest disaster route to the Project Site is West Santa Monica Boulevard, which is located adjacent to the Project Site and the US-101, which is located less than 0.5 miles east of the Project Site. In addition, the Project Site is located 0.8 mile northwest of the nearest fire station, Fire Station 52, located at 4957 Melrose Avenue. While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site Project-related construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. The Project would coordinate with the Los Angeles Police Department (LAPD) and LAFD to address any potential construction related impacts on access to and from the nearby LAPD and LAFD stations. Accordingly, the Project construction would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan. Impacts would be less than significant, and no mitigation measures are required.

Operation of the Project would generate traffic in the Project Site and would result in some modifications to site access. However, the Project would comply with LAFD access requirements and would not impede emergency access in the vicinity of the Project Site. Furthermore, as discussed above, the closest disaster routes include the adjacent West Santa Monica Boulevard and the US-101, which is within 0.5 miles of the Project Site. Thus, the Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan. **Therefore, impacts would be less than significant and no mitigation measures are required**.

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

No Impact. The Project Site is not located in a Very High Fire Hazard Severity Zone;[120] nor is the Project Site within a wildland fire hazard area.[121] In addition, the Project Site is located in a highly urbanized area of the City, and does not include wildlands or high fire hazard terrain or vegetation. Furthermore, the Project would be developed in accordance with LAMC and LAFD requirements

119 Los Angeles County, Airport Land Use Commission, Burbank/Glendale/Pasadena Airport, Airport Influence Area Map, May 13, 2003, website: https://planning.lacounty.gov/assets/upl/project/aluc_airport-burbank.pdf, accessed September 2021.

120 City of Los Angeles Department of City Planning, Zone Information & Map Access System, http://zimas.lacity.org/, accessed September 2021.

121 City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles, Adopted November 1996, https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed September 2021.

pertaining to fire safety. **Therefore, no impacts would occur and no mitigation measures are required.**

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
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; or1	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☒	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

The following analysis is based on the Hydrology & Water Quality Technical Report prepared by KPFF, Inc., dated April 2023. All specific information on hydrologic conditions in the discussion below is from this report unless otherwise noted. The Hydrology & Water Quality Technical Report is included as Appendix H of this IS/MND.

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact.

Surface Water Quality

Construction

During Project construction, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. However, in accordance with the requirements of the NPDES Construction General Permit, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) adhering to the California Stormwater Quality Association Best Management Practices (BMP) Handbook.

Construction BMPs for the Project would be designed and maintained as part of the implementation of the SWPPP in compliance with the Construction General Permit. The SWPPP must begin when construction commences, before any site clearing and grubbing or demolition activity. During construction, the SWPPP would be referred to regularly and amended as changes occur throughout the construction process. The Notice of Intent (NOI), Amendments to the SWPPP, Annual Reports, Rain Event Action Plans (REAPs), and Non-Compliance Reporting must be posted to the state's SMARTS website in compliance with the requirements of the Construction General Permit.

The SWPPP would set forth BMPs to be used during construction for stormwater and non-stormwater discharges, including, but not limited to erosion control and sediment control with sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion.

As discussed in Section 3, Project Description, of this IS/MND, below-grade parking would extend to a depth of approximately 30 to 40 feet. As described in the Geotechnical Engineering Investigation Report by Geotechnologies, Inc. (Geotechnical Report), groundwater was encountered during exploration at depths of 32.2 feet below the ground surface, which relates to elevations 296.3 feet above mean sea level.[122] According to the Geotechnical Report, the Seismic Hazard Zone Report by the California Geological Survey indicated the historically highest groundwater level in the area is roughly 20 feet beneath the ground surface, which relates to 308.5 feet.[123]

[122] Geotechnical Engineering Investigation – Proposed Commercial Development – 5601 Santa Monica Boulevard, Los Angeles, California, Updated March 3, 2022.

[123] Ibid.

Considering the historic high groundwater level at a depth of roughly 20 feet, and the depth of the proposed lowest level basement being 30.8 feet, groundwater would likely be encountered during construction. It is not uncommon for groundwater levels to vary seasonally or for groundwater seepage conditions to develop where none previously existed, especially in impermeable fine-grained soils which are heavily irrigated or after seasonal rainfall. Thus, Project construction activities are expected to encounter groundwater which could require temporary pumps and filtration. Dewatering operations are practices that discharge non-stormwater, such as groundwater, that must be removed from a work location and discharged into the storm drain system to proceed with construction. Discharges from dewatering operations can contain high levels of fine sediments, which, if not properly treated, could lead to exceedance of the NPDES requirements. If groundwater were to be encountered during construction, temporary pumps and filtration would be utilized incompliance with all relevant NPDES requirements related to construction and discharges from dewatering operations pursuant to the LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, LARWQCB Order No. R4-2018-0125 ("Dewatering Permit").[124]

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

Operation

The Project Site would not increase concentrations of the items listed as constituents of concern for the Ballona Creek Watershed.

Due to the incorporation of the required LID BMP(s)[125], operation of the Project would not result in discharges that would cause: (1) pollution which would alter the quality of the waters of the state (i.e., Ballona Creek) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the waters of the state by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; or occurs during or as a result of the treatment or disposal of wastes.

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124 LARWQCB Order No. R4-2018-0125, www.waterboards.ca.gov/losangeles/board_decisions/adopted_orders/general_orders/r4-2018-0125/OrderNoR4-2018-0125(Order).pdf, accessed August 11, 2021.

125 City of Los Angeles, Sanitation Department, Planning and Land Development Handbook for Low Impact Development, May 9, 2016, https://www.lacitysan.org/cs/groups/sg_sw/documents/document/y250/mde3/~edisp/cnt017152.pdf, accessed August 11, 2021.

As is typical of most urban developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. The Project would not have an adverse impact on water quality, and would in fact improve the quality of on-site flows, due to the introduction of new BMPs that would collect, treat, and discharge flows from the Project Site (which are not being treated under existing conditions). Also, both the Project and other future development projects would be subject to LID requirements and implementation of measures to comply with Total Maximum Daily Loads (TMDLs).

Furthermore, operation of the Project would not result in discharges that would cause regulatory standards to be violated. The existing Project Site is approximately 100 percent impervious. Under the Project, a portion of the Project Site would be allocated for stormwater BMPs specifically intended to control and treat stormwater runoff in compliance with LID requirements. As stated above, it appears that stormwater runoff from the Project Site in its existing condition ultimately discharges into the Santa Monica Boulevard storm drain main via roof downspouts and sheet flow. The Project would include the installation of LID BMPs, which would mitigate at minimum the first flush or the equivalent of the greater between the 85th percentile storm and first 0.75-inch of rainfall for any storm event. The installed BMP systems would be designed with an internal bypass or overflow system to prevent upstream flooding due to large storm events. The stormwater which bypasses the BMP systems would discharge to an approved discharge point in the public right-of-way. As such, the Project would not interfere with the implementation of a water quality control plan. **Therefore, with the implementation of the SWPPP and LID BMPs, there will be no operational impacts on surface water quality, and no mitigation measures are required.**

Groundwater Quality

Construction

As discussed above, the Project would include excavations for the Project's subterranean parking. The Project would also result in a net export of approximately 251,000 cubic yards of soil. Although not anticipated at the Project Site, any contaminated soils or USTs found would be captured within that volume of excavated material, removed from the Project Site, and remediated at an approved disposal facility in accordance with regulatory requirements.

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

be anticipated to affect such existing wells.[126] Therefore, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade groundwater quality. As construction activities are not expected to encounter existing groundwater supplies, those activities would not conflict with the implementation of a sustainable groundwater management plan. **Therefore, impacts on groundwater quality would be less than significant and no mitigation measures would be required.**

Operation

The Project does not include the installation or operation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility. Generally, operational activities which could affect groundwater quality include spills of hazardous materials and leaking underground storage tanks. As discussed above in Section IX, Hazards and Hazardous Materials, above, no USTs are currently operated at the Project Site or would be operated by the Project. Moreover, the Project would be required to comply with applicable regulatory requirements to further ensure that the minimal amount of hazardous materials associated with the Project are properly treated and disposed of at licensed resource recovery facilities or hazardous waste landfills. In addition, the Project would comply with all applicable regulations regarding the handling and potentially required cleanup of hazardous materials as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Furthermore, operation of the Project would not require extraction from the groundwater supply because the subterranean walls would be designed to withstand hydrostatic pressure and permanent dewatering would not be required. The Project is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation because, as discussed further below, the Project Site would not be a significant source of groundwater recharge. Furthermore, as described above, operation of the Project would not require extraction from the groundwater supply based on the depth of excavation for the proposed uses and the depth of groundwater below the Project Site.

The Project is not anticipated to result in violations of any water quality standards or waste discharge requirements or otherwise substantially degrade groundwater quality. Additionally, the Project would not involve drilling to or through a clean or contaminated aquifer. **Therefore, the Project's potential impact on groundwater recharge is less than significant and no mitigation measures are required**.

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

Less Than Significant Impact. As discussed above, based on the historically highest groundwater level and depth of proposed excavation, Project construction activities could encounter groundwater and temporary pumps and filtration may be required. If groundwater were to be encountered during construction, temporary pumps and filtration would be utilized in compliance all applicable regulations and requirements, including with all relevant NPDES

[126] Los Angeles County, Public Works, Groundwater Wells website: https://dpw.lacounty.gov/general/wells/, accessed May 19, 2022.

requirements related to construction and discharges from dewatering operations. Any required dewatering would be temporary and cease when construction is complete. Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.

With regard to groundwater recharge, the percolation of precipitation that falls on pervious surfaces is variable, depending on the soil type, condition of the soil, vegetative cover, and other factors. The Project Site is comprised of approximately 100 percent impervious surfaces under existing conditions. The Project would neither increase or decrease the imperviousness of the Project Site. Therefore, the Project would not interfere substantially with groundwater recharge such that groundwater management would be impeded. Based on the above, the Project would not substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in the aquifer volume or lowering of the local groundwater table level. **Therefore, impacts would be less than significant and no mitigation measures are required**.

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

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

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

The Project Site is comprised of approximately 100 percent impervious surfaces under existing conditions. As discussed above, the Project would neither increase or decrease the imperviousness of the Project Site. Similar to existing conditions, no erosion or siltation would occur. Therefore, the drainage pattern would be the same as the existing Project Site, post construction. The Project would not alter the existing drainage pattern of the

Project Site or the surrounding area such that substantial erosion or siltation on-site or off-site would occur. **Therefore, impacts would be less than significant and no mitigation measures are required**.

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

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

The Project Site is comprised of approximately 100 percent impervious surfaces under existing conditions. The Project would neither increase or decrease the imperviousness of the Project Site and would not change infiltration into the groundwater and runoff volumes into the existing storm drain system.

In the existing condition, stormwater runoff is discharged into offsite storm drainage catch basins and underground storm drainage pipes, which convey stormwater through various underground pipe networks into Ballona Creek. Under the Project, all drains would feed into four separate rainwater harvesting cisterns on located on Parking Levels 2 and 3. Their approximately 10,000-gallon capacity would be used entirely for irrigation of the on-site landscaping. Any stormwater runoff that is not captured by the drains and cisterns would discharge into to the public storm drain system, similar to the existing conditions.

As discussed further below, the Project Site is not located in a flood zone. Therefore, the Project would not cause flooding during a 50-year storm event on the Project Site. The stormwater infrastructure located in West Santa Monica Boulevard and North Wilton Place has sufficient capacity to accept the stormwater runoff from the existing conditions and since there would be no increase in flow rates, infrastructure would have sufficient capacity to handle post-Project flows. Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that on-site or off-site flooding would occur. **Operational impacts would be less than significant and no mitigation measures are required**.

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

Less Than Significant Impact. As stated above in Section X(ii), the Project Site is comprised of approximately 100 percent impervious surfaces under existing conditions.

The Project would neither increase or decrease the imperviousness of the Project Site and would not change infiltration into the groundwater and runoff volumes into the existing storm drain system. Furthermore, stormwater runoff from the Project Site would be collected into four separate rainwater harvesting cisterns on located on Parking Levels 2 and 3. Any stormwater runoff that is not captured by the drains and cisterns would discharge into to the public storm drain system, similar to the existing conditions. Therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. **Therefore, impacts would be less than significant and no mitigation measures are required**.

iv. Impede or redirect flood flows?

Less Than Significant Impact. According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map, the Project Site is within Zone X, which is a designation for areas determined to have a minimal flood hazard.[127] No streams or rivers that may overflow or breech a levee are located on or near the Project Site and the Project Site is not located within any high-risk coastal areas.

The Los Angeles County General Plan Safety Element indicates that the Project Site is located within the inundation area boundaries of the Hollywood Reservoir and Mulholland Dam.[128] However, t this reservoir, as well as others in California, are continually monitored by various governmental agencies (such as the state of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum considered earthquake for the site as well as other conditions that could undermine the integrity of the dam. Pursuant to these regulations, the Mulholland Dam is regularly inspected and meets current safety regulations. In addition, the Los Angeles Department of Water and Power (LADWP) has emergency response plans to address any potential impacts to its dams. Given the oversight by the

127 Federal Emergency Management Agency, Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 060137 and 06037C1610F, effective September 2008, https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd&extent=-118.32363358491081,34.086364669197664,-118.30286255829891,34.09524975771773, accessed September 2021.

128 County of Los Angeles Department of Regional Planning, Los Angeles County General Plan Safety Element, Exhibit G: Inundation and Tsunami Hazard Areas, December 1990, https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed September 2021.

Division of Safety of Dams, including regular inspections, and the LADWP's emergency response program, the potential for substantial adverse impacts related to inundation at the Project Site as a result of dam failure would be less than significant. **Therefore, impacts would be less than significant and no mitigation measures are required**.

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

Less Than Significant Impact. As discussed in Question X(civ), the Project Site is within Zone X, which is a designation for areas determined to have a minimal flood hazard.[129] Additionally, the Project Site is over 12 miles from the Pacific Ocean and not within an area potentially impacted by a tsunami.[130] There are also no major water bodies in the vicinity of the Project Site that would put the Project Site at risk of inundation by seiche.

As previously discussed, the Los Angeles County General Plan Safety Element indicates that the Project Site is located within the inundation area boundaries of the Hollywood Reservoir.[131] However, for the reasons explained above, inundation of the Project Site resulting from dam failure is highly unlikely. **Therefore, impacts would be less than significant and no mitigation measures are required**.

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

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

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129 Federal Emergency Management Agency, Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 060137 and 06037C1610F, effective September 2008, https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd&extent=-118.32363358491081,34.086364669197664,-118.30286255829891,34.09524975771773, accessed September 2021.

130 California Department of Conservation, Los Angeles County Tsunami Inundation Maps, https://www.conservation.ca.gov/cgs/tsunami/maps, accessed September 2021.

131 County of Los Angeles Department of Regional Planning, Los Angeles County General Plan Safety Element, Exhibit G: Inundation and Tsunami Hazard Areas, December 1990, https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed September 2021.

Creek EWMP and ultimately discharges the Pacific Ocean at the Santa Monica Bay. According to the SWRCB, Ballona Creek, is listed as an impaired water body. Impairments for Ballona Creek include trash, toxic pollutants, bacteria, metals, and sediment.[132] Potential pollutants generated by the Project would be typical of office, restaurant and production studio land uses and may include sediment, nutrients, pesticides, pathogens, trash and debris, oil and grease, and metals. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. As such, with the implementation of the City's LID Ordinance BMPS, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans for Ballona Creek. In addition, stormwater runoff from the Project Site would be collected into four separate rainwater harvesting cisterns located on Parking Levels 2 and 3. Any stormwater runoff that is not captured by the drains and cisterns would discharge into to the public storm drain system, similar to the existing conditions. With compliance with existing regulatory requirements and implementation of City's LID Ordinance BMPS, the Project would not conflict with or obstruct implementation of a water quality control plan. **Therefore, impacts would be less than significant and no mitigation measures are required**.

XI. LAND USE AND PLANNING

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

a. Physically divide an established community?

Less Than Significant Impact. The Project Site is located at 5601 - 5673 West Santa Monica Boulevard, 5612 – 5672 West Virginia Avenue, and 1110 - 1118 North Wilton Place, and is bounded by West Santa Monica Boulevard and commercial uses to the south; North Saint Andrews Place, commercial uses, and a vacant lot to the east; North Wilton Place, residential uses and commercial uses to the west; and West Virginia Avenue and residential uses to the north.

The 225,456-square-foot Project Site is currently improved with a surface parking lot and the former three-story Sears building originally constructed in 1928 and consisting of approximately 98,352 square feet. The Project Site does not include any roadways or access to other streets or

[132] City of Los Angeles, LA Sanitation Environmental, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-wp-ewmp-bc?_adf.ctrl-state=1b5g1ogp8s_82&_afrLoop=4667529865967099#!, accessed May 19, 2022.

properties. The Project Site is surrounded by other development and there are no existing residences on the site, or a residential use that would be physically separated or otherwise disrupted by the Project. Development of the Project would remain within the boundaries of the existing Project Site and would result in further infill of an already developed community. The Project would not disrupt, divide, or isolate an existing neighborhood or community directly or indirectly, as all proposed improvements would occur within the limits of the Project Site. **Therefore, impacts would be less than significant and no mitigation measures are required**.

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

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the project site and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate.

Applicable Land Use Policies and Regulations

The following describes the primary regulatory requirements applicable to the Project regarding land use and planning. Applicable plans and regulatory documents/requirements include the following:

- Southern California Association of Governments 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles General Plan
- Hollywood Community Plan
- Los Angeles Municipal Code
- Hollywood Redevelopment Project Area
- Citywide Design Guidelines
- Transit Priority Area

An overview of each of these plans and regulations is provided below. However, not every policy or goal of these plans is intended to mitigate or avoid environmental impacts. Where a policy is not intended to mitigate or avoid an environmental impact, consistency with that policy may not be relevant to an environmental impact analysis.

Consistency with Regional Plans

Southern California Association of Governments/Regional Transportation Plan

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal.[133] The 2020-2045 RTP/SCS presents a long-term

133 Southern California Association of Governments, 2020-2045 RTP/SCS, September 2022, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176, accessed November 2022.

transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 2020-2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, and the provision of services by other regional agencies. SCAG's overarching strategy for achieving its goals is integrating land use and transportation. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles traveled and improvements to the transportation system. Rooted in past RTP/SCS plans, Connect SoCal's "Core Vision" centers on maintaining and better managing the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets.[134] The plan's "Key Connections" augment the "Core Vision" to address challenges related to the intensification of core planning strategies and increasingly aggressive GHG reduction goals, and include but are not limited to, Housing Supportive Infrastructure, Go Zones, and Shared Mobility.[135] Connect SoCal intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions' overall quality of life.[136] These benefits include but are not limited to a five percent reduction in VMT per capita and vehicle miles traveled by nine percent, increase in work-related transit trips by two percent, create more than 264,500 new jobs, reduce greenfield development by 29 percent, and, building off of the 2016-2040 RTP/SCS, increase the share of new regional household growth occurring in High Quality Transit Areas (HQTA's)[137] by six percent and the share of new job growth in HQTAs by 15 percent.[138]

Conflicts and consistency of the Project with the RTP/SCS are addressed in Table 4.7, *Applicable Goals and Strategies of 2020-2045 RTP/SCS*, below. Based on the analysis presented in Table 4.7, the Project would not be in conflict with applicable 2020-2045 RTP/SCS goals and strategies. The Project Site is located in an area well-served by public transit. Specifically, there is a Metro bus stop on West Santa Monica Boulevard in front of the Project Site, for westbound travel, and across the street for eastbound travel, approximately 292 feet south of the Site, for Metro Route 4, and a Metro bus stop on Western Avenue at Western Avenue/Santa Monica Boulevard, approximately 2,000 feet southeast of the Site, for Metro Route 207. The Project Site is also

134 Southern California Association of Governments, 2020-2045 RTP/SCS, September 2022, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176, accessed November 2022. Page 46.

135 Southern California Association of Governments, 2020-2045 RTP/SCS, September 2022, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176, accessed November 2022. Page 47.

136 Southern California Association of Governments, 2020-2045 RTP/SCS, September 2022, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176. accessed November 2022. Page 3.

137 HQTAs are corridor-focused areas within 0.5 mile of an existing or planned transit stop or a bus transit corridor with a 15-minutes or less service frequency during peak commuting hours.

138 Southern California Association of Governments, 2020-2045 RTP/SCS, September 2022, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176, accessed November 2022. Page 145.

Table 4.7
Applicable Goals and Strategies of 2020-2045 RTP/SCS

Goals and Strategies	Would the Project Conflict?
G1: Encourage regional economic prosperity and global competitiveness.	**No conflict.** Although this goal is a plan-level goal, the Project would provide a wide variety of skilled and unskilled jobs, both high-wage and entry-level employment opportunities and career growth opportunities with potential benefits for the regional economy. Furthermore, the Project Site is adjacent to several rapid Metro bus lines and within 1.0 mile of the Metro Hollywood/Western B Line transit station. The location of the Project Site within walking distance to a transit station and served by several bus lines would provide a broad geographic range in which employees could travel without requiring long vehicle commutes. As such, the Project encourages multi-modal travel, prosperity and global competitiveness.
G2: Improve mobility, accessibility, reliability, and travel safety for people and goods.	**No conflict.** The Project is an infill development within the Hollywood area. Metro runs several rapid bus lines along West Santa Monica Boulevard and Western Avenue in the area and is within 1.0 mile of the Metro Hollywood/Western B Line transit station. Given the Project Site's location in proximity to a variety of transportation options and the infill nature of the Project, the Project would maximize the potential for mobility and accessibility for Project employees and visitors.
G3: Enhance the preservation, security, and resilience of the regional transportation system.	**No conflict.** Although this goal is a plan-level goal, the Project would be consistent with this goal by providing additional a commercial use within walking distance of several rapid bus lines along West Santa Monica Boulevard and Western Avenue in the area and is within 1.0 mile of the Metro Hollywood/Western B Line transit station. The transit opportunities provide future Project employees and visitors with reliable and safe transportation and, in turn, the Project's employees and visitors provide the regional transportation system with riders.
G4: Increase person and goods movement and travel choices within the transportation system.	**No conflict.** The Project is an infill development within the Hollywood area. Metro runs several rapid bus lines along West Santa Monica Boulevard and Western Avenue in the area and is within 1.0 mile of the Metro Hollywood/Western B Line transit station. Thus, the Project would create additional employment opportunities located in proximity to a variety of transportation options and additional ridership to the transportation system.
G5: Reduce greenhouse gas emissions and improve air quality.	**No conflict.** The Project Site is located proximate to multiple transit options, thereby reducing vehicle emissions, and the Project would incorporate building technologies and design features that would save energy (which would also reduce air emissions associated with electricity generation), all of which would reduce the Project's GHG emissions. The Project would encourage active transportation by its

Table 4.7
Applicable Goals and Strategies of 2020-2045 RTP/SCS

Goals and Strategies	Would the Project Conflict?
	location near several rapid Metro bus lines along West Santa Monica Boulevard and Western Avenue in the area and within 1.0 mile of the Metro Hollywood/Western B Line transit station. The Project would also provide long- and short-term bicycle parking spaces in accordance with the City Bicycle Ordinance. Therefore, the Project would reduce potential GHG emissions, improve air quality, and encourage bicycling and walking.
G6: Support healthy and equitable communities.	**No conflict.** Although this goal is a plan-level goal, the Project would be consistent with this goal by providing increased employment opportunities and bicycling amenities in an urbanized area well-served by transit, and within bicycling and walking distance of commercial uses. The Project is comprised of a building with interconnected uses building on a walkable campus, with approximately 109,957 square feet of production studios and related support space, 388,286 square feet of creative office, and 12,378 square feet of restaurant space. The Project is located proximate to transit options, thereby reducing vehicle emissions, and would incorporate building technologies and design features that would save energy (which would also reduce air emissions associated with electricity generation).
G7: Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**No conflict.** Although this goal is a plan-level goal, the Project would be consistent with this goal. As detailed in Section 3, Project Description, of this IS/MND, the Project would comply with the 2020 Los Angeles Green Building Code (LAGBC), which requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The Project would enhance energy-efficiency via high-performance glazing as well as enhanced façade, roof and deck insulation values. The air conditioning system would be comprised of highly efficient Variable Refrigerant Flow (VRF) systems allowing for minimal electrical consumption, particularly when the building is lightly occupied. The tower roofs would be engineered with appropriate structural loads and provided with infrastructure to accommodate large solar photovoltaic arrays to generate electricity on-site through a renewable source. Indoor water usage would be minimized via the use of ultra-low flow plumbing fixtures installed throughout the Project and the irrigation system would be designed to meet or exceed the state Model Water Efficient Landscape Ordinance (MWELO). Furthermore, the on-site drop-off areas on the ground floor would encourage ridesharing and carpooling, while the on-site parking

Table 4.7
Applicable Goals and Strategies of 2020-2045 RTP/SCS

Goals and Strategies	Would the Project Conflict?
	would include preferential parking for electric and low-emitting vehicles. The Project would also meet or exceed code required electric vehicle charging stations. The Project Site is also located near multiple transit options and provides the required number of bicycle spaces and amenities and, as such, encourages multimodal travel, which reduces air pollutant emissions from vehicles. The Project's energy efficiency measures and reductions in vehicle miles traveled and emissions result in reductions in GHG emissions.
Focus Growth Near Destinations & Mobility Options	
• Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.	**No conflict.** The Project would be consistent with this strategy by providing additional employment opportunities within walking distance of several rapid Metro bus lines along West Santa Monica Boulevard and Western Avenue and the Metro Hollywood/Western B Line transit station. The transit opportunities would provide future Project employees and visitors with reliable and safe transportation. The Project would provide long- and short-term bicycle parking spaces in accordance with the City Bicycle Ordinance. Therefore, the Project would encourage bicycling to work and other destinations. Thus, the Project would create additional employment opportunities located in proximity to a variety of transportation options that facilitate access to work, educational, and other destinations.
• Focus on regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center -focused main streets.	**No conflict.** The Project would be consistent with this strategy by providing additional employment opportunities within walking distance of several rapid Metro bus lines along West Santa Monica Boulevard and Western Avenue and the Metro Hollywood/Western B Line transit station. The transit opportunities would provide future Project residents with reliable and safe transportation. The Project is comprised of a building with interconnected uses on a walkable campus, with approximately 109,957 square feet of production studios and related support space, 388,286 square feet of creative office, and 12,378 square feet of restaurant space, thereby contributing to the diversity of employment choices in the area. The Project would be located adjacent to commercial, and transit uses and would reduce commute distances by providing jobs near transit uses.
• Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and	**No conflict.** The Project would be consistent with this strategy by replacing a large surface parking lot and vacant building with approximately 109,957 square

Table 4.7
Applicable Goals and Strategies of 2020-2045 RTP/SCS

Goals and Strategies	Would the Project Conflict?
connectivity in existing neighborhoods.	feet of production studios and related support space, 388,286 square feet of creative office, and 12,378 square feet of restaurant space near several public transit options, which would reduce employee and visitor vehicle trips, vehicle miles traveled, and resulting air pollution and GHG emissions. In addition, the Project encourages active transportation by including 162 bicycle parking stalls and bike amenities, such as showers and lockers within the Project Site.
Source: Southern California Association of Governments, Connect SoCal - The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, adopted for federal transportation conformity purposes only on May 7, 2020; EcoTierra Consulting, 2022.	

located within walking distance of the Metro Hollywood/Western B Line Subway, located approximately 5,280 feet north of the Project Site. The Project would provide 106 long-term bicycle parking spaces and 56 short-term spaces, for a total of 162 bike parking spaces. The Project would create a pedestrian-friendly environment by providing landscaped walkways along all street frontages. The Project Site is located adjacent to a mature network of streets that include vehicular, pedestrian and bicycle facilities.

Given the Project Site's location in proximity to a variety of transportation options and the infill nature of the Project, the Project would maximize the potential for mobility and accessibility. Development of the Project within this established community would promote a variety of non-vehicular travel choices in the area. The Project would not conflict with RTP/SCS goals to maximize mobility and accessibility for all people and goods in the region, ensure travel safety and reliability, preserve and ensure a sustainable regional transportation system, protect the environment, encourage energy efficiency and facilitate the use of alternative modes of transportation, and the Project would not conflict with the RTP/SCS strategies to focus growth near destination and mobility options. Therefore, the Project would result in a less than significant impact as it would not conflict with the RTP/SCS.

Consistency with Local Plans

City of Los Angeles General Plan

The City of Los Angeles General Plan (General Plan)[139], originally adopted in 1974, sets forth goals, objectives, policies, and programs to provide an official guide to the future development of the City, while integrating a range of state-mandated elements,[140] including Land Use, Circulation (Mobility Plan 2035), Housing, Conservation, Open Space, Safety, Noise, and Air Quality. The

139 City of Los Angeles, Department of City Planning, City of Los Angeles General Plan, https://planning.lacity.org/plans-policies/general-plan-overview, accessed August 11, 2022.

140 The term "element" refers to the topics that California law requires to be covered in a general plan (Government Code Section 65302). In addition, state law permits the inclusion of optional elements which address needs, objectives or requirements particular to that city or county (Government Code Section 65303).

City's General Plan also includes the Framework Element, the Health and Wellness Element (Plan for a Healthy Los Angeles), the Infrastructure Systems Element, and the Public Facilities & Services Element. Both the City's General Plan land use controls and the goals, objectives, and policies within individual elements of the General Plan include numerous provisions that are intended to avoid or reduce potential adverse effects on the environment. The elements that make up the City's General Plan are described in more detail below.

City of Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (General Plan Framework) sets forth a Citywide comprehensive long-range growth strategy and establishes Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. The General Plan Framework provides guidelines for future updates of the City's community plans but does not supersede the more detailed community and specific plans.

Land Use Chapter

The General Plan Framework Land Use Chapter designates Districts (i.e., Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, and Mixed-Use Boulevards) and provides standards and policies that shape the scale and intensity of proposed uses within those districts, with the purpose of supporting the vitality of the City's residential neighborhoods and commercial districts. The establishment of the designated arrangement of land uses and development densities addresses an array of environmental issues, including, but not limited to: reductions in VMT, reductions in noise impacts, improved efficiency in the use of energy, improved efficiency and thus greater service levels within the infrastructure systems, availability of open space, compatibility of land uses, support for alternative modes of transportation, and provision of an attractive pedestrian environment.

The Project Site has a Neighborhood Office Commercial land use designation and is located on a designated Mixed Use Boulevard.[141] Pursuant to this Framework Element, the intent of Mixed-Use Boulevard designation is to connect the City's neighborhood districts and community, regional and Downtown centers. Boulevards designed for Mixed Use are differentiated into sub-areas that may individually accommodate: (1) sites developed exclusively for commercial uses, (2) structures that integrate housing with commercial uses, (3) sites that contain a mix of free-standing commercial and housing, and (4) sites developed exclusively for multi-family housing. Overall, mixed-use development is encouraged along these boulevards, with the scale, density and height of development compatible with the surrounding areas. Generally, different types of development will fall within a range of floor area ratios from 1.5:1 up to 4.0:1 and will generally be characterized by one- to two-story commercial structures and up to three- to six-story mixed-use buildings between centers and higher buildings within centers. The determination of the locations in which such modifications may occur would normally occur as amendments to the community plans or other initiatives as provided for by the Los Angeles Municipal Code. The Framework

141 City of Los Angeles, The Citywide General Plan Framework Element, adopted December 11, 1996 and August 8, 2001, Figure 3-1, Long Range Land Use Diagram-Metro.

Element establishes guidelines to achieve higher quality development, such as design character, amenity, and open space.

The Project would not conflict with the policies and objectives of the Land Use Chapter by supporting the needs of the City's existing and future residents, businesses, and visitors for commercial land uses (Objective 3.1). Specifically, the Project is comprised of an interconnected walkable campus building with approximately 109,957 square feet of production studios and related support space, 388,286 square feet of creative office, and 12,378 square feet of restaurant space, thereby contributing to the diversity of employment choices in the area. In addition, development of the Project in an area with convenient access to public transit and opportunities for walking and biking would promote an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and resulting air pollutant and greenhouse gas emissions (Objective 3.2). Furthermore, the concentration of studio uses would support the Project area's existing range of services and activities and would be consistent with the Community Plan land use designation (Objective 3.4).

Urban Form and Neighborhood Design Chapter

The General Plan Framework Urban Form and Neighborhood Design Chapter establishes the goal of creating a city that is attractive to future investment and a city of interconnected, diverse neighborhoods that builds on the strength of those neighborhoods and functions at both the neighborhood and Citywide scales. The purpose of the Urban Form and Neighborhood Design Chapter is two-fold: first, to support the population distribution principles of the General Plan Framework through proper massing and design of buildings and second, to enhance the physical character of neighborhoods and communities within the City.[142] The General Plan Framework does not directly address the design of individual neighborhoods or communities, but embodies general neighborhood design and implementation programs that guide local planning efforts and lay a foundation for community plan updates. The Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service. The existing and planned transit system provides the opportunity to concentrate development and conserve the existing character of stable neighborhoods.

The Project Site, which is located along a designated Mixed-Use Boulevard, has direct access to several Metro rapid bus lines that run along West Santa Monica Boulevard and Western Avenue and is within 1.0 mile of the Metro Hollywood/Western B Line transit station (Objective 5.2). One of the key objectives of the Urban Form and Neighborhood Design Chapter is to enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm (Objective 5.5). The proposed building would be designed in a contemporary architectural style that would be compatible with the general urban characteristics of the surrounding neighborhood. The proposed commercial building would be moderated by a high degree of articulation, using both variations in building planes and façade setbacks, as well as a variety of materials, and would be designed to complement the surrounding neighborhood. The Project would also be designed to help promote personal safety at all times of day (Objective 5.9)

142 City of Los Angeles General Plan Framework, page 5-1, et. seq.

by the security features incorporated into the Project design to enhance safety. These features would include security cameras, as well as a well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment. Furthermore, during construction, the Project Site would be secured with perimeter fencing. During Project operations, security would be provided via site planning and secured access points of entry.

Open Space and Conservation Chapter

The General Plan Framework Open Space and Conservation Chapter provides guidance for overall City provision of open space and sets forth policies for the protection of the City's natural environment resources. The Open Space and Conservation Chapter's objectives are oriented around the conservation of natural resources, provision of outdoor recreational opportunities, minimization of public risks from environmental hazards, and use of open space to enhance community and neighborhood character. Economic, social, and ecological imperative require the City to take full advantage of all existing open space elements. The ecological dimension is based on the improvement of water quality and supply, the reduction of flood hazards, improved air quality, and the provision of ecological corridors for birds and wildlife.

The Project would not conflict with the Open Space and Conservation Chapter as it would provide 46,292 square feet of non-required private and common open space for the proposed office and studio tenants. This open space includes private terraces, common terraces, seating areas, and landscaping. Although not open to the public, this non-required open space would reduce the demand on local parks and other public open spaces that the Project might otherwise create.

Economic Development Chapter

The General Plan Framework Economic Development Chapter includes goals, policies and objectives that address the appropriate land use locations for development. The chapter also establishes mutual development objectives for land use and economic development. This Chapter set forth policies for the development of an infrastructure investment strategy to support population and employment growth areas. The Chapter also includes goals, objectives, and policies focused on preserving commercial uses within walking distance to residential areas, and promoting opportunities in areas where growth can be accommodated without encroaching on residential neighborhoods. It also focuses on establishing a balance of land uses that provide for commercial and industrial development which meet the needs of local residents, sustaining economic growth, and assuring maximum feasible environmental quality.

The Project would not conflict with the City's policies and objectives of the Economic Development Chapter. The Project would establish a balance of land uses that sustains economic growth and assures maximum feasible environmental quality by bringing new economic investment to the Hollywood area that is well served by existing transit (Objective 7.2). Furthermore, the Project would establish a studio use that would benefit existing businesses of the area (Policy 7.3).

Transportation Chapter

The General Plan Framework Transportation Chapter includes proposals for major improvements to enhance the movement of goods and to provide greater access to major intermodal facilities.

While the focus of the Transportation Chapter is on guidance for transportation investments, the Transportation Chapter also includes goals, policies and objectives that overlap with policies included in other Framework chapters of the General Plan Framework regarding land use patterns and the relationship of the pedestrian system to arrangement of land uses. The Transportation Chapter of the General Plan Framework is implemented through the General Plan's Mobility Plan 2035 (Mobility Plan), which is a comprehensive update of the General Plan Transportation Element.

The Project would not conflict with the City's policies and objectives of the Transportation Chapter. The Project would support an area targeted for commercial uses and a focal point of regional commerce identity and activity through the provision of studio, office and restaurant uses and employment opportunities for the Hollywood area. Furthermore, Metro runs several rapid bus lines along West Santa Monica Boulevard and Western Avenue in the area and is within 1.0 mile of the Metro Hollywood/Western B Line transit station. Thus, the Project would create additional employment opportunities located in proximity to a variety of transportation options and additional ridership to the transportation system (Objective 8.3).

Infrastructure and Public Services Chapter

The General Plan Framework Infrastructure and Public Services Chapter addresses infrastructure and public service systems, including wastewater, stormwater, water supply, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forests. For each of the public services and infrastructure systems, basic policies call for monitoring service demands and forecasting the future need for improvements, maintaining an adequate system/service to support the needs of population and employment growth, and implementing techniques that reduce demands on utility infrastructure or services. Generally, these techniques encompass a variety of conservation programs (e.g., reduced use of natural resources, increased site permeability, watershed management, and others). Strategic public investment is advocated in the Infrastructure and Public Services Chapter as a method to stimulate economic development as well as maintain environmental quality. Attention is also placed on the establishment of procedures for the maintenance and/or restoration of service after emergencies, including earthquakes.

The Project would not conflict with the City's policies and objectives of the Infrastructure and Public Services Chapter. The goals, objectives and policies found within this chapter of the Framework Element addresses 13 infrastructure and public service systems, many of which are interrelated. The applicable goals, objectives and policies have been separately analyzed in the following sections of this IS/MND, including Sections VI, Energy, XV. Public Services, and XIX. Utilities and Service Systems. The Project would not conflict with applicable goals, objectives, and policies of the Framework's Infrastructure and Public Services Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

The Project's consistency with applicable goals, objectives, and policies in the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below. A detailed list of the goals, objectives, and policies of the Framework Element applicable to the Project is included in Table 4.8 *Applicable Objectives and Policies of*

the General Plan Framework Element, along with a discussion of whether or not the Project does or does not conflict with that particular goal, objective, or policy. Therefore, the Project would result in a less than significant impact as it would not conflict with the General Plan Framework Element.

Table 4.8
Applicable Objectives and Policies of the
General Plan Framework Element

Objective/Policy	Would the Project Conflict?
Land Use Chapter	
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	**No conflict.** The Project would develop a mix of commercial land uses, thereby contributing to the diversity of land uses in the Hollywood area, which currently includes multiple other commercial, residential, retail, restaurant, and entertainment land uses. The Project would be located adjacent to commercial and transit uses and would support those uses by locating potential employees and visitors and transit users in an area served by transit and commercial options.
Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long- Range Land Use Diagram.	**No conflict.** As discussed in Sections VI, Energy, XV, Public Services, and XIX, Utilities and Service Systems of this IS/MND, the agencies that provide public infrastructure, services, and utilities to the Project Site have determined there would be sufficient capacity to serve the Project.
Objective 3.2: To provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.	**No conflict.** The Project would promote an improved quality of life by replacing a large surface parking lot and vacant building with approximately 109,957 square feet of production studios and related support space, 388,286 square feet of creative office, and 12,378 square feet of restaurant space near several public transit options, which would reduce employee and visitor vehicle trips, vehicle miles traveled, and resulting air pollution and GHG emissions. In addition, the Project encourages active transportation by including 162 bicycle parking stalls and bike amenities, such as showers and lockers within the Project Site.
Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	**No conflict.** The Project location in an area well-served by transit and retail uses would encourage pedestrian and bicycle access to these uses. The Project would provide pedestrian access via sidewalks along West Santa Monica Boulevard, Wilton Place, West Virginia Avenue, and St, Andrews Place. In addition, the Project would provide secure bicycle parking and amenities to promote cycling. The Project is located on West Santa Monica Boulevard, which includes many commercial uses including convenience markets, restaurants, and other retail uses that could be accessed walking or bicycling.
Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood	**No conflict.** The Project would replace a large surface parking lot and vacant building with a building with interconnected uses on a walkable campus, with

Table 4.8
Applicable Objectives and Policies of the
General Plan Framework Element

Objective/Policy	Would the Project Conflict?
districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	approximately 109,957 square feet of production studios and related support space, 388,286 square feet of creative office, and 12,378 square feet of restaurant space along West Santa Monica Boulevard in an urbanized area well-served by transit, and within bicycling and walking distance of commercial uses. The concentration of studio uses would support the Project Site area's existing range of services and activities and would be consistent with the Community Plan land use designation.
Policy 3.4.1: Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards.	**No conflict.** As shown in Figure 3-1, the Project Site is located in a Mixed Use Boulevard. The Project would replace a large surface parking lot and vacant building with a building with interconnected uses on a walkable campus, with approximately 109,957 square feet of production studios and related support space, 388,286 square feet of creative office, and 12,378 square feet of restaurant space, thereby contributing to the diversity of employment choices in the area. The concentration of infill development would support the Project Site area's existing range of services and activities and would be consistent with the Long-Range Land Use designation. Furthermore, the Project Site is within walking distance of several rapid Metro bus lines along West Santa Monica Boulevard and Western Avenue and the Metro Hollywood/Western B Line transit station.
Policy 3.13.4: Provide adequate transitions where commercial and residential uses are located adjacent to one another.	**No conflict.** At its maximum height of 93 feet at the roof parapet, the proposed building would be taller than the other building heights in the vicinity; however, the proposed design is compatible with the design elements of surrounding production studio buildings in the Hollywood area, especially those with similar use. Specifically, the Project would complement the surrounding buildings by orienting its bungalow offices toward the residential uses to the north of the Project Site, and orienting soundstages to the south of the Project Site along West Santa Monica Boulevard. Office uses would be located along the east and west side of the Project Site, visually anchoring the Project. Thus, the bungalows and landscaped courtyards would appear to terrace down toward the residences along West Virginia Avenue, further reducing the building's massing along its northern elevation facing the neighboring residential lots. Therefore, the Project would not impact the limited number of lower-density residential uses in the area north of the Project Site
Urban Form and Neighborhood Design Chapter	
Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as	**No conflict.** As shown in Figure 3-1, the Project Site is located in a Mixed Use Boulevard. The Project is an infill development within the Hollywood area. Metro runs several rapid bus lines along West Santa Monica

Table 4.8
Applicable Objectives and Policies of the
General Plan Framework Element

Objective/Policy	Would the Project Conflict?
centers for the surrounding neighborhoods, the community or the region.	Boulevard and Western Avenue in the area and is within 1.0 mile of the Metro Hollywood/Western B Line transit station. Thus, the Project would create additional employment opportunities located in proximity to a variety of transportation options.
Policy 5.2.2: Encourage the development of centers, districts, and selected corridor/boulevard nodes such that the land uses, scale, and built form allowed and/or encouraged within these areas allow them to function as centers and support transit use, both in daytime and nighttime. Additionally, develop these areas so that they are compatible with surrounding neighborhoods, as defined generally by the following building characteristics.	**No conflict.** As shown in Figure 3-1, the Project Site is located in a Mixed Use Boulevard. Metro runs several rapid bus lines along West Santa Monica Boulevard and Western Avenue in the area and is within 1.0 mile of the Metro Hollywood/Western B Line transit station. Thus, the Project would create additional employment opportunities located in proximity to a variety of transportation options. The Project would complement the surrounding buildings by orienting bungalow offices toward residential uses to the north of the Project Site, and orienting soundstages to the south of the Project Site along West Santa Monica Boulevard. Office uses would be located along the east and west side of the Project Site, visually anchoring the Project. Thus, the bungalows and landscaped courtyards would appear to terrace down toward the residences along West Virginia Avenue, further reducing the building's massing along its northern elevation facing the neighboring residential lots. Therefore, the Project would not impact the limited number of lower-density residential uses in the area north of the Project Site
Objective 5.5: Enhance the liveability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	**No conflict.** The proposed building would be designed in a contemporary architectural style that would be compatible with the general urban characteristics of the surrounding neighborhood. The proposed commercial building would be moderated by a high degree of articulation, using both variations in building planes and façade setbacks, as well as a variety of materials, and would be designed to complement the surrounding neighborhood.
Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	**No conflict.** As discussed in detail in Section XV.b, Public Services, of this IS/MND, during construction, the Project would implement appropriate temporary security measures including security fencing (e.g., chain-link fencing), low-level security lighting and locked entry (e.g., padlock gates or guard restricted access) to limit access to the Site by the general public. During Project operations, security would be provided via secured access points of entry, security cameras, and 24-hours-a-day/7-days-a-week security program to ensure the safety of its employees and site visitors. Thus, increasing the personal safety in the surrounding area through specific security design features.

Table 4.8
Applicable Objectives and Policies of the
General Plan Framework Element

Objective/Policy	Would the Project Conflict?
Policy 5.9.1: Facilitate observation and natural surveillance through improved development standards which provide for common areas, adequate lighting, clear definition of outdoor spaces, attractive fencing, use of landscaping as a natural barrier, secure storage areas, good visual connections between residential, commercial, or public environments and grouping activity functions such as child care or recreation areas.	**No conflict.** As discussed in detail in Section XV.b, Public Services, of this IS/MND, the Applicant would consult with the LAPD regarding the incorporation of feasible crime prevention features, such as a 24-hours-a-day/7-days-a-week security program to ensure the safety of its employees and site visitors. This security program would include on-site security personnel to monitor entrances and exits, patrol the perimeter of the property, control and monitor activities in the public spaces; manage and monitor fire/life/safety systems, and control and monitor activities in the parking facilities, as well as the installation of security lighting and cameras. Thus, increasing surveillance and safety in the immediate area.
Open Space and Conservation Chapter	
Policy 6.4.8: Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods. a. Encourage the development of public plazas, forested streets, farmers markets, residential commons, rooftop spaces, and other places that function like open space in urbanized areas of the City with deficiencies of natural open space, especially in targeted growth areas. b. Encourage the improvement of open space, both on public and private property, as opportunities arise. Such places may include the dedication of "unbuildable" areas or sites that may serve as green space, or pathways and connections that may be improved to serve as neighborhood landscape and recreation amenities.	**No conflict.** The Project would provide 46,292 square feet of non-required private and common open space for the proposed office and studio tenants. This open space includes private terraces, common terraces, seating areas, and landscaping. Although not open to the public, this non-required open space would reduce the demand on local parks and other public open spaces that the Project might otherwise create.
Economic Development Chapter	
Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.	**No conflict.** The Project would support this objective by providing a building with interconnected uses on a walkable campus, with approximately 109,957 square feet of production studios and related support space, 388,286 square feet of creative office, and 12,378 square feet of restaurant space, thereby contributing to the diversity of employment choices in the area. The proposed studio uses would complement the employment base of the Community Plan area and foster continued economic investment. In addition, the Project Site would have convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in vehicle trips, vehicle miles traveled, and resulting air pollution and GHG emissions,

Table 4.8
Applicable Objectives and Policies of the
General Plan Framework Element

Objective/Policy	Would the Project Conflict?
	to promote environmental quality. Furthermore, the Project would integrate sustainable and green building techniques by incorporating various standards and guidelines to reduce resources and energy consumption, which would also reduce the Project's GHG emissions.
Policy 7.2.2: Concentrate commercial development entitlements in areas best able to support them, including community and regional centers, transit stations, and mixed-use corridors. This concentration prevents commercial development from encroaching on existing residential neighborhoods.	**No conflict.** The Framework Element's Long-Range Land Use Diagram (Metro) identifies the Project Site as being located on a Mixed Use Boulevard. The Project is an infill development within the Hollywood area and is close to a transit corridor served by the Metro subway and bus service.
Policy 7.3: Maintain and enhance the existing businesses in the City.	**No conflict.** The Project would provide new studio, office, and commercial uses, which would bring customers to the Hollywood area who, along with employees, would patronize nearby existing businesses. The mix of studio and commercial uses would enliven the Project Site area and contribute to the vitality of the community, which would benefit existing businesses of the area.
Transportation Chapter	
Policy 2.11: Continue and expand requirements for new development to include bicycle storage and parking facilities, where appropriate.	**No conflict.** The Project would provide short- and long-term bicycle parking in accordance with LAMC Section 12.21.A.16 requirements and would provide 56 short-term and 106 long-term bicycle spaces.
Objective 8.3: Support development in districts, centers and mixed-use boulevards targeted for growth.	**No conflict.** The Project would be consistent with the Framework's Long-Range Land Use Diagram (Metro), which identifies the Project Site as being located on a Mixed Use Boulevard. Mixed Use development is encouraged along these boulevards, with the scale, density and height of development compatible with the surrounding areas. The Project would support this objective by providing a building with interconnected uses on a walkable campus, with approximately 109,957 square feet of production studios and related support space, 388,286 square feet of creative office, and 12,378 square feet of restaurant space.
Policy 8.3.13: Enhance pedestrian circulation in neighborhood districts, community centers, and appropriate locations in regional centers and mixed-use boulevards.	**No conflict.** The Project Site is identified as being located on a Mixed Use Boulevard according to the City's Framework Elements' Long-Range Land Use Diagram. The Project would be contained in a new building designed to be welcoming to pedestrians through its provision of an active and engaging streetscape by providing new planting at grade along the facades on the surrounding streets, as well as on the upper-level terraces near the office bungalows, and in the plaza between the bungalows. These new plantings and the addition of terraces would add visual interest to the environment, would step back the massing and scale of the building near the neighboring

Table 4.8
Applicable Objectives and Policies of the
General Plan Framework Element

Objective/Policy	Would the Project Conflict?
	residential uses, and would provide view beyond the street wall. Thus, improving the pedestrian environment between the Project and the neighboring residential uses.
Infrastructure and Public Services Chapter	
Policy 9.3.1: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.	**No conflict.** The Project would be required to obtain coverage under the National Pollutant Discharge Elimination System Construction General Permit and would implement a Stormwater Pollution Prevention Plan that specifies Best Management Practices and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, in accordance with National Pollutant Discharge Elimination System Municipal Permit requirements, the Project would implement Low Impact Development requirements throughout the operational life of the Project. Consistent with the City's Low Impact Development requirement to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of an infiltration system as established by the Low Impact Development Manual.
Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	**No conflict.** The Project would implement Low Impact Development requirements throughout the operational life of the Project.
Objective 9.10: Ensure the water supply, storage, and delivery systems are adequate to support planned development.	**No conflict.** As discussed in Section XIX, Utilities and Service Systems of this IS/MND, LADWP the Project would be within the Los Angeles Department of Water and Power's current and projected available water supplies for normal, single-dry, and multiple-dry years. As such, the LADWP would be able to meet the water demand of the Project, as well as existing and planned future water demands of its service area. Further, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site. Thus, the Project would not require or result in the construction of new water facilities or expansion of existing facilities.
Source: City of Los Angeles, The Citywide General Plan Framework Element, adopted December 11, 1996 and August 8, 2001; EcoTierra Consulting, 2022.	

Mobility Element 2035

The Transportation Element (Mobility Plan), adopted on January 20, 2016, and readopted September 7, 2016, is a comprehensive update of the General Plan Transportation Element. The Mobility Plan 2035 provides the policy foundation for achieving a transportation system that balances the needs of all road users, incorporates "complete streets" principles and lays the policy foundation for how future generations of Angelenos interact with their streets, in compliance with the Complete Streets Act (AB 1358).

The purpose of the Mobility Plan is to present a guide to the future development of a Citywide transportation system for the efficient movement of people and goods. While the Mobility Plan focuses on the City's transportation network, it complements other components of the General Plan that pertain to the arrangement of land uses to reduce VMT and policies to support the provision and use of alternative transportation modalities. The Mobility Plan includes the following five main goals that define the City's high-level mobility priorities.

- Safety First;
- World Class Infrastructure;
- Access for All Angelenos;
- Collaboration, Communication, and Informed Choices; and
- Clean Environments and Healthy Communities.

Each of these goals contains objectives and policies to support the achievement of those goals. The Project's consistency with applicable policies in Mobility Plan 2035 adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below. A detailed list of the goals, objectives, and policies of Mobility Plan 2035 applicable to the Project is included in Section XVII, Transportation, of this IS/MND, along with a discussion of whether or not the Project does or does not conflict with that particular goal, objective, or policy.

Plan For A Healthy Los Angeles

The Plan for a Healthy Los Angeles is the new Health and Wellness Element of the General Plan. The Plan for a Healthy Los Angeles identifies seven primary goals and associated objectives and policies and possible programs that serve as the implementation blueprint for creating healthier, vibrant communities. As shown in Table 4.9, *Applicable Policies of the Healthy LA Plan*, below, the Project not conflict with, but would implement, a number of the Healthy LA Plan policies.

The Project would promote a healthy built environment by constructing a studio development that includes pedestrian facilities, is proximate to commercial and retail uses, and transit. The Project would include 46,292 square feet of non-required private and common open space for the proposed office and studio tenants. This open space includes private terraces, common terraces, seating areas, and landscaping. Development of the Project would also incorporate security features into the Project design to enhance safety. The Project would comply with Americans with Disabilities Act (ADA) standards. The Project's energy efficiency features and location near major transit facilities would reduce the energy demand and emission footprint of the Project and the per capita GHG emissions of the residents and visitors from private automobile travel. Therefore, the Project would not conflict with the applicable policies in Healthy LA Plan and impacts would be less than significant.

Table 4.9
Applicable Policies of the Healthy LA Plan

Policies	Would the Project Conflict?
Chapter 2 – A City Built for Health	
Policy 2.2 Healthy Building Design and Construction: Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universal accessibility using existing tools practices, and programs.	**No conflict.** The Project would replace a surface parking lot and vacant building with a studio development that includes pedestrian and bicycle facilities, is proximate to commercial and retail uses, and transit. The Project would include 46,292 square feet of non-required private and common open space for the proposed office and studio tenants. This open space includes private terraces, common terraces, seating areas, and landscaping. Development of the Project would also include the incorporation of security features into the Project design to enhance safety. The Project would comply with ADA standards.
Chapter 5 – An Environment Where Life Thrives	
Policy 5.7 Land Use Planning For Public Health and GHG Emission Reduction: Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and other susceptible to respiratory diseases.	**No conflict.** In addition to adhering to smart growth principles of locating new development on infill locations adjacent to existing employment centers and public transportation options, the Project would incorporate a wide range of building technologies and energy efficient design features, such as high efficiency toilet and urinals, low flow showerheads and faucets, draught tolerant and native plants, drip/subsurface, zoned irrigation with weather-based irrigation controllers, and water-conserving turf, thereby reducing water consumption, making use of recycled materials, and producing better indoor and outdoor environmental quality. The Project's energy efficiency features and location near major transit facilities could help reduce its energy and vehicle emission footprint and thus the per capita GHG emissions of its employees and visitors.
Source: City of Los Angeles, Plan for a Healthy Los Angeles, March 2015; EcoTierra Consulting, 2022.	

Hollywood Community Plan

The City's Hollywood Community Plan (Community Plan), which covers the Hollywood area is the land use element of the General Plan applicable to Hollywood. The Community Plan implements the General Plan Framework and includes land use designations, density limits, building heights and other provisions to implement the development that supports the City's policies and development vision for the future. The Community Plan guides land uses on the Project Site and in the surrounding areas. The current plan (adopted September 13, 1988 and effective April 2, 2014) sets forth planning goals and objectives to maintain the community's distinctive character.

The Community Plan promotes an arrangement of land use, circulation, and services which will encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the Community, within the larger framework of the City. By serving to guide development, the Plan encourages progress and change within the community to meet anticipated needs and circumstances, promotes balanced growth, builds on economic potentials

and limits, land development and other trends; and protect investment to the extent reasonable and feasible.[143]

The City is in the process of preparing an update to the Hollywood Community Plan, which is currently in the adoption phase. In its current draft form, the proposed Community Plan update promotes a balance of housing and jobs near transit where different types of land uses (e.g., commercial and residential) can be provided to reduce the length and number of vehicle trips. Based on preliminary information available from the City, the Community Plan Update will propose updates to land use policies, land use designations, and zoning. The Community Plan update is also expected to decrease development potential in low- to medium-scale multi-family residential neighborhoods to conserve existing density and intensity of those neighborhoods.[144] The Project Site is currently designated as Neighborhood Office Commercial under the current Hollywood Community Plan and this would remain unchanged.[145]

The entire Project Site is designated as Neighborhood Office Commercial under the Hollywood Community Plan. The Neighborhood Office Commercial land use designation permits a range of corresponding commercial zones that allow for a variety of commercial and high-density residential uses and intensities. At its maximum height of 93 feet at the roof parapet, the proposed building would be taller than the other building heights in the vicinity; however, the proposed design is compatible with the design elements of surrounding production studio buildings in the Hollywood area, especially those with similar use. Specifically, the Project would complement the surrounding buildings by orienting bungalow offices toward residential uses to the north of the Project Site, and orienting soundstages to the south of the Project Site along West Santa Monica Boulevard. Office uses would be located along the east and west side of the Project Site, visually anchoring the Project. This arrangement of uses would create a visual terraced stepping down view of the building from the West Virginia Avenue residences, with the bungalows and landscaped courtyards further reducing the building's massing as viewed by those neighboring residential lots. As such, the proposed building's contemporary and unique architectural style would be compatible with the general urban characteristics of the surrounding neighborhood. The proposed commercial building would also be moderated by a high degree of articulation, using both variations in building planes and façade setbacks, as well as a variety of materials, that would be designed to complement the surrounding neighborhood.

Furthermore, the Project would provide new employment opportunities within immediate proximity to many of Hollywood's entertainment and commercial destinations, including the numerous media- and entertainment-related business located within and in proximity to the Community Plan

143 City of Los Angeles, Hollywood Community Plan, September 13, 1988 and effective April 2, 2014. https://planning.lacity.org/odocument/78322462-6303-410a-ae8d-8435483c3b41/Hollywood_Community_Plan.pdf, accessed August 2022.

144 City of Los Angeles, Department of City Planning, Hollywood Community Plan Update, https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update, accessed August 2022.

145 City of Los Angeles, Hollywood Community Plan Update, https://ladcp.maps.arcgis.com/apps/MapSeries/index.html?appid=f9d1d0ccda5f40d09b93e213cf1bccf1, accessed November 2022.

area. The Project Site's proximity to major transit lines would facilitate travel by guests to other local destinations in downtown Los Angeles as well as other neighborhoods.

An assessment showing that the Project does not conflict with, but is consistent with, the applicable policies of the Community Plan, and development vision provided therein, is provided in Table 4.10, *Applicable Goals and Policies of the Hollywood Community Plan,* below.

Overall, the Project would result in a less than significant impact as it would not conflict with the applicable policies in the Hollywood Community Plan.

Table 4.10
Applicable Goals and Policies of the
Hollywood Community Plan

Policies	Project Consistency
Objective 1: To coordinate the development of Hollywood with that of other parts of the City of Los Angeles and the metropolitan area. To further the development of Hollywood as a major center of population, employment, retail services, and entertainment; and to perpetuate its image as the international center of the motion picture industry.	**No conflict.** The Project consists of a building with interconnected uses on a walkable campus, with approximately 109,957 square feet of production studios and related support space, 388,286 square feet of creative office, and 12,378 square feet of restaurant space in the Hollywood area, and would therefore perpetuate Hollywood's image as a center of the motion picture industry. Specifically, the Project would provide new entertainment-related employment opportunities, within immediate proximity to many of Hollywood's entertainment and commercial destinations, including the numerous media- and entertainment-related businesses located within and in proximity to the Community Plan area. Furthermore, the Project Site's proximity to major transit lines would facilitate travel by employees and visitors to other local destinations in downtown Los Angeles as well as other neighborhoods.
Objective 2: To designate lands at appropriate locations for the various private uses and public facilities in the quantities and at densities required to accommodate population and activities projected to the year 2010.	**No conflict.** The Project would provide new studio land uses and would not conflict with applicable land use plans and zoning standards with approval of the requested Zone and Height District changes. Furthermore, the addition of the Project's new employees would be within SCAG growth projections for the City, representing approximately 3.33 percent of the Citywide total growth for the period of 2020 to 2025. Since the employment growth associated with the Project would be within the projected growth for the City of Los Angeles subregion, impacts related to population growth would be less than significant, and consistent with this goal of the Community Plan.
Objective 4: To promote economic well-being and public convenience through: a) allocating and distributing commercial lands for retail, service, and office facilities in quantities and patterns based on accepted planning principles and standards. c) Encouraging the revitalization of the motion picture industry.	**No conflict.** The construction of the Project would provide short-term employment opportunities, while the operation of the studios, offices, and restaurant uses would create longer-term entertainment-related employment opportunities, thereby fostering continued economic investment in Hollywood.

Table 4.10
Applicable Goals and Policies of the
Hollywood Community Plan

Policies	Project Consistency
	Furthermore, the operation of the Project's studio and related uses would benefit the revitalization of the motion picture industry.
Objective 5: To provide a basis for the location and programming of public services and utilities and to coordinate the phasing of public facilities with private development. To encourage open space and parks in both local neighborhoods and in high density areas.	**No conflict.** As discussed in Sections VI, Energy, XV, Public Services, and XIX, Utilities and Service Systems, of this IS/MND, the agencies that provide public infrastructure, services, and utilities to the Project Site have determined there would be sufficient capacity to serve the Project. As indicated in those sections, the Project's impacts would be less than significant. In addition, the Project would provide 46,292 square feet of non-required private and common open space for the proposed office and studio tenants. This open space includes private terraces, common terraces, seating areas, and landscaping, and would reduce the Project's demand on local parks and open space.
Objective 6: To make provision for a circulation system coordinated with land uses and densities and adequate to accommodate traffic; and to encourage the expansion and improvement of public transportation service.	**No conflict.** The Project Site is located in an urbanized area that is well-served by public transit provided by Metro. The Project would also provide approximately 162 short- and long-term bicycle parking spaces, per LAMC requirements. Furthermore, the Project would implement a Transportation Demand Management Program, which would promote alternative means of transportation, as discussed in Section XVII, Transportation, of this IS/MND. Thus, the Project would promote opportunities for the use of alternative modes of transportation, including use of public transportation and bicycling.
Objective 7: To encourage the preservation of open space consistent with property rights when privately owned and to promote the preservation of views, natural character and topography of mountainous parts of the Community for the enjoyment of both local residents and persons throughout the Los Angeles region.	**No conflict.** The Project would not adversely affect any open space or natural features, and as discussed in Section IV, Biological Resources, the IS/MND, the Project's impacts on views would be less than significant. The Project would provide 46,292 square feet of non-required private and common open space for the proposed office and studio tenants. This open space includes private terraces, common terraces, seating areas, and landscaping, and would reduce the Project's demands on existing parks and open space.
Land Use – Commerce Policy: The focal point of the Community is the Hollywood Center located generally on both sides of Hollywood and Sunset Boulevards between La Brea and Gower Street… This center area shall function 1) as the commercial center for Hollywood and surrounding communities and 2) as an entertainment center for the entire region. Future development should be compatible with existing commercial development, surrounding residential	**No conflict.** The Project consists of a building with interconnected uses on a walkable campus, with approximately 109,957 square feet of production studios and related support space, 388,286 square feet of creative office, and 12,378 square feet of restaurant space in the Hollywood area, and therefore would perpetuate Hollywood's image as a center of the motion picture industry. Specifically, the Project would provide new entertainment-related employment opportunities within immediate proximity to many of Hollywood's entertainment and commercial

Table 4.10
Applicable Goals and Policies of the
Hollywood Community Plan

Policies	Project Consistency
neighborhoods, and the transportation and circulation system. Developments combining residential and commercial uses are especially encouraged in this Center area.	destinations, including the numerous media- and entertainment-related businesses located within and in proximity to the Community Plan area. Furthermore, the Project Site's proximity to major transit lines would facilitate travel by employees and visitors to other local destinations in downtown Los Angeles as well as other neighborhoods. The Project would be sensitive to the surrounding uses by orienting bungalow offices and landscaped courtyards toward residential uses to the north of the Project Site, and orienting soundstages to the south of the Project Site along West Santa Monica Boulevard. Office uses would be located along the east and west side of the Project Site, visually anchoring the Project. Thus, the bungalows and landscaped courtyards would appear to terrace down toward the residences along West Virginia Avenue, further reducing the building's massing along its northern elevation facing the neighboring residential lots. Therefore, the Project would not impact the limited number of lower-density residential uses in the area north of the Project Site.
Source: City of Los Angeles, Hollywood Community Plan, December 13, 1988, effective April 2, 2014; EcoTierra Consulting, 2022.	

Planning and Zoning Code

All development activity on the Project site is subject to the LAMC, particularly Chapter 1, General Provisions and Zoning, which is also known as the City of Los Angeles Planning and Zoning Code. The LAMC defines the range of zoning classifications throughout the City, provides the specific permitted uses applicable to each zoning designation, and applies development regulations to each zoning designation. As shown in Figure 4.1, *Project Site and Surrounding Zoning Designations*, the Project Site is currently zoned R4-1VL (Multiple Dwelling zone – Height District No. 1VL) and C4-1VL (Commercial – Height District No. 1VL).[146]

146 City of Los Angeles Department of City Planning, Zone Information & Map Access System, http://zimas.lacity.org/, accessed August 2022. The Project Site's previous zoning (T)(Q)RAS4-2D expired on August 17, 2021. The Project Site's underlying and effective zoning is R4-1VL and C4-1VL.

Project Site

Source: City of Los Angeles Planning Zimas Maps, August 2022.
The Project Site's previous zoning (T)(Q)RAS4-2D expired on August 17, 2021.
The Project Site's underlying and effective zoning is R4-1VL and C4-1VL.

Figure 4.1
Project Site and Surrounding Zoning Designations

Permitted Land Uses

Land uses allowed in the currently zoned R4 zone include most uses allowed for development in the R3 zone (apartments, multiple dwellings, and childcare) churches, schools, childcare, and homeless shelters.[147] C4 zoning allows for the development of C2 uses with limitations (retail w/limited manufacturing, service stations and garages, retail business, churches, schools, and auto sales), and R4 uses.[148] The Applicant has requested a Zone and Height District change from R4-1VL and C4-1VL to C4-2D. Therefore, with approval of the requested Zone and Height District change, the Project would be consistent with the Planning and Zoning Code's permitted land uses on the Project Site.

Setback Requirements

Pursuant to LAMC Section 12.11 C, the portion of the Project Site zoned R4, which fronts West Virginia Avenue, must provide front, side, and rear yard setbacks. The front yard setback must be no less than 15 feet; provided, however, that on key lots the minimum front yard setback shall be 10 feet. The width of the side yard for a building more than two stories in height, shall be one foot added to the width of such side yard for each additional story above the second story, but in no event shall a side yard of more than 16 feet in width be required. The rear yard shall not less than 15 feet in depth. One foot shall be added to the depth of such rear yard for each additional story above the third story, but such rear yard need not exceed 20 feet in depth.[149]

Pursuant to LAMC Section 12.16 C, the portion of the Project Site zoned C4, which fronts West Santa Monica Boulevard, is not required to provide for front, side or rear yard setbacks.[150]

The Applicant has requested a Zone and Height District change from R4-1VL and C4-1VL to C4-2D. Therefore, with approval of the Zone Change to C4, the Project would be consistent with the applicable code required setbacks of the C4 zone and impacts would be less than significant.

Height District and Floor Area

The Project Site is located within Height District 1VL. Height District 1VL limits buildings to three stories and a height of to 45 feet in both the R4 and C4 zones.[151] The Project proposes a maximum height of 93 feet at the roof parapet and a FAR of 2.26:1. The Applicant has requested a Zone and Height District change from R4-1VL and C4-1VL to C4-2D, which would allow the Project to be developed with a FAR up to 2.26:1 and to a maximum height of 93 feet and six

147 LAMC Section 12.11 A, https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-110173, accessed August 2022.

148 LAMC Section 12.16 A, https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-111049, accessed August 2022.

149 LAMC Section 12.11 C, https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-110173, accessed August 2022.

150 LAMC Section 12.16 C, https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-111049, accessed August 2022.

151 LAMC Section 12.21.1 A, https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-114268, accessed August 2022.

stories. With approval of the requested Zone and Height District Change, the Project would be consistent with the allowed FAR of 2.26:1 and the maximum height of 93 feet.

Transit Oriented Communities

Measure JJJ was approved by the City's voters on November 11, 2016, and became effective as law when the vote results were certified by the Los Angeles City Council on December 13, 2016. Section 6 of the Measure instructed the Department of City Planning to create the Transit Oriented Communities (TOC) Affordable Housing Incentive Program, a transit-based affordable housing incentive program. The measure required that the Department adopt a set of TOC Guidelines, which establish density increases, parking reductions, and development incentives and concessions for residential or mixed-use projects that contain affordable housing units and that are located within a half-mile of a major transit stop. Major transit stops are defined under existing state law.

The TOC Guidelines, adopted September 22, 2017, establish a tier-based system with varying density increases and development incentives based on a project's distance from different types of transit. The largest increases are reserved for those areas in the closest proximity to significant rail stops or the intersection of major bus rapid transit lines. Required affordability levels are increased incrementally in each higher tier. The TOC Guidelines describe the range of density increases and development incentives that applicants may select.

Each lot within a TOC Affordable Housing Incentive Area is determined to be in one of four tiers based on the shortest distance between any point on the lot and the classification of the nearest qualified Major Transit Stop. An applicant is responsible for providing documentation showing that the location qualifies as a Major Transit Stop and for providing a radius map showing the distance to the Major Transit Stop.

The Los Angeles County Metropolitan Transportation Authority (Metro) and City of Los Angeles Department of Transportation (LADOT) provide regional light rail and local bus service in the Project area, respectively. There are multiple transit options in the immediate area, including, a Metro bus stop on West Santa Monica Boulevard in front of the Project Site, for westbound travel, and across the street for eastbound travel, approximately 292 feet south of the Site, for Metro Route 4, and a Metro bus stop on Western Avenue at Western Avenue/Santa Monica Boulevard, approximately 2,000 feet southeast of the Site, for Metro Route 207. The Project Site is also located within walking distance of the Metro Hollywood/Western B Line Subway, located approximately 5,280 feet (1.0 mile) north of the Project Site. Therefore, the Project has been verified by the City to be in Tier 3 due to its proximity to several rapid Metro bus lines, along West Santa Monica Boulevard and Western Avenue.[152] However, the Project does not include housing and does not qualify for development incentives.

Los Angeles state Enterprise Zone

Enterprise zones are specific geographic areas designated by City Council, and have received approval from the California Department of Commerce under either the Enterprise Zone Act

152 Department of City Planning Case Number PAR-2018-2995-TOC.

Program or Employment and Economic Incentive Act Program to receive economic incentives to stimulate local investment and employment through tax and regulation relief and improvement of public services. Pursuant to LAMC Section 12.21 A.4(x)(3), projects located within the Los Angeles state Enterprise Zone are allowed to utilize a lower parking ratio for commercial office, business, retail, restaurant, bar and related uses, trade schools, or research and development buildings to provide two parking spaces per 1,000 square feet of gross commercial floor area.

The Project is eligible for and will be complying with the Los Angeles Enterprise Zone provisions for reduced parking requirements in the form of 2 parking spaces for every 1,000 square feet of commercial/retail space. Therefore, impacts related to the Project consistency with the Los Angeles River Enterprise Zone would be less than significant.

Overall, the Project would not conflict with the City of Los Angeles Municipal Code and impacts would be less than significant.

Hollywood Redevelopment Project Area

The Project Site is within the Hollywood Redevelopment Project area, wherein the Hollywood Redevelopment Plan provides supplemental guidance for development. In 2011, Assembly Bill x1 26 dissolved all California redevelopment agencies, including the former Community Redevelopment Agency of Los Angeles (CRA/LA). The dissolution of the agencies became effective February 1, 2012. Assembly Bill x1 26, however, did not dissolve adopted redevelopment plans. Therefore, the Hollywood Redevelopment Plan and its requirements for development within the Hollywood Redevelopment Project Area are still in effect. As the City declined to be the successor agency, the state of California appointed the Community Redevelopment Agency of Los Angeles (CRA/LA) to be the successor agency. As of November 11, 2019, when section 11.5.14 of the LAMC went into effect, authority under the redevelopment plans was transferred from CRA/LA to the City. Therefore, the City is currently tasked with implementing and enforcing the requirements of the Redevelopment Plan. Accordingly, this IS/MND assumes the continued applicability of the Redevelopment Plan and addresses the Project's consistency with the Redevelopment Plan. For purposes of this IS/MND, any references to the CRA/LA are intended to reference the City pursuant to these recent changes.

The Redevelopment Plan Map, included as Exhibit A.1 to the Redevelopment Plan, designates the Project Site for Neighborhood and Office land uses, which allows a base maximum FAR of 3:1. This designation exceeds the Community Plan's designation of Neighborhood Office Commercial for the Project Site, which would allow an FAR of 1.5:1. However, as set forth by Section 502 of the Redevelopment Plan, "the land uses permitted in the [Redevelopment] Project Area shall be those permitted by the General Plan, the applicable Community Plan, and any applicable City zoning ordinance, all as they now exist or are hereafter amended and/or supplemented from time to time."

As shown in Table 4.11, *Applicable Objectives of the Hollywood Redevelopment Plan*, below, the Project would implement a number of the Redevelopment Objectives.

Table 4.11
Applicable Objectives of the Hollywood Redevelopment Plan Area

Goals	Project Consistency
3: Promote a balanced community meeting the needs of the residential, commercial, industrial, arts and entertainment sectors.	**No conflict.** The Project is comprised of a building with interconnected uses on a walkable campus, with approximately 109,957 square feet of production studios and related support space, 388,286 square feet of creative office, and 12,378 square feet of restaurant space along a major transportation corridor. The Project's implementation would perpetuate the image of the Hollywood area as a center of the motion picture industry. Specifically, the Project would provide new entertainment-related employment opportunities within immediate proximity to many of Hollywood's entertainment and commercial destinations, including the numerous media- and entertainment-related businesses.
6: Support and promote Hollywood as the center of the entertainment industry and a tourist destination through the retention, development and expansion of all sectors of the entertainment industry and the preservation of landmarks related to the entertainment industry.	**No conflict.** The Project is comprised of a building with interconnected uses on a walkable campus, with approximately 109,957 square feet of production studios and related support space, 388,286 square feet of creative office, and 12,378 square feet of restaurant space along a major transportation corridor. The Project's implementation would perpetuate the image of the Hollywood area as a center of the motion picture industry.
12: Support and encourage a circulation system which will improve the quality of life in Hollywood, including pedestrian, automobile, parking and mass transit systems with an emphasis on serving existing facilities and meeting future needs.	**No conflict.** The Project would promote the use of public transportation and a reduction in vehicle miles traveled by concentrating new development in an area well-served by public transit. Metro runs several rapid bus lines along West Santa Monica Boulevard and Western Avenue in the area and is within 1.0 mile of the Metro Hollywood/Western B Line transit station. The Project would also provide a total of 162 short- and long-term bicycle parking spaces and associated amenities that would promote the use of alternative transportation.

Source: City of Los Angeles, Hollywood Redevelopment Plan, July 12, 2003; EcoTierra Consulting, 2022.

The Project would enhance the image of the Hollywood area as a center of the motion picture industry. Specifically, the Project would provide new employment opportunities within immediate proximity to many of Hollywood's entertainment and commercial destinations, including the numerous media- and entertainment-related businesses (Objectives 3 and 6).

The Project would promote the use of multi-modal travel and public transportation, and a reduction in vehicle miles traveled. The Project would locate new development in an area well-served by public transit. Metro runs several rapid bus lines along West Santa Monica Boulevard and Western Avenue in the area and is within 1.0 mile of the Metro Hollywood/Western B Line transit station. The Project would also provide a total of 162 short- and long-term bicycle parking spaces and related amenities that would promote the use of alternative transportation (Objective 12).

The Hollywood Redevelopment Plan has specific development standards and provides that Neighborhood and Office Uses shall have an FAR of no more than 3:1. The Project would be built on a 225,456-square-foot lot (including 11,373-square-foot alleyway), resulting in a site-wide FAR of up to 2.26:1. Furthermore, Neighborhood and Office Uses shall promote community revitalization and be compatible with the adjacent residential uses and neighborhoods. The Project's design would complement the surrounding buildings by orienting its bungalow offices toward the residential uses to the north of the Project Site, and orienting soundstages to the south of the Project Site along West Santa Monica Boulevard. Office uses would be located along the east and west side of the Project Site, and would visually anchor the Project. This arrangement of uses would create a visual terraced stepping down view of the building from the West Virginia Avenue residences, with the bungalows and landscaped courtyards further reducing the building's massing for the neighboring residential lots to the north. As such, the proposed building's unique and contemporary architectural style would be compatible with the general urban characteristics of the surrounding neighborhood. The proposed commercial building would also be moderated by a high degree of articulation, using both variations in building planes and façade setbacks, as well as a variety of materials, that would be designed to complement the surrounding neighborhood. Overall, the Project would not conflict with the Hollywood Redevelopment Plan and impacts would be less than significant.

Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the General Plan Framework Element's urban design principles and are intended to be used by City of Los Angeles Department of City Planning staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the Framework Element and Community Plans. By offering more direction for proceeding with the design of a project, the Citywide Design Guidelines illustrate options, solutions, and techniques to achieve the goal of excellence in new design. The Citywide Design Guidelines, which were initially adopted by the City Planning Commission in July 2013 and updated in October 2019, are intended as performance goals and not zoning regulations or development standards and, therefore, do not supersede regulations in the LAMC. The guidelines "carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions" and are organized in relation to Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design. The Citywide Design Guidelines incorporate the goals of the previous Walkability Checklist and interact with other guidelines such as those found in Community Design Overlays.

The Project's consistency with applicable objectives in the Citywide Design Guidelines is presented in Table 4.12, *Consistency with Applicable Objectives of the Citywide Design Guidelines*, below. The Project Site is currently developed with a surface parking lot and the former three-story, 98,352-square-foot Sears building that was originally constructed in 1928. The Project has been designed to incorporate a variety of interconnected uses geared toward the entertainment industry in a single building that would include approximately 109,957 square feet of production studios and related support space, 388,286 square feet of creative office, and 12,378 square feet of restaurant space on a walkable campus. The building's design would

Table 4.12
Consistency with Applicable Provisions of the Citywide Design Guidelines

Objective	Project Consistency
Guideline 1: Promote a safe, comfortable and accessible pedestrian experience for all.	The evaluation of the Project's consistency with sub-categories under this guideline is provided below.
Site Planning Provide direct access to the surrounding neighborhood and amenities, including transit.	**Consistent.** The Project would be accessible to the regional bus transit systems. Metro runs several rapid bus lines along West Santa Monica Boulevard and Western Avenue in the area and is within 1.0 mile of the Metro Hollywood/Western B Line transit station. The ground-floor commercial uses would consist of several establishments, each with its own entrance directly accessible from West Santa Monica Boulevard. Pedestrian access to the studio component would also be possible from two lobby areas (one fronting North St. Andrews Place and the other fronting North Wilton Place. Pedestrian wayfinding signage and security lighting would be located at parking garage entrances, elevator lobbies, vestibules, and residential corridors in accordance with the LAMC.
Use ornamental low-level lighting to highlight and provide security for pedestrian paths and entrances. Ensure that all parking areas and pedestrian walkways are illuminated.	**Consistent.** Project lighting would include architectural lighting, interior lighting, and exterior lighting for security and wayfinding purposes. Exterior lights would be wall mounted or ground mounted, directed downward, and shielded away from adjacent land uses. Other illuminated areas would be localized and would minimize light trespass and spill. Light fixtures that broadcast light over large areas or which are a source of direct glare would not be used. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn, but would be designed to prevent light trespass onto adjacent properties.
Building Design Promote pedestrian activity by placing entrances at grade level or slightly above, and unobstructed from view from the public right-of-way. Entryways below street level should be avoided.	**Consistent.** The Project would not include any below street level pedestrian entries. Pedestrian access to the Project's various components would be provided from North St. Andrews Place, West Santa Monica Boulevard, and North Wilton Place. The ground-floor commercial uses would consist of several establishments, each with its own entrance accessible from West Santa Monica Boulevard. Pedestrian access to the studio component would also be possible from two lobby areas (one fronting North St. Andrews Place and the other fronting North Wilton Place.
Guideline 2: Carefully incorporate vehicular access such that it does not discourage and/or inhibit the pedestrian experience.	The evaluation of the Project's consistency with the subtopic under this guideline is provided below.
Site Planning Prioritize pedestrian access first and automobile access second. Orient parking and driveways	**Consistent.** Pedestrian access to the Project's various components would be provided from the sidewalks on North St. Andrews Place, West

Table 4.12
Consistency with Applicable Provisions of the Citywide Design Guidelines

Objective	Project Consistency
toward the rear or side of buildings and away from the public right-of-way. On corner lots, parking should be oriented as far from the corner as possible.	Santa Monica Boulevard, and North Wilton Place through various building entrances and the studio vehicle parking surface parking area. These entrances would be located separately from the vehicular driveways. Vehicular and bicycle access to the Project Site would be provided via two-way entry/exit driveways on North Wilton Place and North Saint Andrews Place. The driveways would allow access to both self-parking and valet within the subterranean parking garage. The Project would also include two at-grade on-site drop-off areas to serve both rideshare arrivals/departures located on North Wilton Place and North Saint Andrews Place. Two studio vehicle and loading entry driveways that lead to a flexible studio vehicle parking and loading area recessed within the building footprint would be provided on West Virginia Avenue. The driveways would not be oriented near the pedestrian access points.
Minimize both the number of driveway entrances and overall driveway widths.	**Consistent.** The existing three curb cuts, located on North St. Andrews Place, West Santa Monica Boulevard, and North Wilton Place would all be removed. Vehicular and bicycle access to the Project Site would be provided via two-way entry/exit driveways on North Wilton Place and North Saint Andrews Place and two studio vehicle and loading entry driveways on West Virginia Avenue. Overall, the number of driveway entrances would not be reduced. However, the driveway located on West Santa Monica Boulevard, which is designated a Modified Avenue I, would be removed, which would improve overall flow of traffic.
Do not locate drop-off/pick-up areas between principal building entrances and the adjoining sidewalks.	**Consistent**. The Project would have two at-grade on-site drop-off areas, with sidewalks for pedestrian access, in the lobby areas of the ground floors, to serve both rideshare arrivals/departures located on North Wilton Place and North Saint Andrews Place, thereby creating a separation between these areas and the pedestrian building entrances.
Orient vehicular access as far from street intersections as possible.	**Consistent**. Vehicular access to the Project Site would be provided via two-way entry/exit driveways on North Wilton Place and North Saint Andrews Place, located midblock. The Project would also include two at-grade on-site drop-off areas to serve both rideshare arrivals/departures located on North Wilton Place and North Saint Andrews Place, also located midblock. Two studio vehicle and loading entry driveways that lead to a flexible studio vehicle parking and loading area recessed within the building footprint would be

Table 4.12
Consistency with Applicable Provisions of the Citywide Design Guidelines

Objective	Project Consistency
	provided on West Virginia Avenue, setback from street intersections.
Ensure that loading areas do not interfere with on-site pedestrian and vehicular circulation by separating loading areas and larger commercial vehicles from areas that are used for public parking and public entrances.	**Consistent.** Two studio vehicle and loading entry driveways that lead to a flexible studio vehicle parking and loading area recessed within the building footprint would be provided on West Virginia Avenue. Pedestrian access to the Project's various components would be provided from the sidewalks on North St. Andrews Place, West Santa Monica Boulevard, and North Wilton Place into the Project.
Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.	The evaluation of the Project's consistency with the subtopic under this guideline is provided below.
Building Design Use architectural elements to reduce the perceived mass of larger projects.	**Consistent.** The Project would be sensitive to the surrounding uses by orienting bungalow offices and landscaped courtyards toward residential uses to the north of the Project Site, and orienting soundstages to the south of the Project Site along West Santa Monica Boulevard. Office uses would be located along the east and west side of the Project Site, visually anchoring the Project. Thus, the bungalows and landscaped courtyards would appear to terrace down toward the residences along West Virginia Avenue, further reducing the building's massing along its northern elevation facing the neighboring residential lots. Therefore, the Project would not impact the limited number of lower-density residential uses in the area north of the Project Site
Avoid long blank walls where pedestrian activity is anticipated.	**Consistent.** The West Santa Monica Boulevard façade of the Project would incorporate landscaping, including a planted green wall, varying roof heights, and vertical wall art, which would break up the studio walls fronting the West Santa Monica Boulevard façade.
Right-of-Way Identify opportunities to utilize the curb lane for one or more of the following: bus boarding pad, bicycle or scooter parking, passenger pick-up and drop-off areas, bicycle lane or parklet, in collaboration with Department of Transportation.	**Consistent.** The Project would provide short- and long-term bicycle spaces as required by the City Bicycle Ordinance. 56 short-term bicycle parking spaces would be located near the western, southern, and eastern perimeters of the Project Site on the ground floor, thereby providing direct access to bicycle parking.
Guideline 4: Organize and shape projects to recognize and respect surrounding context.	The evaluation of the Project's consistency with the subtopic under this guideline is provided below.
Site Planning Lay out the site to ensure that access and building entrances are clearly legible.	**Consistent.** Pedestrian wayfinding signage and security lighting would be located at parking garage entrances, elevator lobbies and vestibules, in accordance with the LAMC.
Building Design Modulate building massing vertically and	**Consistent.** The massing of the Project would be articulated with a setback along the West Virginia

Table 4.12
Consistency with Applicable Provisions of the Citywide Design Guidelines

Objective	Project Consistency
horizontally to a scale compatible to its context.	Avenue frontage. The Project would be sensitive to the surrounding uses by orienting bungalow offices and landscaped courtyards toward the residential uses to the north of the Project Site, and orienting soundstages to the south of the Project Site along West Santa Monica Boulevard. Office uses would be located along the east and west side of the Project Site, visually anchoring the Project. Thus, the bungalows and landscaped courtyards would appear to terrace down toward the residences along West Virginia Avenue, further reducing the building's massing along its northern elevation facing the neighboring residential lots. Therefore, the Project would not impact the limited number of lower-density residential uses in the area north of the Project Site.
Guideline 5: Express a clear and coherent architectural idea.	The evaluation of the Project's consistency with the subtopic under this guideline is provided below.
Building Design Design lighting to enhance the ground floor environment or to emphasize key architectural features without projecting light into the night sky. Utilize adequate, uniform, and glare-free lighting, such as dark-sky compliant fixtures, to avoid uneven light distribution, harsh shadows, and light spillage.	**Consistent.** All exterior lighting would meet all applicable LAMC standards and be shielded or directed toward the areas to be illuminated. The exterior lighting would include soffit downlights in the ground floor covered area, as well as low-level landscape lighting and limited façade up-lighting to highlight key architectural features. In compliance with all applicable LAMC standards, exterior lighting on the Project Site would not illuminate adjacent properties.
Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users.	The evaluation of the Project's consistency with the subtopic under this guideline is provided below.
Site Planning Plant trees and/or install shade structures to increase comfort and provide passive cooling opportunities. Provide canopy trees in planting areas for shade and energy efficiency, especially on south and southwest facing façades.	**Consistent.** The Project would remove 15 street trees and provide the required 42 replacement street trees. In total, the Project would provide a minimum of 42 street trees, including along the south façade, along with low-growing vegetation would be incorporated into the landscape plan.
Install a publicly accessible Electric Vehicle charging station and/or space for car-share providers on the project site, if the site and context is suitable.	**Consistent.** The Project would provide 20 percent of its required parking spaces to be electric-vehicle ready, and ten percent of its required parking spaces would be provided chargers for electric vehicles within the parking structure on the Project Site.
Integrate solar powered lighting to increase energy efficiency.	**Consistent.** The Project would be compliant with the Los Angeles Green Building Code and California Energy/Title 24 requirements. The tower roofs would be engineered with appropriate structural loads and provided with infrastructure to

Table 4.12
Consistency with Applicable Provisions of the Citywide Design Guidelines

Objective	Project Consistency
	accommodate large solar photovoltaic arrays to generate electricity on-site through a renewable source.
Guideline 10: Enhance green features to increase opportunities to capture stormwater and promote habitat.	The evaluation of the Project's consistency with the subtopic under this guideline is provided below.
Site Planning Facilitate stormwater capture, retention, and infiltration, and prevent runoff by using permeable or porous paving materials in lieu of concrete or asphalt. Collect, store, and reuse stormwater for landscape irrigation.	**Consistent.** In accordance with National Pollutant Discharge Elimination System Municipal Permit requirements, the Project would be required to implement Low Impact Development requirements throughout the operational life of the Project. In addition, consistent with the City's Low Impact Development requirement to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of an infiltration system as established by the Low Impact Development Manual.
Select plant species that are adapted and suitable for the site's specific soil conditions and microclimate.	**Consistent.** Landscaping would consist of low water use and drought tolerant landscaping that is suitable to the Project Site.

Source: Citywide Design Guidelines, adopted October 24, 2019; EcoTierra Consulting, 2022.

include the use of modern materials. The building's façade would incorporate a variety of materials to break its solid walls and provide visual interest, including: textured plaster finish, fiber cement board siding, perforated metal screen, standing seam rain screen cladding, and glass. The architectural features of the building would also include: window wall systems, curtain wall systems, an art wall, planted green wall, cable green wall, metal louvers, and integrated and affixed signage. The Project would also provide 46,292 square feet of non-required private and common open space for the proposed office and studio tenants. This open space would include private terraces, common terraces, seating areas, and landscaping. New Project signage would be used for building identification, wayfinding, and security. Exterior lights would be wall- or ground-mounted and shielded away from adjacent land uses. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn, but would be designed to prevent light trespass onto adjacent properties. Therefore, the Project would not conflict with the Citywide Design Guidelines and impacts would be less than significant. **Therefore, impacts would be less than significant and no mitigation measures are required.**

XII. MINERAL RESOURCES

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

a. 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. The Project Site is not located within a mineral resource zone (MRZ).[153] The Project would not involve mineral extraction activities, nor are any such activities presently occurring on the Project Site. **Therefore, no impact would occur and no mitigation measures are required**.

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

No Impact. A significant impact may occur if a project is located in an area used or available for extraction of a locally-important mineral resource extraction and the project converted an existing or potential future locally-important mineral extraction use to another use or if the project affected access to a site used or potentially available for locally-important mineral resource extraction.

As discussed above under responses to Section XII(a), Mineral Resources the Project Site is not within an MRZ. The Project would not affect any extraction activities and there would be no impact on existing or future regionally important mineral extraction sites. Therefore, development of the Project would not result in the loss of availability of a mineral resource that would be of value to the residents of the state or a locally-important mineral resource, or mineral resource recovery site, as delineated on a local general plan, specific plan, or land use plan. **Therefore, no impact would occur and no mitigation measures are required.**

153 Los Angeles County Department of Regional Planning, Planning & Zoning Information, GIS-NET Public online database, accessed September 2021.

XIII. NOISE

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

Noise data was generated for the Project to assist in the preparation of the following noise analysis and is included as Appendix I to this document.

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

Less Than Significant Impact. A significant impact may occur if the project would generate excess noise that would cause the ambient noise environment at the Project Site to fail to comply with noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance) (Section 111.00 through Section 116.01 of the LAMC).

Regulatory Setting

To limit population exposure to physically and/or psychologically damaging as well as intrusive noise levels, the federal government, the state of California, various county governments, and most municipalities in the state have established standards and ordinances to control noise. In most areas, automobile and truck traffic is the major source of environmental noise. Traffic activity generally produces an average sound level that remains constant with time. Air and rail traffic, and commercial and industrial activities are also major sources of noise in some areas. Federal, state, and local agencies regulate different aspects of environmental noise. Federal and state agencies generally set noise standards for mobile sources such as aircraft and motor vehicles, while regulation of stationary sources is left to local agencies.

State of California Noise Requirements

The state of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards and provides guidance for local land use compatibility. state law requires that each county and city adopt a General Plan that includes a Noise Element which is to be prepared per guidelines adopted by the Governor's Office of Planning and Research. The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. In addition, CEQA requires that all known environmental effects of a project be analyzed, including the potential environmental noise impacts.

City of Los Angeles General Plan Noise Element

The City of Los Angeles has adopted a Noise Element of the General Plan to identify goals, objectives, and policies for managing noise issues within the City. The following goal and objectives are identified in the General Plan Noise Element:

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

Objective 1 Reduce airport and harbor related noise impacts.

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

Objective 3 Reduce or eliminate noise impacts associated with proposed development of land and changes in land use.

Exhibit I of the City of Los Angeles General Plan Noise Element identifies Guidelines for Noise Compatible Land Use to evaluate the potential impacts of transportation-related noise. Office buildings, business and professional commercial uses, such as the Project, are considered conditionally acceptable with unmitigated exterior noise levels of less than 77 dBA CNEL. For conditionally acceptable exterior noise levels, new construction or development may proceed only after a detailed analysis of noise mitigation is made and needed noise insulation features are included in project design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning normally will suffice.

As discussed below, this analysis focuses on potential impacts to sensitive noise receptors. Within the Project Site vicinity, the closest sensitive receptors are the residential uses. Per the Noise Element, noise levels between 70 and 75 dBA CNEL are considered "normally unacceptable" and noise levels at 75 dBA CNEL and greater are considered "clearly unacceptable" for residential uses. Noise levels between 55 and 70 dBA CNEL are considered "conditionally acceptable" and noise levels less than 55 dBA CNEL are considered "normally acceptable" for single-family residential uses.

City of Los Angeles Operational Noise Standards

To analyze noise impacts originating from a designated fixed location or private property such as the Project, stationary-source (operational) noise such as HVAC equipment and trash enclosure activity are typically evaluated against standards established under a jurisdiction's Municipal Code or General Plan.

Chapter XI of the LAMC establishes Noise Regulations, setting exterior noise limits to control community noise impacts from commercial noise sources including air conditioning units, refrigeration, heating, pumping, and filtering equipment. Section 112.02 indicates that such equipment shall not operate in a manner as to cause the noise level at any sensitive use to exceed the existing ambient noise level by 5 dBA. Section 114.03 prohibits loading or unloading any vehicle, or operate dollies, carts, forklifts, or other wheeled equipment causing impulsive sound, raucous or unnecessary sound within 200 feet of any residential building between the hours of 10:00 P.M. and 7:00 A.M of the following day. Also, Section 114.06 prohibits installation, operation or use of any vehicle theft alarm system that emits or causes the emission of an audible sound, which is not, or does not become, automatically and completely silenced within five minutes.

City of Los Angeles Construction Noise Standards

Section 112.05 of the City's Municipal Code identifies exterior noise level limits for construction equipment in any residential zone or within 500 feet thereof, as follows:

- 75dB(A) for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment.

However, the above limitation does not apply where technically infeasible (i.e., the noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers, and/or any other feasible noise reduction measures).

Significance Criteria

The City has determined that the Project's temporary or permanent increase in ambient noise levels in the vicinity of the Project Site shall be considered significant if any of the following occur as a direct result of the Project.

Off-Site Operational Traffic Noise

- When the noise levels at existing and future noise-sensitive land uses (e.g., residential, etc.):
    - are less than 60 dBA CNEL and the Project creates a readily perceptible 5 dBA CNEL or greater Project-related noise level increase; or
    - range from 60 to 65 dBA CNEL and the Project creates a barely perceptible 3 dBA CNEL or greater Project-related noise level increase; or

- already exceed 65 dBA CNEL, and the Project creates a community noise level impact of greater than 1.5 dBA CNEL (FICON, 1992).

Operational Stationary-Source Noise

- If the Project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category (as specified in the Table on page I.2-4 of the *L.A. CEQA Thresholds Guide*, Community Noise Exposure), or;

- If Project-related operational (stationary source) noise levels exceed the exterior ambient noise levels at adjacent sensitive receiver locations by 5 dBA Leq (LAMC § 112.02).

Construction Noise and Vibration

Section 112.05 of the City's Municipal Code identifies exterior noise level limits for construction equipment in any residential zone or within 500 feet thereof, as follows:

- 75dB(A) for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment. However, the above limitation does not apply where technically infeasible (i.e., the noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers, and/or any other feasible noise reduction measures).

The City currently does not have significance criteria to assess vibration impacts during construction. Thus, the City has determined to use the Federal Transit Administration ("FTA") guidelines set forth in FTA's Transit Noise and Vibration Assessment, dated September 2018, to evaluate the Project's potential impacts related to construction vibration for both potential building damage and human annoyance. The FTA guidelines regarding construction vibration are the most current guidelines and are commonly used in evaluating vibration impacts.

Based on this FTA guidance, impacts relative to ground-borne vibration associated with potential building damage would be considered significant if any of the following future events were to occur:

- Project construction activities cause ground-borne vibration levels to exceed 0.5 PPV at the nearest off-site reinforced-concrete, steel, or timber building.

- Project construction activities cause ground-borne vibration levels to exceed 0.3 PPV at the nearest off-site engineered concrete and masonry building.

- Project construction activities cause ground-borne vibration levels to exceed 0.2 PPV at the nearest off-site non-engineered timber and masonry building.

- Project construction activities cause ground-borne vibration levels to exceed 0.12 PPV at buildings extremely susceptible to vibration damage, such as historic buildings.

Based on FTA guidance, construction vibration impacts associated with human annoyance would be significant if the following were to occur (applicable to frequent events; 70 or more vibration events per day):

- Project construction activities cause ground-borne vibration levels to exceed 72 VdB at off-site sensitive uses, including residential and hotel uses.
- Project construction activities cause ground-borne vibration levels to exceed 65 VdB at off-site studio (recording/broadcast) uses.

Existing Noise Level Measurements

To assess the existing noise level environment, four short-term, 15-minute noise level measurements were taken at sensitive receiver locations in the Project study area. The receiver locations were selected to describe and document the existing noise environment within the Project study area. The Project study area is the area generally defined by Virginia Avenue, North Wilton Place, Santa Monica Boulevard and North St. Andrews Place. The 15-Minute Noise Measurement Datasheet (see Appendix I) provides the location of the Project Site and the noise level measurement locations. To fully describe the existing noise conditions, noise level measurements were collected on August 18, 2022, which represents a typical day on which residents go to work/school.

Measurement Procedure and Criteria

The noise measurements were taken using the Larson Davis SoundTrack LxT2 sound level meter, which conforms to industry standards set forth in American National Standard Institute (ANSI) S1.4-1983 (R2006) – Specification for Sound Level Meters/Type 1, and is consistent with the requirements specified in LAMC Section 111.01(l) that the instruments be "Type S2A" standard instruments or better. This instrument was calibrated and operated according to the manufacturer's written specifications. At the measurement sites, the microphone was placed at a height of approximately five feet above the ground. The sound level meter was programmed to record the average sound level (Leq) over a period of 15 minutes in accordance with LAMC Section 111.01(a).

Noise Measurement Locations

The short-term noise level measurements were taken as close to the nearest sensitive receiver locations as possible to assess the existing ambient noise levels at those sensitive receiver locations and therefore the existing ambient noise levels surrounding the Project Site. Both Caltrans and the FTA recognize that it is not reasonable to collect noise level measurements that can fully represent any part of a private yard, patio, deck or balcony normally used for human activity when estimating impacts for new development projects. This fact is demonstrated in the Caltrans general site location guidelines which indicate that, *sites must be free of noise contamination by sources other than sources of interest. Avoid sites located near sources such as barking dogs, lawnmowers, pool pumps, and air conditioners unless it is the express intent of*

the analyst to measure these sources.[154] Further, FTA guidance states, *it is not necessary nor recommended that existing noise exposure be determined by measuring at every noise-sensitive location in the project area. Rather, the recommended approach is to characterize the noise environment for clusters of sites based on measurements or estimates at representative locations in the community*.[155]

Based on recommendations of Caltrans and the FTA, it is not necessary to collect measurements at each individual building or residence, because each receiver measurement represents a group of buildings that share acoustical equivalence. Receivers represent a location of noise sensitive areas that are used to estimate the future noise level impacts. Collecting reference ambient noise level measurements at the nearby sensitive receiver locations allows for a comparison of the before- and after-Project noise levels and is necessary to assess potential noise impacts due to the Project's contribution to the ambient noise levels.

Noise Measurement Results

The results of the measurements are summarized in Table 4.13, *Existing Ambient Noise Levels*. The noise monitoring outputs are provided in Appendix I of this document. See Figure 4.2, *Noise Measurement Locations*.

As shown in Table 4.13, the ambient recorded noise levels range from 57.7 dBA Leq to 71.4 dBA Leq in the Project vicinity.

Construction Impacts

This section analyzes potential impacts resulting from the short-term construction activities associated with the development of the Project.

The City of Los Angeles General Plan Noise Element defines noise-sensitive uses as: *single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodgings and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves, and parks*. Land uses that are considered relatively insensitive to noise include business, commercial, and professional developments. Land uses that are typically not affected by noise include: industrial, manufacturing, utilities, agriculture, natural open space, undeveloped land, parking lots, warehousing, liquid and solid waste facilities, salvage yards, and transit terminals.

154 Caltrans Technical Noise Supplement. September 2013. Page 3-4. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf, accessed August 9, 2021.

155 FTA Transit Noise and Vibration Assessment. May 2006. Page 3-10. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf, accessed August 9, 2021.

NM# Noise Measurement Locations

Project Site

Source: Google Earth, January 2020.

Figure 4.2
Noise Monitoring Locations

Table 4.13
Existing Ambient Noise Levels

Noise Measurement Location	Location	Primary Noise Sources	Noise Levels[a]		
			L_{eq}	L_{max}	L_{min}
NM1	Adjacent to the multi-family residential uses on the northern side of Virginia Avenue, north of the Project Site	Main noise sources are from vehicular traffic travelling along Virginia Ave, N Wilton Pl, Santa Monica Blvd, N St Andrews Pl & other surrounding roads. The local buildings reflect & refract much of the sound. Other noise sources include bird song, residential ambiance, wind chimes, music being played from various residences, businesses, pedestrians. Air traffic consisting of helicopters, light propeller aircraft and commercial jet liners. Leaf rustle from nearby palm trees due to 7 mph breeze.	59.6	71.6	49.7
NM2	Adjacent to the multi-family residential use on the south side of Santa Monica Boulevard, south of the Project Site.		71.4	82.1	55.3
NM3	Adjacent to the single- and multi-family residential uses on the western side of N. Wilton Place, west of the Project Site.		66.8	84.2	55.2
NM4	Adjacent to the multi-family residential uses north of Virginia Avenue and east of N. St Andrews Place, northeast of the Project Site.		57.7	72.3	48.6

[a] Noise measurements were taken on August 18, 2022 at each location for a duration of 15 minutes. See Appendix I of this document for noise data.
Source: EcoTierra, 2022.

Construction Noise Levels

Noise generated by the Project construction equipment will include a combination of trucks, power tools, concrete mixers and portable generators that when combined can reach high levels. The number and mix of construction equipment are expected to occur in the following stages:

- Demolition
- Site Preparation/Excavation
- Foundation
- Building Construction
- Architectural Coating

The Project is anticipated to start demolition in 2023, take approximately 25 months to complete, and end approximately in 2025.

The closest sensitive receptors to the Project Site include:

- The multi-family residential uses located approximately 60 feet north of the Project Site, on the northern side of West Virginia Avenue (NM1),
- The multi-family residential uses located approximately 75 feet south of the Project Site, on the southern side of West Santa Monica Boulevard (NM2),
- The residential uses located approximately 60 feet west of the site, on the on the western side of North Wilton Place (NM3), and
- The residential uses located approximately 218 feet northeast of the Project Site, on the northern side of West Virginia Avenue, east of North St. Andrews Place (NM4).

Other noise sensitive land uses are located further from the Project Site and would experience lower impacts. Construction and demolition noise will vary depending on the construction process, type of equipment involved, location of the construction site with respect to sensitive receptors, the schedule proposed to carry out each task (e.g., hours and days of the week) and the duration of the construction work.

A summary of noise level data for a variety of construction equipment compiled by the FTA is presented in Table 4.14, *Noise Range of Project Construction Equipment***.** Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings.

Construction noise associated with the Project was calculated utilizing methodology presented in the FTA Transit Noise and Vibration Impact Assessment Manual (2018) together with several key construction parameters including: distance to each sensitive receiver, equipment usage, percent usage factor, and baseline parameters for the Project Site. Distances to receptors were based on the distance from the structural façade of the receptor to the acoustical center of the proposed construction activity. Construction noise levels were calculated for each phase. To be conservative, it was assumed that all the pieces of equipment in each phase would be operating concurrently and the noise generated by each piece of equipment was added together for each phase of construction; however, it is unlikely (and unrealistic) that every piece of equipment will be used at the same time, at the same distance from the receptor, for each phase of construction. The highest noise levels during each construction phase at the closest receptors are presented in Table 4.15, and worksheets are included as Appendix I to this document.

As defined by the Section 41.40 of the LAMC, a project would normally have a significant impact on noise levels from construction if construction activity (including demolition) or repair work, where the use of any power tool, device, or equipment would disturb persons occupying sleeping quarters in any dwelling hotel, apartment, or other place of residence, occurs between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, or between 6:00 P.M. and 8:00 A.M. on Saturday. Per Section 112.05 of the LAMC, a significant impact due to noise levels from construction could also occur if equipment is operated in a manner that causes noise levels to exceed 75 dBA at a distance of 50 feet, between the hours of 7:00 A.M. and 10:00 P.M.; however, these noise level limitations do not apply where compliance is deemed to be technically infeasible,

Table 4.14
Noise Range of Project Construction Equipment

Equipment Description	Impact Device?	Acoustical use Factor (%)	Typical Noise Level @ 50ft (Lmax dBA)
Compressor (air)	No	40	78
Concrete Mixer Truck	No	40	79
Concrete Pump	No	20	81
Concrete Saw	No	20	90
Crane	No	16	81
Drill Rig	No	20	79
Dozer	No	40	82
Forklift [a, b]	No	50	61
Front End Loader	No	40	79
Generator	No	50	81
Grader	No	40	85
Haul/Dump Truck	No	40	76
Paver	No	50	77
Pickup Truck	No	50	77
Roller	No	20	80
Tractor/Loader Backhoe	No	40	79
Welder/Torch	No	40	74

[a] *Warehouse & Forklift Noise Exposure - NoiseTesting.info Carl Stautins, November 4, 2014 http://www.noisetesting.info/blog/carl-strautins/page-3/*
[b] *Data provided Leq as measured at the operator. Sound Level at 50 feet is estimated.*
Source: FHWA RCNM User's Guide, 2006.

which means that said noise limitations cannot be met despite the use of mufflers, shields, sound barriers, and/or other noise reduction techniques during the operation of the equipment.

Without considering the effect of the Project Design Features incorporated into the Project, the highest Project construction noise levels at the nearest sensitive receptors during construction are shown in Table 4.15, *Construction Noise Levels at Closest Receptor Locations Without Project Design Features***.** As shown in Table 4.15, even without the Project Design Features incorporated into the Project, the highest construction noise levels, which would occur during the demolition phase, would not result in any exceedance of the LAMC 75 dBA construction noise threshold.

Table 4.15
Construction Noise Levels at Closest Receptor Locations Without Project Design Features

Off-Site Receptor Location	Maximum Construction Noise Levels[b]	Applicable Standard (dBA)[c]	Exceeds Standard?
(NM1) The multi-family residential uses located to the north of the Project Site, on the northern side of Virginia Avenue.	73.1	75	No
(NM2) The multi-family residential uses located to the south of the Project Site, on the southern side of Santa Monica Boulevard.	73.1	75	No
(NM3) The residential uses located to the west of the site, on the on the western side of N. Wilton Place.	67.2	75	No
(NM4) The residential uses located to the northeast of the Project Site, on the northern side of Virginia Avenue, east of N. St. Andrews Place	63.9	75	No

[a] *Noise measurement locations are shown on Figure 4.2.*
[b] *Construction noise worksheets showing noise levels for all phases of construction are provided in Appendix I.*
[c] *The applicable LAMC standard is 75 dBA.*
Source: EcoTierra, 2022.

Impacts from construction noise are therefore considered to be less than significant. However, to ensure that construction noise levels do not exceed any thresholds, the following best management practices (BMPs) are incorporated into the Project as Project Design Features:

Project Design Features

PDF NOI-1:

- Use of noise control devices, such as equipment mufflers, enclosures, and barriers. Natural and artificial barriers such as ground elevation changes and existing buildings can shield construction noise. Stage construction operations as far from noise sensitive uses as possible;
- Avoid residential areas when planning haul truck routes and locate the haul truck staging/ingress/egress area as far away from noise sensitive uses as possible;
- Maintain all sound-reducing devices and restrictions throughout the construction period;
- Replace noisy equipment with quieter equipment (for example, rubber-tired equipment rather than track equipment); and
- Change the timing and/or sequence of the noisiest construction operations to avoid sensitive times of the day.

As noted above, LAMC Section 41.40 regulates noise from construction activities by regulating the days and hours during which construction may occur. The construction activities associated with the Project would comply with these LAMC requirements. In addition, pursuant to LAMC Section 112.05, construction noise levels are exempt from the 75 dBA noise threshold if all technically feasible noise attenuation measures are implemented. In conformance with the requirements of LAMC Section 112.05, implementation of the aforementioned BMPs would assist in reducing the noise levels associated with construction of the Project to the maximum extent that is technically feasible. Thus, based on the provisions set forth in LAMC 112.05, implementation of the noise BMPs listed in **PDF NOI-1** above would ensure the Project would be consistent with the LAMC and construction noise impacts would be less than significant.

Off-Site Construction Noise Impacts

The highest potential for off-site construction noise is sourced from hauling trips. The anticipated outbound haul route from the Project Site would be from St Andrews Place, along Santa Monica Boulevard to the 101 freeway. During the demolition duration of 20 days, the Project would generate approximately 30 haul truck trips per day (15 inbound, 15 outbound) travelling to and from the Project Site. These haul route trips would travel along the anticipated haul route. Approximately 251,000 cubic yards of soil would be excavated and exported from the Project Site during the site preparation/excavation phase of approximately 100 days, when the Project would generate approximately 314 haul truck trips per day (157 inbound, 157 outbound) travelling to and from the Project Site. There are commercial uses along the haul route along Santa Monica Boulevard; therefore, those uses would not be impacted by haul truck-related noise. However, during the site preparation/excavation phase a limited number of trucks would need to enter and exit the Project Site via a truck-sized opening in the noise barrier along Virginia Avenue, near St Andrews Place. The worksite traffic control plan shows a partial lane closure along the eastbound lane of Virginia Avenue. As a Project Design Feature (PDF), this partial lane closure would be used to erect a construction noise barrier that would ensure that the haul trucks entering and exiting the Project Site at this location would not generate noise impacts at the closest sensitive receptor located on the northern side of Virginia Avenue. This noise barrier will be constructed so that it blocks the line-of-sight from the closest residential uses on the north side of Virginia Avenue to the haul trucks entering and exiting the Project Site. Additionally, there will be only limited haul truck activity entering and exiting the Project Site from the opening on Virginia Avenue; the majority of haul truck activity will be entering and exiting the Project Site from a location on the southern portion of St Andrews Place, at a distance of approximately 104 feet from the building façade of the closest sensitive receptor (located on the northwestern corner of Virginia Avenue and St Andrews Place).

As shown in Table 4.15 above, typical noise from haul trucks driving by can reach up to 76 dBA Lmax at a distance of 50 feet. At a distance of approximately 104 feet from the haul truck activity to the closest receptor, the noise level from each haul truck would be approximately 69.64 dBA Lmax. However, the opening along Virginia Avenue where the limited number of haul trucks would be entering and exiting the Project Site would be approximately 50 feet from the closest sensitive receptor. As shown in Table 4.14 above, the existing, daytime maximum noise levels for the closest sensitive uses to the haul route are 71.6 dBA to 72.3 dBA Lmax. Therefore, without its

incorporation of **PDF NOI-2**, the Project's potential haul truck noise during the site preparation/excavation phase the Virginia Avenue access would be used would exceed ambient noise levels and exceed 75 dBA. However, with the Project's incorporation of **PDF NOI-2**, the noise generated by the ingress and egress of the limited number of Project haul trucks at this location would be shielded by a plywood noise barrier,[156] which would reduce the noise level by at least 10 dBA to 66 dBA Lmax. As such, the noise levels generated by a Project haul truck along the haul route and on St Andrews Place would be less than the existing, ambient noise levels at receptor locations, and less than significant. **Therefore, with incorporation of PDF NOI-2, impacts from off-site construction noise would be less than significant and no mitigation measures are required.**

Project Design Features

PDF NOI-2: The construction contractor shall construct at least a 0.5 inch plywood noise barrier surrounding a truck-sized opening in the noise barrier along Virginia Avenue, near St Andrews Place. This plywood noise barrier shall block the line-of-sight from the closest sensitive receptors on the northern side of Virginia Avenue to the haul trucks entering and exiting the Project Site at this location. The construction contractor shall limit the number of haul trucks utilizing the Virginia Avenue access to the Project Site and require that the majority of haul truck activity access the Project Site from a location on the southern portion of St Andrews Place, at a distance of approximately 104 feet from the building façade of the closest sensitive receptor (located on the northwestern corner of Virginia Avenue and St Andrews Place).

Off-Site Operational Noise Impacts

Existing and Existing Plus Project traffic noise levels were modeled utilizing the Federal Highway Administration (FHWA) Traffic Noise Prediction Model - FHWA-RD-77-108 at a distance of 50 feet from roadway centerline. The uniform distance allows for direct comparisons of potential increases or decreases in noise levels based upon various traffic scenarios; however, at this distance, no specific noise standard necessarily applies. Therefore, the change in a noise level between scenarios is the focus of this portion of the analysis, rather than the resulting independent noise level for any one segment. These worksheets are included as Appendix I to this document. The modeling is theoretical, and is considered conservative because it does not account for any existing barriers, structures, and/or topographical features that may further reduce noise levels. Therefore, the levels are shown for comparative purposes, only, to show the difference in traffic noise levels with and without Project conditions. Roadway input parameters are based on ADTs, speeds, and vehicle distribution data. The potential off- site noise impacts caused by an increase of traffic volumes from operation of the Project on the nearby roadways were calculated for the following scenarios:

156 FHWA Highway Noise Barrier Design Handbook (2000) Table 3, page 26, shows that 0.5-inch thick plywood has a transmission loss of 20 dBA.

Existing refers to existing year 2022 traffic noise conditions. *Existing Plus Project* refers to existing year 2022 traffic noise conditions plus traffic generated by the Project. Both scenarios are shown in Table 4.16, *Off-Site Traffic Noise Impacts– Existing With Project Conditions*.

Table 4.16
Off-Site Traffic Noise Impacts – Existing With Project Conditions

Noise Levels 50 feet from Roadway Centerline*						
	Existing		Existing Plus Project			
Road Segments	ADT	dB CNEL	ADT	Total	Project-Specific Increase	Is the Increase Significant ?
N. Wilton Place						
n/o La Mirada Ave	7,330	66.4	7,540	66.5	0.1	**No**
s/o La Mirada Ave	8,900	67.2	9,080	67.3	0.1	**No**
n/o Santa Monica Blvd	8,530	67.0	8,770	67.1	0.1	**No**
s/o Santa Monica Blvd	11,510	68.3	11,720	68.4	0.1	**No**
N. St Andrews Place						
n/o Santa Monica Blvd	1,220	58.6	1,760	60.2	1.6	**No**
s/o Santa Monica Blvd	2,450	61.6	2,450	61.6	0.0	**No**
Western Avenue						
n/o Lexington Ave	14,590	69.3	15,410	69.6	0.3	**No**
s/o Lexington Ave	14,920	69.4	14,920	69.4	0.0	**No**
n/o Santa Monica Blvd	12,020	68.5	12,020	68.5	0.0	**No**
s/o Santa Monica Blvd	13,680	69.1	14,090	69.2	0.1	**No**
La Mirada Avenue						
w/o Wilton Pl	590	55.4	1,000	57.7	2.3	**No**
e/o Wilton Pl	520	54.9	520	54.9	0.0	**No**
Lexington Avenue						
w/o 101 fwy off ramps	2,780	62.1	3,020	62.5	0.4	**No**
e/o 101 fwy off ramps	8,110	66.8	8,930	67.2	0.4	**No**
w/o Western Ave	780	56.6	900	57.2	0.6	**No**
Santa Monica Boulevard						
w/o Wilton Pl	13,250	68.9	13,870	69.1	0.2	**No**
e/o Wilton Pl	10,360	67.9	10,360	67.9	0.0	**No**
w/o St. Andrews Pl	19,190	70.5	19,190	70.5	0.0	**No**
e/o St. Andrews Pl	17,330	70.1	19,180	70.5	0.4	**No**
w/o Western Ave	11,930	68.5	12,470	68.7	0.2	**No**
e/o Western Ave	12,130	68.5	13,570	69.0	0.5	**No**

Notes: ADT = average daily trips, dB = decibels, CNEL = community noise equivalent level
* *The uniform distance of 50 feet allows for direct comparisons of potential increases or decreases in noise levels based upon various traffic scenarios; however, at this distance, no specific noise standard necessarily applies.*
Source: EcoTierra, 2021.

As stated previously, the traffic noise is considered to be significant when the noise levels at existing and future noise-sensitive land uses (e.g., residential, etc.):

- are less than 60 dBA CNEL and the Project creates a readily perceptible 5 dBA CNEL or greater Project-related noise level increase; or
- range from 60 to 65 dBA CNEL and the Project creates a barely perceptible 3 dBA CNEL or greater Project-related noise level increase; or
- already exceed 65 dBA CNEL, and the Project creates a community noise level impact of greater than 1.5 dBA CNEL (FICON, 1992).

As shown in Table 4.16, Project-generated vehicular trips from all of the modeled roadway's segments would result in an increase in ambient noise levels of 2.3 dBA[157] over the Existing scenario, and would not exceed the *Noise Element* threshold standards presented above.

Additionally, medium- and heavy-duty type delivery trucks are anticipated to intermittently visit the site as needed; however, the number of these truck trips is not expected to be more than between 10 to 40 round trips per day and would not significantly contribute to off-site traffic noise upon roadways in the Project's vicinity. The existing traffic noise level along West Virginia Avenue was calculated as 56.9 dBA CNEL.[158] If 40 delivery truck trips were to occur along Virginia Avenue, the traffic noise level generated by those medium and heavy-duty trucks would be 56.4 dBA CNEL. When the existing traffic noise level is added to the truck trip noise level, the resulting noise level is 59.7 dBA CNEL, which is an increase of 3.3 dBA CNEL, which would not exceed the 5 dBA significant noise level increase threshold stated above. **Therefore, traffic noise impacts to off-site receptors due to Project-generated trips would be less than significant and no mitigation measures are required.**

On-Site Operational Noise Impacts

This section analyzes the potential on-site operational noise impacts due to the Project's stationary noise sources.

Parking Noise

The proposed parking areas have the potential to generate noise due to cars entering and exiting, engines accelerating, braking, car alarms, squealing tires, and other general activities associated with people using the parking areas (i.e., talking, opening/closing doors, etc.). Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. During these types of activities, the noise levels can range from 36 to 69 dBA Leq at a distance of 50 feet from the source.[159] Since, except for the driveway areas, the majority of the parking area would be enclosed in a subterranean parking garage, noise generated from within the parking area would not adversely affect off-site sensitive receptors. Further, the ground level parking lot proposed on-

157 As the increase in noise levels is 2.3 dBA CNEL at 50 feet from the centerline, it would also be an increase of 2.3 dBA CNEL at the property line of affected uses.

158 Calculated from a traffic volume of 1,726 ADT based on data provided for Virginia Avenue by Overland Traffic Consultants.

159 Gordon Bricken & Associates, 1996. Estimates are based on actual noise measurements taken at various parking lots.

site would be enclosed by solid roll down doors and a solid, insulated plaster stud frame wall that would block the view of on-site activities from the nearby residential uses.

Using the reference noise level of 71 dBA leq at a distance of 50 feet[160] for the on-site noise from delivery trucks and 63.3 dBA Leq at 10 feet for loading/unloading activities,[161] the noise levels generated at the closest receptors (the residential uses located north of West Virginia Avenue, approximately 70 feet from the area of on-site activity), from delivery trucks and loading/unloading activities would be 68.11 dBA Leq. However, the solid roll down doors and the solid, insulated plaster stud frame wall would affect a transmission loss of at least 20 dBA, which would reduce the noise level down to 48.11 dBA, which would be lower than the ambient noise level of 59.6 dBA Leq along West Virginia Avenue.

The noise generated by weekly trash truck pickup would be similar to that reported above for the haul trucks. Trash trucks would already be part of the existing noise environment, as they already service the commercial and residential uses in the Project vicinity. Furthermore, operational noise generated by motor vehicles within the Project Site would be regulated under the LAMC. Specifically, Section 114.02 of the LAMC prohibits the operation of any motor vehicles upon any property within the City such that the created noise would cause the noise level on the premises of the property to exceed the ambient noise level by more than five decibels. LAMC Section 114.06 prohibits any person from installing, operating or using any vehicle theft alarm system that emits or causes the emission of an audible sound, which is not, or does not become, automatically and completely silenced within five minutes. LAMC Section 114.03 prohibits loading or unloading of any vehicle, operating any dollies, carts, forklifts, or other wheeled equipment, which causes any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building between the hours of 10:00 P.M. and 7:00 A.M. of the following day. **Therefore, through project design and compliance with existing LAMC regulations, noise impacts associated with the on-site parking areas would be less than significant and no mitigation measures are required.**

Stationary Noise Sources

HVAC

As part of the Project, HVAC units, and exhaust fans would be installed for the proposed uses. Based on estimated A-weighted noise ratings published for standard HVAC equipment,[162] sound power from rooftop mounted HVAC equipment would be expected to range from 69 dBA Leq to 74 dBA Leq at the source. Sound power is the sound energy released from a source, which cannot be heard, while sound pressure is the sound that is heard based on the environment and distance to a receptor. By converting a 74-dBA sound power level at a source to sound pressure levels at

160 Eyestone Environmental, LLC, 2022. 8th & Alameda Studios Project. Case number ENV-2021-4260-MND. Page 166. February 2022.

161 Michael Brandman Associates (MBA), 2010. Los Banos Walmart Expansion Project EIR. October 10.

162 Carrier Corporation, Product Data Sheet for 25HBC5 Base 15 Heat Pump with Puron Refrigerant (1½ to 5 Nominal Tons.

50 feet using standard acoustical fundamentals and formulas,[163] the sound pressure level for HVAC equipment would be approximately 39.9 dBA at 50 feet which translates to a noise level of 38.32 dBA at the closest sensitive receptors, NM1 (Virginia Avenue) and at sensitive receptor NM3 (North Wilton Place). As shown in Table 4.15, ambient noise levels in the vicinity of the Project Site were measured up to 71.4 dBA. Therefore, noise levels from use of HVAC would not exceed existing noise levels at sensitive receptor locations in the Project vicinity.

Although the operation of this equipment would generate noise, the design of all of the Project's mechanical equipment would be required to comply with the regulations under Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 decibels.

Trash/Recycling

The trash/recycling area is located in its own room on the ground floor level of the building, adjacent to the restrooms and production office; therefore, noise from trash sorting/recycling will not be audible at the closest sensitive receptor locations.

Outdoor Spaces

The office areas on Levels 4, 5 and 6 include some covered, outdoor office space on both the western and eastern portions of the buildings. These outdoor office areas may host a few events per year that would be subject to permitting requirements. It is anticipated that there will not be any outdoor, amplified music or speech at these events and the main source of noise would consist primarily of people talking which would be generally consistent with the existing pedestrian-oriented environment along North Wilton Place, North St. Andrews Place and West Santa Monica Boulevard. This would result in noise levels of approximately 60-65 dBA at three feet.[164] The closest covered outdoor office space to sensitive receptors would be located at a height of 373 feet, which translates to a distance of 378 feet to the closest receptor along North Wilton Place (NM3). As this distance, the noise level from people talking would be approximately 23 dBA which would be imperceptible at all off-site receptor locations.

The ground level restaurant use has outdoor tables/seating that face West Santa Monica Boulevard. As shown in Table 4.15 above, the existing noise level along West Santa Monica Boulevard is 71.4 dBA Leq. Therefore, at 60-65 dBA, the noise level from restaurant patrons talking would not exceed the existing noise levels and would also be imperceptible at all off-site receptor locations.

Therefore, impacts related to stationary noise sources would be less than significant with compliance with existing LAMC regulations. No mitigation measures are required.

163 Daikin, HVAC Acoustic Fundamentals, Application Guide 31-010, Calculating Sound Pressure fromSound Power, pg. 16.

164 California Department of Transportation, Technical Noise Supplement, October 1998. See Table IV.H-1 provided previously.

b. Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant With Mitigation Incorporated. A significant impact may occur if a project were to generate excessive vibration during construction or operation.

Per the FTA Transit Noise Impact and Vibration Assessment, vibration is the periodic oscillation of a medium or object. The rumbling sound caused by the vibration of room surfaces is called structure-borne noise. Sources of ground-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne sound, ground-borne vibrations may be described by amplitude and frequency.

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings, but is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Instead, the human body responds to average vibration amplitude often described as the root mean square (RMS). The RMS amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body. Decibel notation (VdB) is commonly used to measure RMS. Decibel notation (VdB) serves to reduce the range of numbers used to describe human response to vibration. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receivers for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment.

The background vibration-velocity level in residential areas is generally 50 VdB. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.[165]

Construction Vibration Standards

The City's General Plan and Municipal Code do not identify specific vibration level standards. Therefore, applicable vibration standards identified by the FTA were used in the analysis. The vibration damage criteria adopted by the FTA are shown in Table 4.17, *Construction Vibration Damage Criteria*.

165 FTA 2018. Transit Noise and Vibration Impact Assessment Manual. September. Section 5, pages 112-113. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf, accessed August 9, 2021.

Table 4.17
Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
I. Reinforced-concrete, steel or timber (no plaster)	0.50
II. Engineered concrete and masonry (no plaster)	0.30
III. Non-engineered timber and masonry buildings	0.20
IV. Buildings extremely susceptible to vibration damage	0.12
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018.	

The FTA has also adopted standards associated with human annoyance for groundborne vibration impacts for the following three land-use categories:

(1) Vibration Category 1 – High Sensitivity,

(2) Vibration Category 2 – Residential, and

(3) Vibration Category 3 – Institutional.

The FTA defines Category 1 as buildings where vibration would interfere with operations within the building, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipment includes, but is not limited to, electron microscopes, high-resolution lithographic equipment, and normal optical microscopes. Category 2 refers to all residential land uses and any buildings where people sleep, such as hotels and hospitals. Category 3 refers to institutional land uses such as schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment, but still have the potential for activity interference. The vibration criteria associated with human annoyance for these three land-use categories are shown in Table 4.18, *Groundborne Vibration Criteria for General Assessment*. No thresholds have been adopted or recommended for commercial or office uses.

Significance Criteria

The City has determined that the Project's generation of groundborne vibration or groundborne noise levels shall be considered significant if any of the following occur as a direct result of the Project.

- If short-term Project-generated construction vibration levels exceed the FTA building damage vibration criteria listed in Table 4.17 or the FTA human annoyance standards for frequent events listed in Table 4.18, *Groundborne Vibration Impact Criteria for General Assessment.*

Table 4.18
Groundborne Vibration Impact Criteria for General Assessment

Land Use Category	Frequent Events	Occasional Events	Infrequent Events
Category 1	65 VdB	65 VdB	65 VdB
Category 2	72 VdB	75 VdB	80 VdB
Category 3	75 VdB	78 VdB	83 VdB
Per FTA Transit Noise and Vibration Impact Assessment, September 2018, page 8-1, infrequent events are fewer than 30 vibration events of the same kind per day. Occasional events are between 30 and 70 vibration events of the same source per day. Frequent events are more than 70 vibration events of the same source per day. *Source: FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018.*			

Construction Vibration Impacts

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. The Project's construction activities most likely to cause vibration impacts are:

- Heavy Construction Equipment: Although all heavy mobile construction equipment has the potential of causing at least some perceptible vibration while operating close to buildings, the vibration is usually short-term and is not of sufficient magnitude to cause building damage.

- Trucks: Trucks hauling building materials to construction sites can be sources of vibration intrusion if the haul routes pass through residential neighborhoods on streets with bumps or potholes. Repairing the bumps and potholes generally eliminates the problem.

Table 4.19, *Construction Equipment Vibration Source Levels* identifies various PPV levels for the types of construction equipment that would operate during the construction of the Project. For example, as shown in Table 4.19, a vibratory roller could generate up to 0.21 PPV at a distance of 25 feet; and operation of a large bulldozer (0.089 PPV) at a distance of 25 feet (two of the most vibratory pieces of construction equipment). Groundborne vibration at sensitive receptors associated with this equipment would drop off as the equipment moves away. For example, as the vibratory roller moves further than 100 feet from the sensitive receptors, the vibration associated with it would drop below 0.0026 PPV. It should also be noted that these vibration levels are reference levels and may vary slightly depending upon soil type and specific usage of each piece of equipment.

Table 4.19
Construction Equipment Vibration Source Levels

Equipment	Peak Particle Velocity (inches/second) at 25 feet	Approximate Vibration Level (L_V) at 25 feet
Pile driver (impact)	1.518 (upper range) 0.644 (typical)	112 104
Pile driver (sonic)	0.734 upper range 0.170 typical	105 93
Clam shovel drop (slurry wall)	0.202	94
Hydromill (slurry wall)	0.008 in soil 0.017 in rock	66 75
Vibratory Roller	0.210	94
Hoe Ram	0.089	87
Large bulldozer	0.089	87
Caisson drill	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58

Source: Transit Noise and Vibration Impact Assessment, Federal Transit Administration, Table 7-4. September 2018.

Annoyance to Persons

The primary effect of perceptible vibration is often a concern. However, secondary effects, such as the rattling of a china cabinet, can also occur, even when vibration levels are well below perception. Any effect (primary perceptible vibration, secondary effects, or a combination of the two) can lead to annoyance. The degree to which a person is annoyed depends on the activity in which they are participating at the time of the disturbance. For example, someone sleeping or reading will be more sensitive than someone who is running on a treadmill. Reoccurring primary and secondary vibration effects often lead people to believe that the vibration is damaging their home, although vibration levels are well below minimum thresholds for damage potential.

Per the FTA Transit Noise and Vibration Impact Assessment Manual (September 2018), land uses sensitive to vibration include: buildings where people normally sleep, such as dwelling units, hotels, and hospitals; research and manufacturing facilities that are vibration-sensitive such as hospitals with vibration-sensitive equipment and universities conducting physical research operations; and institutions and offices that have vibration-sensitive equipment and have the potential for activity interference such as schools, churches, and doctors' offices. Further, the FTA states that commercial or industrial locations including office buildings are not included in this

category, unless there is vibration-sensitive activity or equipment within the building.[166] Therefore, annoyance-based vibration impacts to the existing commercial use located on the northeastern corner of N. St Andrews Place and Santa Monica Boulevard would be considered less than significant.

As shown in Table 4.19, vibration from frequent events can be annoying to Category 2 uses (and any buildings where people sleep) at a level 72 VdB. Per the CalEEMod modeling (provided in Appendix A), a large bulldozer and caisson drill would be the most vibratory pieces of equipment expected to be used at the Project Site. Additionally, a vibratory roller would be used during the paving phase of the ground level parking lot on the northern side of the Project Site; however, due to the location of this activity, the receptors to the north of the Site would be the only ones potentially affected. Vibration worksheets are provided in Appendix I of this document.

The nearest off-site buildings that house vibration-sensitive receptors are the residential uses located west of North Wilton Place, approximately 60 feet to the west of the Project Site boundary. The next closest vibration-sensitive receptors are located approximately 70 feet north of the Project Site boundary, on the northern side of Virginia Avenue and 70 feet to the south of the Project Site, on the south side of Santa Monica Boulevard. To be conservative, these distances represent the closest a piece of equipment could come to the building façade of the sensitive receptors as the equipment passes by the Project Site boundary. Other vibration sensitive land uses are located farther from the Project Site and would therefore experience lower impacts.

At a distance of 60 feet, use of a large bulldozer or caisson drill would be expected to generate 75.59 VdB,[167] and at a distance of 70 feet, and the use of a vibratory roller would be expected to generate 80.59 VdB.[168] As detailed in Table 4.19 above, the level at which human annoyance could occur from infrequent events would be approximately 72 VdB for residential uses. As the use of a large bulldozer or caisson drill at 60 feet from the closest residential uses to the west and the use of a vibratory roller at 70 feet from the residential uses to the north (closest to that area of activity) would exceed the 72 VdB for Category 2 land uses, the Project has incorporated mitigation to ensure that construction-based human annoyance impacts would be less than significant.

At a distance of 80 feet, use of a large bulldozer or caisson drill would generate a VdB of 71.9 and at a distance of 136 feet, use of vibratory roller would generate a VdB of 71.93. Therefore, with the Project's incorporation of mitigation measure **MM NOI-1** below, which prohibits the use of a large bulldozer or caisson drill within 80 feet of the façade of the residential uses located to the west, north and south of the Project Site, and use of a vibratory roller within 136 feet of the façade of the residential uses located north of the Project Site, annoyance-based vibration levels would no longer exceed vibration annoyance thresholds. **Therefore, with incorporation of MM**

166 FTA 2018. Transit Noise and Vibration Impact Assessment Manual. September. Section 6, page 124. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf, August 9, 2021.

167 Based on the 2018 FTA Transit Noise and Vibration Impact Assessment Manual vibration equation 7-3: Lv.distance = Lvref – 30 log (D/25), where Lv.distance is the vibration level adjusted for distance, VdB; Lvref is the source reference vibration level at 25 feet, VdB; and D = distance from the equipment to the receiver. Page 185.

168 Ibid.

NOI-1 into the Project, annoyance-based vibration impacts to the closest sensitive uses located west, north and south of the site, would be reduced to a level of less than significant.

The following mitigation measure is incorporated into the Project to reduce the annoyance to sensitive receptors from construction-related vibration levels to a level of less than significant.

Mitigation Measures

MM NOI-1: The construction contractor shall not use large bulldozer or caisson drill within 80 feet of the façade of the residential uses located west, north and south of the Project Site nor shall the construction contractor use a vibratory roller within 136 feet of the residential uses located north of the Project Site.

Architectural Damage

Vibration generated by construction activity generally has the potential to damage structures. This damage could be structural damage, such as cracking of floor slabs, foundations, columns, beams, or wells, or cosmetic architectural damage, such as cracked plaster, stucco, or tile.

Table 4.18, above, identifies a PPV level of 0.2 as the threshold at which there is a risk to non-engineered timber and masonry buildings and PPV level of 0.12 as the threshold at which there is a risk to buildings extremely susceptible to vibration damage (such as historic buildings). As identified in Section V, Cultural Resources, there are six potential historic resources in the Project's Vicinity. These resources are located at: 5623 West Virginia Avenue (approximately 70 feet from the Project Site boundary), 5638 West Santa Monica Boulevard (approximately 70 feet from the Project Site boundary), 5622 West Santa Monica Boulevard (approximately 70 feet from the Project Site boundary), 5517-5519 West Sierra Vista Avenue (located approximately 265 feet from the Project Site boundary), 5511 West Sierra Vista Avenue (located approximately 375 feet from the Project Boundary), and 1022 North Van Ness (located approximately 400 feet from the Project Boundary). The closest (non-historic) building is the Fiesta Mexicana Restaurant located on the corner of West Santa Monica Avenue and North St. Andrews Place, approximately 60 feet from the Project Site boundary.

The closest historical residential uses are 5638 West Santa Monica Avenue (70 feet to the south) and 5623 West Virginia Avenue (70 feet to the north) that would be subject to construction vibration levels of 0.019 in/sec PPV from a large bulldozer and 0.045 in/sec PPV from a vibratory roller. The threshold for historic buildings is 0.12 in/sec PPV; therefore, the historical use would not be impacted by construction vibration. Other historical land uses located farther away would have lower impacts. At a distance of 50 feet (distance from centerline of the road to the façade), the vibration level from loaded trucks would be 0.027 in/sec PPV, so there would be no vibration impact to historic buildings from construction haul trucks, either (please see vibration calculations available in Appendix I for details). The vibration level at the closest (non-historic building), the Fiesta Mexicana Restaurant's façade, would be 0.024 in/sec PPV. As stated above, the vibration threshold for this type of non-engineered timber and masonry building is 0.2 in/sec PPV. Therefore, as the vibration levels are well under the FTA damage thresholds, no nearby buildings will be impacted by construction-related vibration. **Impacts from construction-related**

groundborne vibration to buildings is considered to be less than significant with incorporation of the mitigation measure.

Operational Vibration

The Project proposes the construction of a new, approximately 510,621-square-foot production studio and creative office campus on top of a subterranean parking structure. The Project would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large manufacturing and industrial projects. Groundborne vibrations at the Project Site and immediate vicinity currently result from heavy-duty vehicular travel (e.g., refuse trucks, delivery trucks and transit buses) on the nearby local roadways, and the proposed land uses at the Project Site would not result in a substantial increase of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the Project Site, these trips would typically only occur once a week and would not be any different than those presently occurring in the vicinity of the Project Site. Medium- and heavy-duty type delivery trucks are anticipated to intermittently visit the site as needed; however, the number of these truck trips are not expected to be more than 10 to 40 per day and would not cause vibrational impacts, as the FTA does not consider trucks or buses to be to be a significant source of vibration unless there are bumps due to frequent potholes in the road.[169] **As such, vibration impacts associated with operation of the Project would be less than significant and no mitigation measures are required.**

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

No Impact. The Project Site is located approximately 7.4 miles southeast of the Hollywood-Burbank Airport (2627 North Hollywood Way), which is the closest airport. However, the Project Site is not located within the Planning Boundary/Influence Area of the Hollywood-Burbank Airport including within the Runway Protection Zone or Airport Land Use Plan Noise Contour, which establishes the area susceptible to noise levels that would exceed the annoyance threshold for noise (defined as >65 CNEL for commercial airports such as the Hollywood-Burbank Airport).[170] Moreover, the Project Site is not located within an existing or projected noise contour associated with any private or public airport.[171] **Therefore, no impacts would occur and no mitigation measures are required**.

169 FTA 2018. Transit Noise and Vibration Impact Assessment Manual. September. Page 113.

170 Los Angeles County, Airport Land Use Commission, Burbank/Glendale/Pasadena Airport, Airport Influence Area Map, May 13, 2003, accessed September 2021.

171 Los Angeles County Airport Land Use Commission, Los Angeles County Airport Land Use Plan, Airport Influence Area figures, adopted December 19, 1991, revised December 4, 2004; accessed: April 2021.

XIV. POPULATION AND HOUSING

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

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

Less Than Significant Impact. The Project is a commercial development consisting of commercial and office uses. Since the Project does not propose a housing component, it would not directly induce a new residential population that would contribute to population growth in the vicinity of the Project Site. Additionally, while construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Furthermore, it is likely that the construction workers employed for the construction of the Project would be taken from the labor pool currently residing in the Los Angeles metropolitan region that moves from project to project. Given the short duration of the work for each job, and the large size and mobility of the construction labor pool that can be drawn upon in the region, construction workers would not be expected to relocate their residences within this region or move from other regions into this region in response to the short-term Project-related construction employment opportunities and, therefore, no new permanent residents would be generated during construction of the Project. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project.

Operation of the Project would generate new employment positions, which could result in increased population growth in the area. As discussed in Section 3, Project Description, of this IS/MND, the Project includes the development of an approximately 510,621-square-foot production studio and creative office campus with approximately 109,957 square feet of production studios and related support space, 388,286 square feet of creative office, and 12,378 square feet of restaurant space. The Project would provide approximately 981 vehicular parking spaces provided on-site in a two-level subterranean parking garage and approximately 162

bicycle spaces in the first subterranean parking garage level and on the ground floor. The Project would be built on a 225,456-square-foot lot, resulting in a site-wide FAR of up to 2.26 to 1 and up to six stories and 93 feet in height. As the Project would remove the existing approximately 98,352 square feet of retail use, the Project would result in a net increase in floor area of 412,269 square feet. Based on employee generation rates promulgated by the City of Los Angeles VMT Calculator Documentation, the Project's net increase in floor area of 412,269 square feet would generate approximately 1,649 net new employees.[172] 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 in and outside of the City.

According to SCAG's 2020-2045 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2020 is approximately 1,887,969 employees.[173] In 2025, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,937,555 employees.[174] Therefore, the projected employment growth in the City between 2020 and 2025 based on SCAG's 2020–2045 RTP/SCS is approximately 49,586 employees. The Project's 1,649 estimated net new employees would constitute approximately 3.33 percent of the employment growth forecasted between 2020 and 2025.

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

172 Source for generation rate: City of Los Angeles VMT Calculator Documentation, Version 1.3, LADOT, Los Angeles Department of Transportation and Los Angeles Department of City Planning, Table 1, Land Use and Trip Generation Base Assumptions, May 2020. Accessed April 19, 2021. Office 412,269 square feet/1,000*.4.0 employees/sf=1,649 net new employees.

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

174 SCAG. ConnectSoCal (2020-2045 RTP/SCS), Demographics and Growth Forecast Appendix, Table 14, page 35. Based on a linear interpolation of 2016 and 2045 data. The 2025 extrapolated value is calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to 2025: ((2,135,900 – 1,848,300) / 29) * 10) + 1,848,300 = 1,937,555.

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

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

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

No Impact. The Project Site is currently improved with a surface parking lot and the former three-story Sears building originally constructed in 1928 and consisting of approximately 98,352 square feet. Thus, the Project would not displace existing people or housing, as no residences currently exist on the Project Site. **Therefore, no impacts would occur and no mitigation measures are required**.

XV. PUBLIC SERVICES

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

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

a. Fire protection?

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. The City of LAFD considers fire protection services for a project to be adequate if a project is within the maximum response distance for the land use proposed. Pursuant to LAMC Section 57.507.3.3, the maximum response distance between high-density residential land uses (which is likely the most appropriate land use category for the Project) and a LAFD fire station that houses an engine company is 1.5 miles, and 2.0 miles from a station that houses a truck company. If this distance is exceeded, all structures located in the applicable residential area would be required to install automatic fire sprinkler systems.

Construction

Construction on the Project Site would increase the potential for accidental fires from sources such as mechanical equipment and flammable construction materials. Given the nature of construction activities and the work requirements of construction personnel, OSHA has developed safety and health provisions for implementation during construction, which are set forth in Title 29 Code of Federal Regulations, Part No. 1926. In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by OSHA.[175] Additionally, in accordance with the provisions established by OSHA, fire suppression equipment (e.g., fire extinguishers) specific to construction would be required on-site.[176] The transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, state, and Federal regulations governing such activities. The Project would be required to implement standard best management practices (BMPs) set forth by the City and the RWQCB, which would ensure that waste generated during the construction process is disposed of properly. Compliance with these regulatory requirements would effectively reduce the potential for Project construction activities to create a substantially increased demand for LAFD services by exposing people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Project construction could also potentially increase the demand on LAFD services in the vicinity of the Project Site on the surrounding roadways. Specifically, while most construction activities are expected to be primarily contained within the boundaries of the Project Site, construction activities associated with the installation of new driveways and sidewalks, as well as improvements to curbs, gutters, etc., would encroach into the public rights-of-way (e.g., sidewalks and roadways) adjacent to the Project Site. As such, segments of the existing sidewalks surrounding the Project Site would be temporarily closed during construction. However, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period, and emergency access would be maintained. In addition, the Project would prepare a Construction Management Plan (see **PDF TR-1** in Section XVII, Transportation) that would address traffic and access control during construction. As detailed in **PDF TR-2**, emergency access would be maintained to ensure that adequate and safe access would remain available within and near the Project Site during all construction activities. **PDF TR-2** includes safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate and maintaining safe routes to schools.

With the incorporation of **PDF TR-2** into the Project, Project construction would not create increased demand on LAFD services on roadways surrounding the Project Site.

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175 United States Department of Labor, Occupational Safety & Health Administration, Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention.

176 United States Department of Labor, Occupational Safety & Health Administration, Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention.

Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Accordingly, although construction activities would be short-term with varied intensities requiring varied levels of traffic, Project construction activities could temporarily impact emergency access. However, with implementation of **PDF TR-2**, the majority of construction-related traffic, including hauling activities and construction worker trips, would occur outside the typical weekday commuter AM and PM peak periods, thereby reducing the potential for traffic-related conflicts. The Project would also employ temporary traffic controls, such as flag persons, to control traffic movement during temporary traffic flow disruptions. Traffic management personnel are trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, dedicated turn lanes for construction trucks, re-routing of construction trucks to reduce travel on congested streets, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Additionally, haul truck staging would be prohibited on any streets adjacent to the Project Site, unless specifically approved as a condition of an approved haul route. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. With the incorporation of **PDF TR-1** into the Project, Project construction equipment, haul trucks and worker vehicles would not create increased demand on LAFD services.

Moreover, construction impacts are temporary in nature and do not cause lasting effects that would create increased demand on LAFD fire protection services. Accordingly, Project construction would not adversely affect firefighting and emergency services to the extent that new, expanded, consolidated, or relocated fire facilities would be needed in order to maintain response distances, emergency access, or other performance objectives of the LAFD.

Given the short-term nature of construction, the controlled nature of the construction activities, and the fire stations that are readily available to serve the Project Site, Project construction would not require the provision of or need for new or altered fire protection facilities, in order to maintain acceptable fire services.

Operation

LAFD does not determine the adequacy of fire protection based on response times or number of EMS or fire-related incidents. The following analysis evaluates the major criteria for determining the impacts of the Project to fire protection services, including proposed land uses and project components, and compliance with standards set forth in the Los Angeles Building Code and Fire Code, particularly as they pertain to response distance for engine and truck companies, fire hydrant standards and fire flow, emergency access/evacuation, and any other site- or project-specific requirements pursuant to the LAMC.

Land Uses and Project Components

The Project would result in an increase in the intensity of land uses at the Project Site, which could potentially increase the demand for LAFD fire protection and emergency medical services.

The proposed uses would be expected to generate a range of fire service calls similar to other studio, office, and restaurant uses that would potentially include electrical fires, grease fires, etc. However, the Project would not include any unique or especially hazardous components, such as heavy industrial uses, that use or generate large quantities of hazardous and/or flammable materials. Additionally, filming activities would be subject to the LAFD's Studio/Sound Stage Fire & Life Safety Requirements,[177] and special effects such as pyrotechnics would be required to be permitted through LAFD's Film Unit.[178] Accordingly, appropriate safety protocols and equipment would be in place, and the types of fires that could potentially occur within the Project Site would likely be adequately suppressed with the fire equipment provided on-site combined with that available at the fire stations nearest the Project Site.

Compliance with Building Code and Fire Code

The Project would be required to comply with, and implement, all applicable Los Angeles Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage, and management of hazardous materials, alarm and communications systems, etc., as well as any Project- and/or site-specific conditions that may be set forth by the LAFD as part of their fire/life safety plan review and fire/life safety inspection pursuant to LAMC Section 57.111.[179] Compliance with applicable Building Code and Fire Code requirements and LAFD conditions would be confirmed prior to the issuance of a building permit. Such regulatory requirements and conditions are intended to ensure that adequate fire prevention features that reduce the demand on LAFD facilities and equipment are provided. Therefore, through the incorporation of such features into the Project, the Project would minimize the potential for incidents requiring emergency response by the LAFD and thereby reduce the need for a new fire station or the expansion, consolidation, or relocation of an existing fire station.

In addition, in accordance with Objectives 9.16 and 9.18 set forth in the Framework Element, Policy 2.1.6 set forth in the Safety Element, and Objective 5 and Fire Protection Policy 1 set forth in the Hollywood Community Plan, the City and the LAFD continue to monitor the overall demand for existing and projected fire protection and emergency response services and coordinate the development of new fire facilities to be phased with growth. As discussed in Section XIV, Population and Housing, of this IS/MND, the Project would not induce substantial unplanned population growth. Furthermore, if new, expanded, or relocated fire protection facilities are needed in the future, the construction, expansion, or relocation of such facilities would be required to undergo environmental review pursuant to CEQA separate from this environmental review of

177 Los Angeles Fire Department, Film Unit, https://www.lafd.org/film-unit, accessed November 2022.

178 Los Angeles Fire Department, Film Unit, https://www.lafd.org/film-unit, accessed November 2022.

179 Ralph M, Terraza, Fire Chief, Los Angeles Fire Department, VTT 83478: 5601 Santa Monica Boulevard, February 3, 2022.

the Project, and any associated physical impacts of such facilities would be addressed at that time as necessary.

Response Distance and Time

As shown in Table 4.20, *Fire Stations Serving the Project Site*, the primary station serving the Project Site is Fire Station No. 52 located at 4957 Melrose Avenue, approximately 0.5-mile southeast of the Project Site. Fire Station No. 52 includes an engine and an advanced life support rescue ambulance. The secondary stations that could respond to the Project Site are Station Nos. 6, 27, 35, 82. Fire Station No. 52's engine company is located approximately 0.5-mile southeast of the Project Site and Fire Station No. 27's truck company is located approximately 1.0-mile northwest. Although the Project would be within the response distance criteria established by the LAMC, the Project would also be fully sprinklered. The sprinklers would be automatic and would be designed and installed pursuant to National Fire Protection Association (NFPA) standards.

Table 4.20
Fire Stations Serving the Project Site

Fire Station and Address	Distance to Project Site (miles)	Equipment & Services
Fire Station No. 52 4957 Melrose Avenue	0.5 SE	Engine 52; EMS Rescue Ambulance 52 (ALS)
Fire Station No. 82 5769 Hollywood Boulevard	0.7 N	Engine 82; EMS Rescue 82 (ALS)
Fire Station No. 27 1327 North Cole Avenue	1.0 NW	Engine 27; Truck 27; EMS Rescue Ambulance 27 (ALS); Engine 227; USAR 27; EMS Rescue 827 (BLS) Light Force: Truck 27 + Engine 27 or Engine 227 responding together Task Force: Truck 27 + Engine 27 and Engine 227 responding together
Fire Station No. 35 1601 North Hillhurst Avenue	1.5 NE	Engine 35; Truck 35; EMS Rescue 35 (ALS); Engine 235 Light Force: Truck 35 + Engine 35 or Engine 235 responding together Task Force: Truck 35 + Engine 35 and Engine 235 responding together Brush Clearance Unit
Fire Station No. 6 326 North Virgil Avenue	1.7 SE	Engine 6; EMS Rescue Ambulance 6 (ALS), EMS Rescue Ambulance 806 (BLS)

Notes: SE = southeast; NW = northwest; NE = northeast; N = north; EMS = emergency medical services; ALS = advanced life support; BLS = basic life support; USAR = Urban Search and Rescue

Sources: Los Angeles Fire Department, Find Your Station Website, https://www.lafd.org/fire-stations/station-results, accessed August 15, 2022; and California Fire and EMS, http://www.cafirefighters.com/lafd.htm, accessed August 15, 2022.

Response time relates directly to the physical linear travel distance (i.e., the number of roadway-miles between a fire station and a specific location) and the LAFD's ability to successfully navigate

the given roadway network. Response times are measured from the time the dispatcher receives a call for service to the time the LAFD arrives at the site. Therefore, roadway congestion, intersection level of service (LOS), weather conditions, and construction traffic along a response route can affect response time. Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of a path of an emergency vehicle. Additionally, the LAFD, in collaboration with LADOT, has developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response.[180] The City of Los Angeles has over 205 miles of major arterial routes that are equipped with FPS.[181]

The LAFD created FireStatLA in 2014 to track and evaluate response time data in order to improve response times Citywide. Table 4.21, *Average EMS, Fire, and Non-EMS Response Times*, presents the average response times for the primary and secondary fire stations serving the Project Site based on FireStatLA response metrics from January through July 2022. As shown in Table 4.21, the response times for the fire stations identified as serving the Project Site are generally similar to the Citywide averages.

Table 4.21
Average EMS, Fire, and Non-EMS Response Times

Fire Station	Average Response Time to EMS Incident (minutes:seconds)	Average Response Time to Structure Fire Incident (minutes:seconds)	Average Response Time to Non-EMS Incident (minutes:seconds)
Fire Station No. 52	6:44	4:59	6:27
Fire Station No. 82	7:15	5:12	6:51
Fire Station No. 27	6:59	5:08	6:06
Fire Station No. 35	6:32	5:05	6:03
Fire Station No. 6	7:01	4:59	6:25
Citywide	7:13	5:23	6:53

Source: Los Angeles Fire Department, FireStatLA, https://lafd.org/fsla/stations-map, January through July 2022, accessed: August 16, 2022.

It should be noted that the LAFD has not established response times standards for emergency response, nor has it adopted the NFPA standard of 5 minutes for EMS response and 5 minutes, 20 seconds for fire suppression response.[182] According to the LAFD, although response time is considered to assess the adequacy of fire protection services, it is only one factor among several that LAFD utilizes in considering its ability to respond to fires and life and health safety

180 Los Angeles Department of Transportation, Los Angeles Signal Synchronization Fact Sheet.

181 Los Angeles Fire Department, Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles, Bulletin No. 133, October 2008.

182 NFPA, NFPA 1710—Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, 2020 Edition.

emergencies including required fire flow, response distance from existing fire stations, and the LAFD's judgment for needs in an area. If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment, and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. In conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board Trustee of California state University* (2015) ruling, the City has and will continue to meet its legal obligations to provide adequate public safety services, including fire protection and emergency medical services.

Fire Flow

Domestic and fire water service to the Project Site would continue to be supplied by LADWP. Fire flow to the Project Site would be required to meet City fire flow requirements as set forth in LAMC Section 57.507.3.1, which establishes fire flow standards by development type. As identified in the LAMC, commercial land uses such as those proposed by the Project are required to achieve a fire flow rate of 6,000 to 9,000 gpm from four to six hydrants flowing simultaneously. Additionally, fire hydrants must be spaced to provide adequate coverage of the building exterior, as set forth in Section 57.507.3.2 of the LAMC, and must deliver a minimum pressure of 20 psi at full flow. The Project Site is approximately 510,621 square feet and there are 7 fire hydrants located on the streets surrounding the Project Site:

- One fire hydrant located in the southeastern corner of the Project Site at the intersection of West Santa Monica Boulevard and Western Avenue;
- One fire hydrant located to the south of the Project Site across West Santa Monica Boulevard, at the southwestern corner of West Santa Monica Boulevard and Wilton Place;
- One fire hydrant located to the south of the Project Site across West Santa Monica Boulevard, mid-block between Wilton Place to the west and St. Andrews Place to the east;
- One fire hydrant located to the south of the Project Site across West Santa Monica Boulevard at the southwestern corner of West Santa Monica Boulevard and North St. Andrews Place;
- One fire hydrant located to the south of the Project Site across West Santa Monica Boulevard, mid-block between North St. Andrews Place to the west and Western Avenue to the east;
- One fire hydrant located to the west of the Project Site across Wilton Place at the southwestern corner of West Virginia Avenue and North Wilton Place;
- One fire hydrant located to the north of the Project Site across West Virginia Avenue at the northwestern corner of West Virginia Avenue and North St. Andrews Place.

The final fire flow required for the Project would be established by the LAFD during its review of the Project plot plan, prior to the issuance of a building permit by the City.[183] The adequacy of existing water pressure and availability in the Project area with respect to required fire flow and hydrant spacing would be confirmed by LAFD during the plan check review process. Approval of a plot plan identifying the minimum fire flow requirements, locations of hydrants, and upgrades to water main lines would ensure the requisite fire flow for the Project Site.

Installation of all water meters would be done by LADWP and would include new hot taps, laterals, and detector checks for the meter. Fire service water would be piped into the building from the meter. Backflow preventers, fire water tanks and fire pumps would be documented on the plumbing drawings, prepared at the time the building design is submitted to the City and LAFD for review. Review of project plans is intended to ensure compliance with fire hydrant standards and fire flow requirements and would ensure that the LAFD would have adequate resources for fire protection services at the Project Site.

Emergency Access and Evacuation

Emergency vehicle access to the Project Site would be provided from the roadways adjacent to the Project Site. Specifically, the Project would include four two-way vehicular driveways: two located along West Virginia Avenue; one located along North Wilton Place; and one along North St. Andrews Place. In addition, the Project would provide one at-grade, drop-off roundabout driveway along North Wilton Place and a second along North St. Andrews Place. The Project's driveways and internal circulation have been designed in accordance and consultation with the LAFD to meet all applicable Los Angeles Building Code and Fire Code requirements. Compliance with such requirements would be confirmed as part of the LAFD's fire/life safety plan review and fire/life safety inspection pursuant to LAMC Section 57.118, prior to the issuance of any building permit. In addition, the Project would not include the installation of any barriers that could impede emergency vehicle access and does not require or propose the permanent re-routing or closure of any public roadway. As such, emergency access to the Project Site and the surrounding area would be maintained and the Project would not interfere with emergency evacuation of the vicinity. Furthermore, upon completion of the Project and pursuant to LAMC Section 57.106.5.2, the LAFD would be provided with a diagram of each portion of the property, and this diagram would include access routes and any additional information that may facilitate LAFD response to the Project Site. As such, emergency access to the Site and surrounding vicinity would be maintained at all times.

Other Fire Protection Facilities

The Project would be required to comply with emergency helicopter landing facility requirements of the LAMC and the LAFD. Pursuant to LAMC Section 57.4705.4 and LAFD Requirement No. 10, high rise buildings are required to install emergency helicopter landing facilities. However, in

183 Ralph M, Terraza, Fire Chief, Los Angeles Fire Department, VTT 83478: 5601 Santa Monica Boulevard, February 3, 2022.

lieu of such landing facilities, high rise buildings greater than 75 feet but less than 120 feet, such as the Project, may alternatively install the following additional life safety features:[184]

- A fire service access elevator as required in the 2013 California Building Code Section 403.6.1 and Section 3007;
- Two stairways with roof access through a penthouse that complies with the 2014 Los Angeles Building Code Section 91.1509.2;
- Enclosed elevator lobbies in accordance with 2014 Los Angeles Fire Code Section 57.4705.1; and
- Escalator openings or stairways that are protected by approved power-operated automatic shutters at every penetrated floor, if they are not part of the means of egress system and connect to more than two stories, in conformance with 2014 Los Angeles Building Code Section 91.712.1.3.2.

The Project would provide an alternative pursuant to Regulation 10 upon demonstration that it meets the required building design requirements. Installation of all elevators, lobbies, and stairways would be conducted in compliance with Los Angles Building Codes and Fire Codes and would be documented on the Project's architectural drawings, prepared at the time the building design is submitted to the City and LAFD for review. Consultation with the City and LAFD prior to the issuance of building permits would ensure that the Project adequately complies with LAMC Section 57.4705.4.

Based on the above, the Project would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service levels and the Project would not interfere with or otherwise inhibit LAFD emergency access or evacuation of the Project Site or surroundings. **Therefore, impacts on the fire services would be less than significant.**

b. Police protection?

Less Than Significant Impact. A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective.

The Project Site is located in the LAPD's West Bureau. The West Bureau covers a 124-square-mile area with roughly 840,400 people between Forest Lawn Drive to the north, Normandie Boulevard to the east, El Segundo Boulevard to the south, and the Pacific Ocean to the west. The West Bureau oversees operations in the Hollywood, Wilshire, Pacific, and West Los Angeles communities. The West Bureau also oversees operations of the West Traffic Division, which is responsible for investigating traffic collisions and traffic-related crimes for all operations in the

184 Los Angeles Fire Department, Office of the Fire Marshal, Los Angeles Fire Department Requirement No. 10, revised November 17, 2014.

West Bureau and includes the neighborhoods of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and the Miracle Mile.[185]

The Project Site is currently served by the Hollywood Community Police Station (Hollywood Station), located at 1358 North Wilcox Avenue, approximately 1.0-mile northwest of the Project Site, within Reporting District (RD) 668.[186] The Hollywood Station serves an approximately 17.2-square-mile area with approximate borders of Mulholland Drive on the north, Normandie Avenue on the east, Beverly Boulevard on the south, and West Hollywood on the west.[187] The Hollywood Station serves the Argyle, Cahuenga Pass, East Hollywood, Hobart, Hollywood, Hollywood Hills, Hollywood/La Brea, Little Armenia, Los Feliz, Melrose District, Mount Olympus, Sierra Vista, Spaulding Square, Sunset Strip, Thai Town, and Vine/Willoughby communities and includes the Chinese Theater, the Hollywood Sign, the Melrose Avenue shopping district, and the Hollywood Bowl.[188]

The Hollywood Community Police Station has 387 sworn personnel and 15 civilian support staff and provides service to a population of approximately 300,000 residents.[189] When situations arise requiring increased staffing, additional officers can be called in from other LAPD community police stations. Additionally, there are special service teams available within the LAPD to serve the Hollywood area. No official standard has been set by the City with respect to officer-to-population ratio.

Construction

Construction of the Project would not generate a permanent population on the Project Site that would substantially increase the police service population of the Hollywood Station. In addition, pursuant to **PDF POL-1**, the Project would implement appropriate temporary security measures including security fencing (e.g., chain-link fencing), low-level security lighting and locked entry (e.g., padlock gates or guard restricted access) to limit access to the Site by the general public. Regular and multiple security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) would also be provided. With implementation of these security measures, the potential demand for police protection services at the Project Site during

185 Los Angeles Police Department, West Bureau, About West Bureau, https://www.lapdonline.org/lapd-contact/west-bureau/hollywood-community-police-station/?zip=5601%20Santa%20Monica%20boulevard%20Los%20Angeles%20%20ca, accessed August 18, 2022.

186 Los Angeles Police Department, West Bureau, About West Bureau, https://www.lapdonline.org/lapd-contact/west-bureau/hollywood-community-police-station/?zip=5601%20Santa%20Monica%20boulevard%20Los%20Angeles%20%20ca, accessed August 18, 2022.

187 Los Angeles Police Department, Hollywood Community Police Station, Division Map, https://lapdonlinestrgeacc.blob.core.usgovcloudapi.net/lapdonlinemedia/2021/03/HWD11x17.pdf, accessed August 18, 2022.

188 Los Angeles Police Department, Hollywood Community Police Station, Station Info and About, https://www.lapdonline.org/lapd-contact/west-bureau/hollywood-community-police-station/, accessed August 18, 2022.

189 Officer Alfonso Velasco, CPD, Community Outreach and Development Division, Los Angeles Police Department.

construction would be reduced and Project construction would not contribute to an increased demand for police protection services.

Project construction activities would also have the potential to affect LAPD response due to traffic associated with the movement of construction equipment, hauling of demolition and graded materials, and construction worker trips. Additionally, construction activities may involve temporary lane closures. Other potential effects of construction-related traffic could include increased travel time due to flagging or stopping traffic to accommodate trucks entering and exiting the Project Site during construction. As such, construction activities could potentially affect emergency response for police protection services that may be responding to the Project Site or other uses in the vicinity of the Project Site. Additionally, while most construction activities would be contained within the boundaries of the Project Site, it is expected that the installation of new driveways and sidewalks, as well as improvements to curbs and gutters, and connections to utility infrastructure would encroach into the public rights-of-way (e.g., sidewalks and roadways) adjacent to the Project Site. As such, segments of the existing sidewalks surrounding the Project Site would be temporarily closed during construction. Although long-term travel lane closures on adjacent roadways would not be anticipated during any phase of construction, short-term travel lane closures of one to three days may be required for improvements to the adjacent sidewalks and roadways (i.e., during the concrete pour days).

However, emergency access would be maintained to the Project Site and vicinity during construction through marked emergency access points approved by the LAPD, and a Construction Traffic Management Plan would be implemented during Project construction pursuant to **PDF TR-2** (see Section XVII, Transportation, of this IS/MND) to ensure that adequate and safe access is available within and near the Project Site during construction activities. Pursuant to **PDF TR-2**, the Project would employ temporary traffic controls, such as flag persons, to control traffic movements during temporary traffic disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g. signs, flag persons, etc.) would also be utilized, as necessary, to ensure that emergency access to the Project Site and other land uses in the vicinity is maintained on adjacent rights-of-way. In addition, the drivers of emergency vehicles have the ability to avoid traffic by using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Signs would also be posted advising pedestrians of temporary sidewalk closures and of alternative routes.

Moreover, the LAMC restricts construction activities to the hours of 7:00 A.M. to 9:00 P.M. on weekdays and from 8:00 A.M. to 6:00 P.M. on Saturdays and holidays, and prohibits all construction activities on Sundays. The hours of construction typically require workers to be on-site before the weekday A.M. commuter peak period and allow them to leave before or after the P.M. commuter peak period (i.e., arrive at the site prior to 7:00 AM and depart before 4:00 P.M. or after 6:00 P.M.). Because a majority of construction traffic would occur during off-peak hours, and is temporary in nature, Project construction is not expected to cause a significant traffic impact at any of the analyzed intersections. Therefore, with the incorporation of **PDF POL-1 and PDF**

TR-1, the Project's construction would not contribute to an increased demand on police protection services.

Operation

LAPD considers the residential population within a given service area when evaluating service capacity. As such, as no residential uses are proposed, the Project would not introduce a new residential population within the Hollywood Station service area. Therefore, the Project would not increase the LAPD service population in the Hollywood Division.

Although the Project would not alter the officer-to-population service ratio, the Project may introduce a new employee and visitor population (i.e., "daytime" population) to the Project Site, potentially increasing the demand for police protection services within the Hollywood Station service area. However, as detailed above in **PDF POL-2** and **PDF POL-3**, the Project would include numerous operational design features to enhance safety within and immediately surrounding the Project Site, which would reduce the demand for police protection services. In particular, as set forth in **PDF POL-2**, the Project would include a 24-hours-a-day/7-days-a-week security program to ensure the safety of its employees and site visitors. This security program would include on-site security personnel to monitor entrances and exits, patrol the perimeter of the property, control and monitor activities in the public spaces; manage and monitor fire/life/safety systems, and control and monitor activities in the parking facilities, as well as the installation of security lighting and cameras. In addition, pursuant to **PDF POL-3**, prior to the issuance of a building permit, the Applicant would consult with the LAPD regarding the incorporation of additional feasible crime prevention features. These proposed security features of the Project would reduce any increase in demand for police protection services within the Hollywood Station service area that could result from operation of the Project. Overall, the Project would not require any special police protection services and would not result in the need for new or altered police facilities.

In addition, in accordance with Objectives 9.13 and 9.14 set forth in the Framework Element and Objective 5 set forth in the Hollywood Community Plan, the City and the LAPD would continue to monitor the overall demand for existing and projected police protection services and coordinate the development of new police facilities to be phased with growth. As discussed in Section XIV, Population and Housing, of this IS/MND, the Project would not induce substantial unplanned population growth. Furthermore, if new, expanded, or relocated police protection facilities were needed in the future, the construction, expansion, or relocation of such facilities would be required to undergo environmental review pursuant to CEQA separate from the environmental review for this Project, and any associated physical impacts would be addressed at that time as necessary.

In addition, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new police station facilities and related staffing, as deemed appropriate.

The average response time to high priority emergency calls (Code 3) for service in the Hollywood Station service area during 2020 was 3.8 minutes. The average response time for medium high priority emergency calls (Code 2) for service in the Hollywood Station service area during 2020

was 12.1 minutes.[190] With regard to the potential for Project traffic to increase emergency vehicle response times within the Hollywood Station service area due to increased congestion, police units are most often in a mobile state; therefore, it is unknown precisely which route the LAPD would use to access the Project Site and surrounding vicinity when responding to an emergency call. Pursuant to **PDF POL-4**, prior to the issuance of a certificate of occupancy following completion of Project construction, the Project Applicant would submit a diagram of the Project Site to the LAPD showing access routes and other information to facilitate police response to the Project Site. Moreover, pursuant to CVC Section 21806, the police have a variety of options to avoid traffic in the event of an emergency, such as using sirens to clear a path of travel for driving in the lanes of opposing traffic. Therefore, Project operation would not cause a substantial increase in emergency response times due to traffic congestion.

Based on the above, through the implementation of Project Design Features related to ensuring a secure and safe Project Site during both construction and operation, as well as consultation with the LAPD for secure design, the Project would not significantly increase the demand for police protection services within the Hollywood Station service area or Citywide. In addition, the Construction Traffic Management Plan and the submittal of a Site diagram to the LAPD upon completion of the Project would ensure that emergency response and access to the Project vicinity would be maintained and facilitated during both construction and operation, respectively. As such, neither Project construction nor Project operation would generate a demand for additional police protection services that would necessitate the provisions of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives for police protection. Accordingly, the Project would not result in adverse physical impacts associated with the construction of new or altered police protection facilities. **Therefore, impacts would be less than significant and no mitigation measures would be required.**

Project Design Features

PDF POL-1: During construction, the Project will implement appropriate temporary security measures including security fencing (e.g., chain-link fencing), low-level security lighting and locked entry (e.g., padlock gates or guard restricted access) to limit access by the general public. Regular and multiple security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) will also be provided. During construction activities, the Contractor will document the security measures; and the documentation will be made available to the Construction Monitor.

PDF POL-2: The Project will provide an extensive 24-hours-a-day/7-day-a-week security program during Project operations to ensure the safety of employees and other visitors to the Project Site. The Project will incorporate strategies in design and planning, as well as active security features. On-site security measures during Project operation will include:

[190] Officer Alfonso Velasco, CPD, Community Outreach and Development Division, Los Angeles Police Department.

- Provision of on-site security personnel whose duties will include but not be limited to the following:
    - Monitoring entrances and exits;
    - Patrolling the perimeter of the property;
    - Controlling and monitoring activities in the public spaces;
    - Managing and monitoring fire/life/safety systems; and
    - Controlling and monitoring activities in the parking facilities.
- Installation of industry standard security lighting at recommended locations including parking areas, pathways, and curbside drop-off areas;
- Installation of closed-circuit security cameras at select locations including (but not limited to) entry and exit points, lobby areas, outdoor open spaces, and parking areas;
- Provision of adequate lighting of parking areas, elevators, and lobbies to reduce areas of concealment;
- Provision of lighting of building entries and open spaces to provide pedestrian orientation and to clearly identify a secure route between the parking areas and access points; and
- Prominent posting of contact information for on-site security staff throughout the Project Site.

PDF POL-3: Prior to the issuance of a building permit, the Project Applicant or its successor will consult with LAPD's Crime Prevention Unit regarding the incorporation of any additional crime prevention features appropriate for the design of the Project.

PDF POL-4: Upon completion of Project construction and prior to the issuance of a certificate of occupancy, the Applicant will submit a diagram of the Project Site to LAPD's Hollywood Division Commanding Officer that includes access routes and any additional information that might facilitate police response.

c. Schools?

Less Than Significant Impact. The Project is in an area that is currently served by several Los Angeles Unified School District (LAUSD) public schools, as well as several private schools and after-school programs. The LAUSD jurisdiction encompasses an area of 720 square miles and

serves approximately 600,000 students and operates over 1,000 schools.[191] The LAUSD is divided into six local districts and the Project Site is located within Local District West.[192]

The following LAUSD schools currently serve the Project Site:

- **Hollywood Elementary School:** located 0.5 mile northwest at 1115 Tamarind Avenue (grades expanded transitional kindergarten (ETK)-5th),
- **Kingsley Elementary School:** located 0.6 mile northeast at 5200 West Virginia Avenue (grades ETK-5th),
- **Joseph Le Conte Middle School:** located 0.6 mile northwest at 1316 North Bronson Avenue (grades 6th-8th), and
- **Helen Bernstein Senior High School:**[193] located 0.5 mile northwest at 1309 North Wilton Place (grades 9th-12th).

The Project proposes the construction of a new approximately 510,621-square-foot production studio and creative office campus. As shown in Table 4.22, *Project Student Generation*, the Project could potentially increase the local student population by approximately 251 new students. These students would be expected to attend the above-listed LAUSD schools that serve the Project Site. However, students can also attend non-LAUSD schools.

The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. Development fees are required to be paid pursuant to development conditions of approval. Pursuant to SB 50, the payment of these school fee amounts provided for in Government Code Sections 65995, 65995.5, and 65995.7 would constitute full and complete mitigation for school facilities. That is to say, SB 50 states that the exclusive method of mitigating the impact of school facilities according to CEQA is to pay the maximum school fees and that such fees are "deemed to provide full and complete school facilities mitigation" related to the adequacy of school facilities when considering approval or the establishment of conditions for the approval of a development project (Government Code 65996[a] and [b]).

Pursuant to California Government Code Section 65995.5-7, the LAUSD has Level 1 Fees on commercial development at a rate of $0.66 per square foot of new commercial construction within the boundaries of the LAUSD.[194] Accordingly, project applicant(s) are required to pay school fees to LAUSD to offset the impact of additional student enrollment at schools serving the project area.

191 Los Angeles Unified School District, http://achieve.lausd.net/about, accessed September 2021.
192 Los Angeles Unified School District, LAUSD Maps, https://achieve.lausd.net/domain/34, accessed September 2021.
193 Los Angeles Unified School District, Explore, https://explorelausd.schoolmint.net/school-finder/home, accessed September 2021.
194 2020 Developer Fee Justification Study, Los Angeles Unified School District, March 2020, https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/921/LAUSD%20Dev%20Fee%20Study%202020_Final.pdf, accessed September 2021. These rates are subject to change.

Table 4.22
Project Student Generation

Land Use	Size	Students Generated[a]			
		Elementary (K-6)	Middle School (7-8)	High School (9-12)	Total
Existing Uses					
Retail	98,352 sf	19	5	11	35
Total Existing Students					
Proposed Uses					
Office Use	388,286	138	34	74	246
Restaurant Use	12,378 sf	3	1	1	5
Production Uses	109,957 sf	19	5	11	35
Total Projected Students		***160***	***40***	***86***	***286***
Total Existing Students		*19*	*5*	*11*	*35*
Total Net New Students[b]		**141**	**35**	**75**	**251**

Note: du = dwelling unit; sf = square feet

[a] *Based on student generation factors provided in the 2020 Developer Fee Justification Study for Los Angeles Unified School District, March 2020.*

The LAUSD student generation rate of 0.360 (students per 1,000 square foot) for "Community Shopping Centers" (Table 15) uses are applied for the retail uses (98,352 x 0.360/1,000 = 35.4), resulting in 35 (rounded) students.

The LAUSD student generation rate of 0.633 (students per 1,000 square foot) for "Corporate Offices" (Table 15) uses is applied for office uses (388,286 x 0.633 /1,000 = 245.7), resulting in 246 (rounded) students.

The LAUSD student generation rate of 0.360 (students per 1,000 square foot) for "Community Shopping Centers" (Table 15) uses are applied for the restaurant uses (12,378 x 0.360/1,000= 4.45), resulting in 5 (rounded) students.

The LAUSD student generation rate of 0.318 (students per 1,000 square foot) for "Industrial Parks" (Table 15) uses is applied for production related uses (109,957 x 0.318/1,000= 34.9, resulting in 35 (rounded) students.

Since the LAUSD School Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the Project residential generation factors (i.e., approximately 56 percent elementary school, 14 percent middle school, and 30 percent high school).

[b] *This is Total Projected Students minus Total Existing Students.*

Source: EcoTierra Consulting, Inc., July 2022.

Pursuant to state law, payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees, would, by law, mitigate the Project's indirect impacts on any schools. In addition, the Project does not include any residential use that would generate a demand for school facilities. **Therefore, impacts would be less than significant and no mitigation measures are required**.

d. Parks?

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on parks shall be made considering the following factors:

- The net population increase resulting from a project;
- The demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and a project's proportional contribution to the demand; and
- Whether a project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

The Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. The Project would consist of the demolition of the existing former Sears building and the construction of a new production studio campus at the Project Site. The Project does not include any residential uses, and although it would generate an increase in on-site employment, any associated increase in demand for park services would be negligible. Although employees may use local parks and off-site open space and recreational facilities on a limited basis during their breaks and lunch hours, they are more likely to utilize such facilities close to their residences. Further, the Project would provide 46,292 square feet of non-required private and common open space for the proposed office and studio tenants. This open space includes private terraces, common terraces, seating areas, and landscaping that would reduce the Project's limited demand for use of existing public recreational and park facilities. **Therefore, impacts would be less than significant and no mitigation measures are required**.

e. Other public facilities?

No Impact. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on libraries shall be made considering the following factors:

(a) The net population increase resulting from the project;

(b) The demand for library services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to existing library services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand; and

(c) Whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct financial support to the Los Angeles Public Library.

The Project would consist of the demolition of the existing former Sears building and the construction of a new production studio campus at the Project Site. The Project does not include any residential uses, and although it would generate an increase in jobs, any associated increase in demand for public facilities would be negligible. The Los Angeles Public Library System (LAPL) provides library services throughout the City, which includes the Central Library, eight regional branch libraries, 72 community branches and online resources. The LAPL has over 7.1 million books, magazines, DVD, CD materials with 100 online databases, 501,847 e-books, e-

audiobooks, e-music and e-videos and three million historic and contemporary images.[195] The Project Site would be served by the John C. Fremont Branch Library. The John C. Fremont Branch Library, which is located at 6121 Melrose Avenue, Los Angeles, is located approximately 1.7 miles southwest of the Project Site. The John C. Fremont Branch Library is 7,361 square feet in size and has a collection size of 36,289 resources.[196]

The Project is not expected to create a substantial demand for library services as no new residential population would be generated. Although employees may use local libraries on a limited basis during their breaks and lunch hours, they are more likely to utilize libraries that are close to their residences. As such, the Project is not expected to create substantial capacity or service problems that would require provision of new or physically altered facilities in order to maintain an acceptable level of service for libraries. **Therefore, no impacts would occur and no mitigation measures would be 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?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

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

Less Than Significant Impact. The Project would consist of the demolition of the existing 98,352-square-foot former Sears building and the construction of a new 510,621-square-foot studio campus building at the Project Site. Although the Project would include an increase of on-site employment, any associated increase in the use of park facilities would be negligible. As stated above, although employees may use local parks and off-site open space and recreational facilities on a limited basis during their breaks and lunch hours, they are more likely to utilize such

195 Los Angeles Public Library website, Facts, https://www.lapl.org/about-lapl/press/library-facts, accessed September 2021.

196 Robyn Myers, Management Analyst, Facilities & Events Management, Los Angeles Public Library, January 20, 2022.

facilities close to their residences. The Project would provide 46,292 square feet of non-required private and common open space for the proposed office and studio tenants. This open space includes private terraces, common terraces, seating areas, and landscaping that would reduce the Project's limited demand for use of existing public recreational and park facilities. **Therefore, impacts would be less than significant and no mitigation measures are required**.

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

No Impact. The Project does not include any residential uses and therefore would not result in any direct substantial population growth that would increase use of existing recreational facilities. Therefore, the Project would not include or necessitate the construction of new or expanded recreational facilities. **Therefore, no impacts would occur and no mitigation measures would be required.**

XVII. TRANSPORTATION

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

The following analysis is primarily based on the Overland Traffic Consultants, Inc., Traffic Assessment for Echelon Studios, APN 5536-012-017, 5601-5673 West Santa Monica Boulevard, 5612-5672 West Virginia Avenue, & 1110-1118 North Wilton Place in the Hollywood Community Plan Area of the City of Los Angeles, August 2022. Refer to Appendix J of this IS/MND. The scope of, and analysis included in the Traffic Assessment was developed in consultation with LADOT as set forth in a Memorandum of Understanding included as Appendix J of the Traffic Assessment.

In November 2018, the California Natural Resources Agency finalized the updates to the state CEQA Guidelines, which became effective on December 28, 2018 and were subsequently adopted by the City on February 28, 2019. Based on these changes, on July 30, 2019, the City adopted the LADOT Transportation Assessment Guidelines (TAG)[197] which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts.

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

Less Than Significant Impact. A significant impact may occur if a project would conflict with a program plan, ordinance, or policy designed to maintain adequate effectiveness of an overall circulation system, including transit, roadway, bicycle, and pedestrian facilities.

The City has adopted programs, plans, ordinances and policies that establish the transportation planning framework for all travel modes. The overall goals of these policies are to achieve a safe, accessible and sustainable transportation system for all users. Mobility Plan 2035 offers a comprehensive vision and set of policies and programs the City aims to achieve to provide streets that are safe and convenient for all users. Vision Zero Los Angeles aims to reduce transportation fatalities to zero by using extensive crash data analysis to identify priority corridors and intersections and applying safety countermeasures. The TAG indicates that these and other relevant City plans and policies, including new and revised plans that may be adopted over time, be consulted in order to identify potential conflicts with projects and plans in the CEQA review process.

The threshold test is to assess whether a project would conflict with an adopted program, policy, plan, or ordinance addressing the circulation system (including transit, roadways, bicycle, and pedestrian facilities) that is adopted to protect the environment. In general, transportation policies or standards adopted to protect the environment are those that support multimodal transportation options and a reduction in VMT. A project that does not implement a particular program, plan, policy, or ordinance would not necessarily result in a conflict or an impact. Many of these programs must be implemented by the City itself over time and over a broad area, and it is the intention of this threshold test to ensure that proposed development projects and plans do not preclude the City from implementing adopted programs, plans, and policies. The Project's consistency with these plans, policies, programs, and ordinances is summarized in Table 4.23, *Consistency Check with Key City Plans, Programs, Ordinances, or Policies.*

197 LADOT Transportation Assessment Guidelines, https://ladot.lacity.org/sites/default/files/documents/2020-transportation-assessment-guidelines_final_2020.07.27.pdf, accessed November 2022.

Table 4.23
Questions to Determine Project Applicability to Plans, Policies, and Programs

#	Guiding Questions	Relevant Plans, Policies, and Programs	Response
1	Does the Project include additions or a new construction along a street designated as a Boulevard I, and II, and/or Avenue I, II, or III on property zoned R3 or less restrictive zone?	LAMC Sec. 12.37 Highway and Collector Street Dedication and Improvement	**No**. The Project Site is to be developed along West Santa Monica Boulevard, a Modified Avenue II roadway, but the site is not zoned R3 or a less restrictive zone. As such, no further analysis is required.
2	Is the Project Site along any network identified in the City's Mobility Plan?	Mobility Plan Policy 2.3 Pedestrian Infrastructure (Map F)	**Yes**. North Wilton Place and West Santa Monica Boulevard, along the Project Site frontages, are part of the PED Network. The Project has been designed to improve the landscaping and repair the pedestrian sidewalk providing a safe walkable sidewalk on this portion of the roadway. As such, an analysis of the Project's consistency with Mobility Plan 2.3 Pedestrian Infrastructure is included below.
		Mobility Plan Policy 2.4 Neighborhood Enhanced Network (Map C4)	**No.** No Project Street frontages are part of the NEN. Further, the Project is not proposing any changes along any streets that would prevent the City from installing additional features as part of the NEN, nor does the Project propose to modify any streets that would increase travel speeds on the neighborhood network. As such, no further analysis is required.
		Mobility Plan Policy 2.5 Transit Network (Map B)	**Yes.** West Santa Monica Boulevard is a designated TEN roadway. The Project does not propose to permanently remove or modify transit facilities in a manner that would negatively impact the reliability of existing transit service. However, as the Site is located on a TEN roadway, an analysis of the Project's consistency with Mobility Plan 2.5 Transit Network is included below.
		Mobility Plan Policy 2.6 Bicycle Network (Map D2)	**Yes.** Santa Monica is a Tier 3 BEN and North Wilton Place is a Tier 2 BEN**.** As such, an analysis of the Project's consistency with Mobility Plan 2.6 Bicycle Network is included below.
		Mobility Plan Policy 2.7 Vehicle Network (Map E)	**No**. The Project Site Street frontages are not part of the VEN. As such, no further analysis is required.

Table 4.23
Questions to Determine Project Applicability to Plans, Policies, and Programs

#	Guiding Questions	Relevant Plans, Policies, and Programs	Response
3	Are dedications or improvements needed to serve long-term mobility needs identified in the Mobility Plan 2035?	Mobility Plan – Street Classifications; Street Designations and Standard Roadway Dimensions, and Mobility Plan Policy 2.17: Street Widenings	**Yes**. According to the BOE PCRF & Mobility Element street dedication and improvements are shown below. • Santa Monica – 12' dedication & 7' widening • Wilton Pl. – 8' dedication & 5' widening • Alley 4' dedication • Corner cut or 20'radius Santa Monica/Virginia, Santa Monica/St. Andrews, Wilton Pl/Virginia Av, & Wilton Pl/St Andrews. A WDI will be requested.
4	Does the Project require placement of transit furniture in accordance with the City's Coordinated Street Furniture and Bus Bench Program?	N/A	**No**. The nearest bus stop is located adjacent to the Project Site on West Santa Monica Boulevard. The bus stop for Metro Route 4 already has transit furniture in place. As such, no further analysis is required.
5	Is the Project Site in an Identified Transit Oriented Community?	Mobility Plan Transit Enhanced Network, Mobility Plan Pedestrian Enhanced Districts, Mobility Plan Bicycle Enhanced Network, and Transit Oriented Communities (TOC) Guidelines	**Yes**. The Project Site is located within a Tier 3 Transit Oriented Community. As such, an analysis of the Project's consistency with the Mobility Plan's TEN, PED, BEN and TOC Guidelines is provided below.
6	Is the Project Site on a roadway identified in the City's High Injury Network?	Vision Zero Action Plan Mobility Plan 2035	**Yes**. West Santa Monica Boulevard and North Wilton Place are identified in the City's High Injury Network in the City's Vision Zero Action Plan. As such, an analysis of the Project's consistency City designated High Injury Network is provided below.
7	Does the Project propose repurposing existing curb space? (Bike corral, car-sharing, parklet, electric vehicle charging, loading zone, curb extension, etc.)	Mobility Plan Policy 2.1: Adaptive Reuse of Streets; Mobility Plan Policy 2.3: Pedestrian Infrastructure; Mobility Plan Policy 2.4: Neighborhood Enhanced Network; Mobility Plan Policy 2.10: Loading Areas; Mobility Plan Policy 3.2 People with Disabilities; Mobility Plan; Mobility Plan Policy 3.5 Multi-Modal Features;	**No**. The Project does not propose repurposing existing curb space. As such, no further analysis is of this issue is required.

Table 4.23
Questions to Determine Project Applicability to Plans, Policies, and Programs

#	Guiding Questions	Relevant Plans, Policies, and Programs	Response
		Mobility Plan Policy 3.8 Bicycle Parking; Policy 4.1 New Technologies; Mobility Plan Policy 4.13 Parking and Land Use Management; Mobility Plan Policy 5.1 Substantial Transportation; Mobility Plan Policy 5.4 Clean Fuels and Vehicles; and Mobility Plan Policy 5.5 Green Streets.	
8	Does the Project propose narrowing or shifting existing parkway?	Mobility Plan Policy 5.5: Green Streets, Sustainability pLAn	**No**. The Project would not narrow or shift existing parkway. As such, no further analysis of this issue is required.
9	Does the Project propose modifying, removing, or otherwise affect existing bicycle infrastructure (ex: driveway proposed along street with bicycle facility)	Mobility Plan – Bicycle Enhanced Network Policy 4.15, public hearing process Vision Zero	**No**. The Project would front West Santa Monica Boulevard, which is designated as a Tier 3 Bicycle Lane in the Mobility Plan's Bicycle Lane Network map. Vehicular access to the Project Site would be provided via two-way entry/exit driveways on North Wilton Place and Saint Andrews Place, and two studio vehicle and loading entry driveways that would lead into a flexible studio vehicle parking and loading area recessed within the building footprint would be provided on West Virginia Avenue. Therefore, the Project would not modify, remove or otherwise affect existing bicycle infrastructure on West Santa Monica Boulevard. As such, no further analysis of this issue is required.
10	Is the Project Site adjacent to an alley? If yes, will the Project make use of, modify, or restrict alley access?	Mobility Plan Policy 3.9: Increased Network Access; Mobility Plan Programs ENG.9, PL.1, PL.13, and PS.3	**No**. The Project Site contains two existing alleys that will both be vacated with the development of the Project. There are no alleys located adjacent to the Site. As such, no further analysis of this issue is required.
11	Does the Project create a cul-de-sac or is the Project Site adjacent to an existing cul-de-sac? If yes, is the cul-de-sac consistent with design goal in Mobility Plan 2035 (maintain through bicycle and pedestrian access)?	Mobility Plan Policy 3.10 Cul-de-sacs	**No**. The Project would not create a cul-de-sac and would not be adjacent to an existing cul-de-sac. As such, no further analysis of this issue is required.

Table 4.23
Questions to Determine Project Applicability to Plans, Policies, and Programs

#	Guiding Questions	Relevant Plans, Policies, and Programs	Response
Access: Driveways and Loading			
12	Does the Project Site introduce a new driveway or loading access along an arterial (Avenue or Boulevard)?	Mobility Plan Programs PL.1; PK.10; Citywide Design Guideline Policy 4.1.02	**Yes**. The Project would introduce a new driveway off of North Wilton Place, a modified Avenue III roadway, as well as new driveways off Saint Andrews Place and West Virginia Avenue, both of which are local streets. As such, an analysis of the Project's consistency with Mobility Plan Programs PL.1; PK.10, and Citywide Design Guidelines Policy 4.1.02 is provided below.
13	If yes to 12, Is a non-arterial frontage or alley access available to serve the driveway or loading access needs?	Mobility Plan Program PL.1; Manual of Policies and Procedures Section 321: Driveway Design	**Yes**. Driveways will also be provided off Saint Andrews Place and West Virginia Avenue (both local streets) along with those on North Wilton Place. The Project is consistent with MP-PL.1 & MPP 321.
14	Does the Project Site include a corner lot? (avoid driveways too close to intersections)	Citywide Design Guidelines Policy 4.1.01	**Yes**. The Project Site encompasses the entire block between West Santa Monica Boulevard and West Virginia Avenue and North Wilton Place and Saint Andrews Place. Therefore, the Site is located on the northeast corner of the intersection of North Wilton Place and West Santa Monica Boulevard and the northwest corner of the intersection of North Saint Andrews Place and West Santa Monica Boulevard, as well as the southeast corner of the intersection of North Wilton Place and West Virginia Avenue and the southwest corner of the intersection of North Saint Andrews Place and West Virginia Avenue. As such, an analysis of the Project's consistency with Citywide Design Guidelines Policy 4.1.01 is provided below.
15	Does the Project propose driveway width in excess of City standard?	Manual of Policies and Procedures Section 321: Driveway Design; Vision Zero; Sustainability Plan; Mobility Plan Pedestrian Enhanced Districts, Mobility Plan Bicycle Enhanced Network; Citywide Design Guidelines Policy 4.1.01	**No**. The Project's proposed driveways would conform to the City's width standards. As such, no further analysis is required.
16	Does the Project propose more driveways than required by City maximum standard?	Manual of Policies and Procedures – Section 321: Driveway Design; Vision Zero; Healthy LA	**No**. Vehicular access to the Project Site would be provided via two-way entry/exit driveways on North Wilton Place and Saint Andrews Place, and two studio vehicle and loading entry/exit driveways that lead to a flexible studio vehicle parking and loading area recessed within the building footprint would be

Table 4.23
Questions to Determine Project Applicability to Plans, Policies, and Programs

#	Guiding Questions	Relevant Plans, Policies, and Programs	Response
			provided on West Virginia Avenue. Currently there are five accesses to the Site. In the future, with the Project, there would be six. As such, no further analysis is required.
17	Are loading zones proposed as part of the Project?	Mobility Plan Policy 2.10 Loading Areas; Mobility Plan Programs PK.1; PK.7; PK.8; and Manual of Policies and Procedures - Section 321: Driveway Design	**Yes**. The Project would include on-site loading zones. As such, an analysis of the Project's consistency with Mobility Plan 2.10 Loading Areas; Mobility Plan Programs PK.1; PK.7; PK.8; and Manual of Policies and Procedures - Section 321: Driveway Design is included below.
18	Does the Project include "drop-off" zones or areas? If yes, are such areas located to the side or rear of the building?	Mobility Plan Policy 2.10 Loading Area	**Yes**. On-site drop-off zones would be accessed from driveways on North Wilton Place and Saint Andrews Place. As such, an analysis of the Project's consistency with Mobility Plan Policy 2.10 Loading Area is included below.
19	Does the Project propose modifying, limiting/restricting, or removing public access to a public right-of-way (e.g., vacating public right-of-way)?	Mobility Plan Policy 2.3: Pedestrian Infrastructure; Mobility Plan Policy 3.9: Increased Network Access	**Yes**. The Project would include vacating two alley ways. As such, an analysis of the Project's consistency with Mobility Plan Policies 2.3 Pedestrian Infrastructure and Mobility Plan Policy 3.9 Increased Network Access, is included below.

Based on the screening questions above, the following plans, policies, and programs apply to the Project:

- Mobility Plan 2035
  - Policies 2.3, 2.5, 2.6, 2.10, 2.17, and 3.9;
  - Programs PK.1, PK.7, PK.8, and PLK.10;
  - Street Classifications; Street Designations and Standard Roadway Dimensions;
  - Transit Enhanced Network;
  - Bicycle Enhanced Network;
  - Pedestrian Enhanced Districts;
- Transit Oriented Communities (TOC) Guidelines;
- Citywide Design Guideline Policy 4.1.01 and 4.1.02; and
- Manual of Policies and Procedures - Section 321: Driveway Design

Mobility Plan 2035

As discussed in the regulatory setting above, the Transportation Element of the City's General Plan, the "Mobility Plan 2035," offers a comprehensive vision and set of policies and programs

the City aims to achieve to provide streets that are safe and convenient for all users. As shown by the analysis below, the Project would not impede or impair the City's ability to implement the five broad goals of the Mobility Plan 2035 relating to: (1) public safety, (2) infrastructure networks, (3) providing accessibility for all Angelenos, (4) ensuring departmental and agency cooperation, and (5) providing for a clean environment. Based on the initial screening responses in Table 4.23, above, a discussion of the Project's consistency with the applicable Mobility Plan Policies and Programs is provided below.

Policies 2.3, 2.5, 2.6, 2.10, 2.17, and 3.9

Policy 2.3 Pedestrian Infrastructure – Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment: The Project would construct a studio development that includes pedestrian facilities and would include private and common open space for the Project's office and studio tenants. Pedestrian access to the Project's various components would be provided from North Saint Andrews Place, West Santa Monica Boulevard, and North Wilton Place. The ground-floor commercial uses would consist of several establishments, each with its own entrance directly from West Santa Monica Boulevard. Pedestrian access to the studio component would also be accessible from two lobby areas (one fronting North Saint Andrews Place and the other fronting North Wilton Place). The Project does not propose repurposing existing curb space and does not propose narrowing or shifting existing sidewalk placement or paving, narrowing, shifting, or removing an existing parkway. The Project is also proposing pedestrian improvements, such as landscaping, along the Project Site's frontage on West Santa Monica Boulevard to meet the long-term mobility needs identified in the Mobility Plan. Therefore, the Project would not redesign the street or sidewalk in a way that would limit any future demands. The Project would not conflict with Policy 2.3.

Policy 2.5 Transit Enhanced Network (TEN)—Improve the performance and reliability of existing and future bus service: - The TEN is comprised of streets that prioritize travel for transit riders. West Santa Monica Boulevard, which forms the south side of the Project Site, is designated as a Comprehensive Transit Enhanced street and Western Avenue, which is located east of the Project Site, is designated as a Moderate Plus Transit Enhanced street. The Project does not propose to permanently remove or modify transit facilities in a manner that would negatively impact the reliability of existing transit service. The Project's redevelopment of the Project Site with a studio and creative office campus would intensify it use which, in turn, would encourage greater transit usage. Therefore, the Project would support implementation and would not preclude the future transit enhancements and not conflict with Policy 2.5.

Policy 2.6 Bicycle Networks—Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities: While this is a citywide policy, the Project would support its implementation. West Santa Monica Boulevard, which forms the south side of the Project Site, is designated as a Tier 3 BEN and North Wilton Place, which forms the west side of the Project Site, is designated as a Tier 2 BEN. The Project does not propose modifying, removing, or otherwise affecting existing bicycle infrastructure, and Project development would not preclude development of bike lanes along West Santa Monica Boulevard

or North Wilton Place. Therefore, the Project would not conflict with the bicycle lane network in the Mobility Plan 2035.

Policy 2.10 Loading Areas—Facilitate the provision of adequate on and off-street loading areas: Vehicular access to the Project Site would be provided via two-way entry/exit driveways on North Wilton Place and Saint Andrews Place. The driveways would allow access to both self-parking and valet within the subterranean parking garage. The Project would also include two at-grade on-site drop-off areas to serve both rideshare arrivals/departures located on North Wilton Place and Saint Andrews Place. Two studio vehicle and loading entry driveways that would lead to a flexible studio vehicle parking and loading area recessed within the building footprint would be provided on West Virginia Avenue. Therefore, all proposed rideshare drop-off/loading zones would be provided on-site. The delivery and loading zones would be located along West Virginia Avenue, would be separate from other circulation areas and would be managed to facilitate safe loading operations and to limit vehicle queue spillovers into the travel lanes. Therefore, the Project would comply with Policy 2.10.

Policy 2.17 Street Widenings—Carefully consider the overall implications (cost, character, safety, travel, infrastructure, environment) of widening a street before requiring the widening, even when the existing right of way does not include a curb and gutter or the resulting roadway would be less than the standard dimension: According to the Bureau of Engineering (BOE)/Department of City Planning (DCP) Planning Case Referral Form (PCRF) and Mobility Element, West Santa Monica Boulevard, which is designated in the Mobility Plan 2035 as a Modified Avenue I (requiring a 104-foot right-of-way and 74-foot roadway), would require a 12-foot dedication and 7-foot widening. North Wilton Place, which is designated in the Mobility Plan 2035 as a Modified Avenue III (requiring a 76-foot right-of-way and 50-foot roadway), would require an 8-foot dedication and 5-foot widening. A 15-foot by 15-foot corner cut or 20-foot radius would be required on the corners of Santa Monica Boulevard/Virginia Avenue, Santa Monica Boulevard/Saint Andrews Place, North Wilton Place/Virginia Avenue, and Saint Andrews Place/Virginia Avenue. In addition, the east-west alley intersecting North Wilton place and the north-south alley intersecting West Virginia Avenue between the east and west boundaries of the Project Site require a 20-foot dedication and improvement.

However, the dedications and widening are not currently necessary to meet the City's mobility needs and would disrupt street frontages and potentially create hazardous situations. The Project requests to maintain the current dedications and roadways to provide a cohesive pedestrian experience. The BOE PCRF-required widening and dedications are unlikely to occur on neighboring properties; therefore, if the Project were to provide such widening and dedications, discontinuous improvements would be created along the affected streets which could create potentially hazardous conditions. Discontinuous improvements do not yield practical benefits to the City's mobility needs and may hinder movement when street frontages are not uniform. The Project proposes to redevelop the entire City block and would merge the alleys into the Project Site, so that the Project can be developed on a unified campus setting. Consequently, a waiver under LAMC 12.37 from noted dedication and improvements is being requested. Therefore, the Project would comply with Policy 2.17.

Policy 3.9 Increased Network Access—Discourage the vacation of public rights-of-way: The Project will be vacating two alley ways. The east-west alley intersecting North Wilton Place and north-south alley intersecting West Virginia Avenue between the east and west boundaries of the Project Site require a 20-foot dedication and improvement. The Project requests to maintain the current dedications to provide a cohesive pedestrian experience. The BOE PCRF-required dedications are unlikely to occur on neighboring properties. Discontinuous improvements do not yield practical benefits to the City's mobility needs. The Project proposes to redevelop the entire City block and is applying to merge the alleys into the Project Site, so that the Project can be developed on a unified campus setting. A waiver under LAMC 12.37 from noted dedication and improvements is being requested. Therefore, the Project would comply with Policy 3.9.

Programs PK.1, PK.7, PK.8, and PLK.10

PK.1 Creative Parking Solutions. Work with communities, businesses, and organizations to identify and implement creative strategies to resolve parking conflicts in areas with high-parking demand: The Project is required to provide a total of 981 vehicular parking spaces and would provide 981 vehicular parking spaces, located and configured in compliance with applicable requirements of the LAMC. The on-site drop-off areas on the ground floor would encourage ridesharing and carpooling, while the on-site parking would include preferential parking for electric and low-emitting vehicles. The Project would also meet or exceed code required electric vehicle charging stations. The Project would also provide long- and short-term bicycle parking spaces in accordance with the City Bicycle Ordinance, which would encourage bicycling to work and other destinations. The Project Site is also in a Transit Priority Area and is within walking distance of several rapid Metro bus lines along West Santa Monica Boulevard and Western Avenue and the Metro Hollywood/Western B Line transit station. The transit opportunities would provide future Project employees and visitors with reliable and safe transportation. Therefore, Project would not conflict with Program PK.1.

PK.7 Off-Street Loading. In non-industrial areas, require off-street dock and/or loading facilities for all new non-residential buildings and for existing non- residential buildings and undergoing extensive renovations and/or expansion, whenever practical: Two studio vehicle and loading entry driveways that lead into a flexible studio vehicle parking and loading area recessed within the building footprint would be provided on West Virginia Avenue. Therefore, Project would not conflict with Program PK.7.

PK.8 On-Street Loading. Encourage the designation of on-street loading areas, through removal of curb parking, in established industrial areas where off-street loading facilities are lacking. Update the Commercial Loading Zone Ordinance (see B-2, page 6, 2-14 of Mayor's Task Force-Mar 2004): Not applicable.

PK.10 Pedestrian Improvement Incentives. Establish an incentive program to encourage projects to retrofit parking lots, structures and driveways to include pedestrian design features: This a citywide program and the Project would not conflict with the implementation of Program PK.10.

Street Classifications; Street Designations and Standard Roadway Dimensions

As previously discussed, West Santa Monica Boulevard is a Modified Avenue I (requiring a 104-foot right-of-way and 74-foot roadway) that would require a 12-foot dedication and 7-foot widening. North Wilton Place is designated as a Modified Avenue III (requiring a 76-foot right-of-way and 50-foot roadway) that would require an 8-foot dedication and 5-foot widening. A 15-foot by 15-foot corner cut or 20-foot radius cut would be required on the corners of Santa Monica Boulevard/Virginia Avenue, Santa Monica Boulevard/Saint Andrews Place, North Wilton Place/Virginia Avenue, and Saint Andrews Place/Virginia Avenue. In addition, the east-west alley intersecting North Wilton Place and north-south alley intersecting West Virginia Avenue between the east and west boundaries of the Project Site require a 20-foot dedication and improvement.

The Project requests to maintain the current dedications and roadways to provide a cohesive pedestrian experience. As discussed above, discontinuous improvements do not yield practical benefits to the City's mobility needs and may hinder movement when street frontages are not uniform. The Project has been designed to redevelop the entire City block and would merge the alleys into the Project Site, so that the Project would development the Project Site as a unified campus setting.

Transit Enhanced Network

The TEN is comprised of streets that prioritize travel for transit riders. West Santa Monica Boulevard, which forms the south side of the Project Site, is designated as a Comprehensive Transit Enhanced street and Western Avenue, which is located east of the site, is designated as a Moderate Plus Transit Enhanced street. The Project does not propose to permanently remove or modify transit facilities in a manner that would negatively impact the reliability of existing transit service. The Project's redevelopment of the Project Site with a studio and creative office campus would intensify the overall use which, in turn, would encourage greater transit usage. Therefore, the Project would support implementation and would not preclude the future transit enhancements.

Bicycle Enhanced Network

The BEN is comprised of a network of low – stressed protected bike lanes and bike paths prioritize bicycle travel by providing specific bicycle facilities and improvements. West Santa Monica Boulevard, which forms the south side of the Project Site, is designated as a Tier 3 BEN and North Wilton Place, which forms the west side of the Project Site, is designated as a Tier 2 BEN. The Project does not propose modifying, removing, or otherwise affecting existing bicycle infrastructure, and Project development would not preclude development of bike lanes along West Santa Monica Boulevard or North Wilton Place. Therefore, the Project would not conflict with existing or proposed bicycle lane network improvements in the Mobility Plan 2035.

Pedestrian Enhanced Network

Many arterial streets that could benefit from additional pedestrian features to provide better walking connections are identified as PED. The PED segments provided in the mobility map identify streets where pedestrian improvements on arterial streets could be prioritized to provide

better walking connections to and from the major destinations within communities. West Santa Monica Boulevard, east of North Ridgewood Place and along the Project frontage and North Wilton Place, between West Virginia Avenue and Sierra Vista Avenue, are both identified as part of the PED. Western Avenue, located east of the Site, is also identified as part of the PED.

Transit Oriented Communities (TOC) Guidelines

These Guidelines are intended to provide eligibility standards, incentives, and other necessary components for TOC Affordable Housing Incentive Areas.[198] The Project does not include or propose affordable housing; therefore, these Guidelines are not applicable.

Citywide Design Guideline 2 (Carefully incorporate vehicular access such that it does not discourage and/or inhibit the pedestrian experience)

As described above, pedestrian access to the Project's various components would be provided at North Saint Andrews Place, West Santa Monica Boulevard, and North Wilton Place and building entrances and the studio vehicle parking surface parking area would be oriented along these streets. Vehicular and bicycle access to the Project Site would be provided via two-way entry/exit driveways on North Wilton Place and North Saint Andrews Place. These driveways would allow access to both self-parking and valet within the subterranean parking garage. The Project would also include two at-grade on-site drop-off areas to serve both rideshare arrivals/departures located on North Wilton Place and North Saint Andrews Place. Two studio vehicle and loading entry driveways that would lead to a flexible studio vehicle parking and loading area recessed within the building footprint would be provided on West Virginia Avenue. These driveways would not be oriented near the pedestrian access points. Pedestrian entrances would be located separately from vehicular driveways, thereby creating a separation between these areas and the pedestrian building entrances. Overall, vehicular access to the Project Site has been designed to not discourage pedestrian access.

Manual of Policies and Procedures – Section 321: Driveway Design

The impact on streets is influenced by the design and use of off-street parking and loading facilities to accept and discharge vehicles. Section 321: Driveway Design, outlines the goal of good driveway design in order to minimize adverse effects on street traffic. As described above, vehicular access to the Project Site would be provided via two-way entry/exit driveways on North Wilton Place and North Saint Andrews Place, located midblock. The Project would also include two at-grade on-site drop-off areas to serve both rideshare arrivals/departures located on North Wilton Place and North Saint Andrews Place, also located midblock. Two studio vehicle and loading entry driveways that lead to a flexible studio vehicle parking and loading area recessed within the building footprint would be provided on West Virginia Avenue, setback from street intersections. The proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements, which have been outlined in Section 321: Driveway Design, regarding site access.

198 City of Los Angeles, Department of City Planning, Transit Oriented Communities Guidelines, https://planning.lacity.org/ordinances/docs/toc/TOCGuidelines.pdf, accessed November 2022.

Other Programs, Plan, Ordinances, and Policies

Several other programs, plans, ordinances, and policies that were previously mentioned in the regulatory setting and are applicable to the Project are discussed in more detail in Section XI, Land Use and Planning, of this IS/MND. More specifically, the 2020-2045 RTP/SCS, the City of Los Angeles General Plan Framework, and the Citywide Design Guidelines all contain goals and policies applicable to transportation and, in some cases, land use projects. For the reasons explained in Section XI, Land Use and Planning, of this IS/MND, the Project would not conflict with those programs, plans, ordinances, and policies.

Therefore, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, impacts would be less than significant and no mitigation measures are required.

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. A significant impact may occur if a project's vehicle miles traveled substantially increase compared to existing counts.

LADOT's TAG establishes analysis methods and impact significance criteria to apply in the analysis of VMT effects associated with new land use projects. Specifically, Threshold T-2.1 asks whether the project would conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)(1). CEQA Guidelines Section 15064.3(b) relates to use of VMT as the methodology for analyzing transportation impacts. To address this question, LADOT's TAG established potential impact criteria for residential, office, regional-serving, and other land use development projects and identified significant VMT impact thresholds for each of seven Area Planning Commission (APC) sub-areas in the City. A project's VMT is compared against its APC threshold goal for household VMT per capita and work VMT per employee to evaluate the significance of the project's VMT.

As shown in Appendix D to the Traffic Assessment, attached as Appendix J to this IS/MND, the Project was evaluated against the initial screening criteria to determine if a full VMT analysis was required. Using the VMT calculator for screening purposes, the Project would generate 3,938 vehicle trips without any TDM strategies. Based on the responses to the Screening Criteria, the Project required a full VMT analysis. Appendix D of the Traffic Assessment (Appendix J to this IS/MND) contains the VMT worksheets.

The Project is located in the Central APC area, where the daily work VMT per employee threshold is 7.6 (15 percent below the existing VMT for the Central APC).

As a Project Design Feature incorporated into the Project (**PDF TR-1**), the Project would incorporate permissible reductions to the vehicle parking supply below what is required per LAMC, provide a sufficient number of bicycle parking spaces to meet City of Los Angeles bicycle parking requirements per LAMC Section 12.21.A.16 by providing 56 short term bicycle parking spaces, 106 long term bicycles spaces, and 10 showers and a total of 162 secure lockers.

The results of the Project's VMT calculation (as shown in Appendix D of the Traffic Assessment found in Appendix J to this IS/MND) shows that the Project's work VMT per employee is estimated as 6.6, which is substantially below the applicable threshold of 7.6. Based on the above VMT analysis, the Project would not conflict or be inconsistent with state CEQA Guidelines Section 15064.3, subdivision (b). **Therefore, impacts would be less than significant and no mitigation measures are required.**

Project Design Features

Construction and operation of the Project would be implemented in accordance with applicable regulatory and code requirements related to transportation. Additionally, the Project has incorporated the following PDF to avoid or minimize adverse operation related impacts. The PDF is therefore considered to be part of the Project for purposes of the impact analysis:

PDF TR-1: **Transportation Demand Management Program**. A preliminary TDM program shall be prepared and provided for DOT review prior to the issuance of the first building permit for this project and a final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the Project. The TDM program shall include, but shall not be limited to, the following strategies:

- Reduced Parking Supply – This strategy changes the Project's parking supply to provide less than the amount of vehicle parking required by direct application of the LAMC requirements without consideration of parking reduction permitted in the code. Per direct application of the LAMC for the Project would be required to provide 1,012 parking spaces. The Project will apply reductions through replacement of each vehicle space with 4 bicycle spaces for a total of 981 vehicle parking spaces.

- Bicycle Infrastructure – Include Bike Parking per LAMC - This strategy involves implementation of short and long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations under existing LAMC regulations applicable to the Project. The Project is required to, and will provide, a minimum of 162 bicycle parking spaces.

- Bicycle Infrastructure – Include Bike Parking and Showers - This strategy involves implementation of additional end of trip bicycle facilities to support safe and comfortable bicycle travel by providing amenities at the Project. This Project will provide up to 10 showers and 162 secure lockers.

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

No Impact. Impacts regarding the potential increase of hazards due to a geometric design feature generally relate to the design of access points to and from the Project Site, and may include safety, operational, or capacity impacts. Impacts can be related to vehicle conflicts as well as to operational delays caused by vehicles slowing and/or queuing to access a Project Site.

For the reasons explained below, there are no deficiencies in the Project Site access plans which would be considered significant. This determination considers the following factors:

1. No vehicular access is proposed on West Santa Monica Boulevard, a designated Modified Avenue I roadway.

2. Vehicle access to the Project's parking would be from the adjacent Local Streets of West Virginia Avenue and Saint Andrews Place and from the Modified Avenue III roadway of North Wilton Place.

3. The Project would reduce the number of driveways accessing higher designated, and more heavily used, roadway, of North Wilton Place. By providing one fewer access point on the more trafficked roadway, the Project would reduce the number of potential hazard points adversely affecting pedestrians, cyclists, and other vehicles.

4. Due to the Avenue III roadway designation; mirrors, visual and audio alerts of existing vehicles is proposed along North Wilton Place.

5. The Project's proposed street access would be consistent with LADOT driveway placement and location per LADOT Manual of Policies and Procedures Section 321, Driveway Design.[199]

A review of the Project Site plans does not present any hazardous geometric design features. **Therefore, no impacts would occur and no mitigation measures are required.**

d. Result in inadequate emergency access?

Less Than Significant Impact. A significant impact may occur if a project design does not provide emergency access meeting the requirements of the Fire Department or in any other way threatens the ability of emergency vehicles to access and serve the project site or adjacent uses.

Construction

Construction activities can have the potential to affect emergency access, by adding construction traffic to the street network and requiring partial lane closures during street improvements and utility installations. The Project's potential construction impacts related to emergency access are considered to be less than significant for the following reasons:

- Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAFD.

- Construction impacts are temporary in nature and do not cause lasting effects to impact LAFD fire protection services.

199 LADOT, Los Angeles Department of Transportation Manual of Policies and Procedures, Section 321, https://silo.tips/download/manual-of-policies-and-procedures-this-section-provides-the-basic-criteria-for-r, accessed November 2022.

- Partial lane closures, if determined to be necessary, would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until the street closure had ended.

- The Project would prepare a Construction Staging and Traffic Management Plan (see **PDF TR-2**) that would specifically address traffic and access control during construction.

Accordingly, Project construction would not adversely affect emergency access. **Therefore, impacts would be less than significant and no mitigation measures are required**.

Operation

There are no hazardous design features included in the proposed vehicular design or site plan for the Project that could impede emergency access.

The Project does not propose the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from Santa Monica Boulevard. Furthermore, the Project would be subject to the plan review requirements of the LAFD pursuant to Section 118 of the Fire Code to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles. All Project driveways would be designed according to LADOT standards to ensure adequate access, including emergency access, to the Project Site. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the Project. **Therefore, impacts would be less than significant and no mitigation measures are required**.

Project Design Features

Construction and operation of the Project would be implemented in accordance with applicable regulatory and code requirements related to transportation. Additionally, the Project has incorporated the following Project Design Feature (PDF) to avoid or minimize adverse construction related impacts. The PDF is therefore considered to be part of the Project for purposes of the impact analysis:

TR PDF-2: Prior to the issuance of a building permit for the Project, a detailed Construction Staging and Traffic Management Plan (CSTMP) would be submitted to LADOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work. The plan would show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. The CSTMP would formalize how construction would be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CSTMP will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site.

Construction management meetings with City Staff and other surrounding construction Related Project representatives (i.e., construction contractors) whose projects will potentially be under construction at around the same time as the Project shall be conducted bimonthly, or as otherwise determined appropriate by City Staff. This coordination will ensure construction activities of the concurrent Related Projects and associated hauling activities are managed in collaboration with one another and the Project. LADOT also recommends that all construction related truck traffic be restricted to off-peak hours. The CSTMP would include, but not be limited to, the following elements as appropriate:

- Emergency access shall be maintained to the Project Site during construction through marked emergency access points approved by the Los Angeles Fire Department (LAFD).
- Construction worker parking on nearby residential streets shall be prohibited.
- Worker parking shall be provided on-site or in designated off-site public parking areas.
- Temporary traffic control during all construction activities adjacent to public rights-of-way shall be provided to improve traffic flow on public roadways (e.g., flag men).
- Construction-related deliveries, haul trips, etc., shall be scheduled so as to occur outside the commuter peak hours to the extent feasible, to reduce the effect on traffic flow on surrounding streets.
- Construction-related vehicles shall be prohibited from parking on surrounding public streets.
- Safety precautions for pedestrians and bicyclists shall be obtained through such measures as alternate routing and protection barriers as appropriate, especially as it pertains to maintaining safe routes to schools, particularly Metropolitan High School.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.
- In the event of a lane or sidewalk closure, traffic and/or pedestrians shall be routed around any such lane or sidewalk closures.

- The locations of the off-site truck staging shall be identified to include, staging in a legal area, and which would detail measures to ensure that trucks use the specified haul route, and do not travel through nearby residential neighborhoods.
- There would be coordination with nearby projects, that have potential overlapping construction timeframes, to schedule vehicle movements to ensure that there are no vehicles waiting off-site and impeding public traffic flow on the surrounding streets.

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	☐	☒	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

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

Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

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

Less Than Significant Impact With Mitigation Incorporation. Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074, as part of the CEQA review process. As specified in AB 52, lead agencies must provide notice inviting consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of proposed projects in that area. The Tribe must respond in writing within 30 days of the City's AB 52 notice. The Native America Heritage Commission (NAHC) provided a list of Native American groups and individuals who might have knowledge of the religious and/or cultural significance of resources that may be in and near the Project Site. An informational letter was mailed on December 12, 2021 to various tribes. The City received correspondence and request for consultation from one tribe, the Gabrieleno Band of Mission Indians - Kizh Nation on 14 December 2021. Consultation was held on 10 February 2022. A follow up meeting was held on 19 May 2022. Materials were sent from the Tribe after both meetings (Appendix K). A Sacred Lands File (SLF) Search was performed on October 4, 2021 which indicated negative results.[200] A records search prepared by the South Central Coastal Information Center (SCCIC) did not disclose any prior evaluations of the Project Site.[201] The SCCIC records search revealed that there have been no recorded archaeological resources within the Project Site, or within one within a half-mile radius of the Project Site. In addition, the SCCIC records search revealed there are no built-environment resources within the Project Site but there are 22 built-environment resources within a half-mile radius of the Project Site (see Appendix D).[202] The SCCIC records search also revealed that, in 1902, there was no visible development within the Project Site. The Hollywood and Cahuenga Valley Railroad ran east of the Project Site. There were several roads, several buildings, and one intermittent stream within the Project radius. In 1921, there were several buildings within the Project Site. There was a significant increase in development which includes several buildings and a grid-like system of

200 Correspondence from Andrew Green, Cultural Resources Analyst, Native American Heritage Commission, October 4, 2021.

201 South Central Coastal Information Center, Records Search, January 25, 2022.

202 A Built Environment Resource are resources that embody the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values. Office of Historic Preservation, Built Environmental Resource Directory, https://ohp.parks.ca.gov/?page_id=30338, accessed October 18, 2022.

roads. Also of note was an unnamed cemetery located in the south west portion of the half-mile radius. The previously mentioned railroad and stream no longer appear on the map. Historic Route 66 is recorded on West Santa Monica Boulevard adjacent to the Project Site.

Based on the depth of excavation of the Project to 30 to 40 feet, there is the possibility that tribal cultural resources may be encountered during the development of the Project and therefore that impacts to tribal cultural resources may be significant. **However, the Project's incorporation of mitigation measure MM TCR-1, which the Applicant has previously agreed to do, would ensure that any potential tribal cultural resources encountered during the development of the Project are handled appropriately, which would reduce any such potential impacts to a less than significant level. Therefore, such impacts would be less than significant with mitigation incorporated.**

Mitigation Measure:

MM TRC-1: In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall assess the find. Work on the portions of the Project outside of the buffered area may continue during this assessment period. The Fernandeño Tataviam Band of Mission Indians (FTBMI) shall be contacted regarding any pre-contact and/or post-contact finds and be provided information after the archaeologist makes their initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant in accordance with applicable law, the Project applicant shall retain a professional Native American monitor procured by the FTBMI to observe all remaining ground-disturbing activities including, but not limited to, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, clearing, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work. The Lead Agency and/or applicant shall, in good faith, consult with the FTBMI on the disposition and treatment of any Tribal Cultural Resource encountered during all ground disturbing activities pursuant to the process set forth below.

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed Project, and (2) Department of City Planning, Office of Historic Resources (OHR).

2. If OHR determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future ground

disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

3. The Applicant, or its successor, shall implement the tribe's recommendations if a qualified archaeologist retained by the City and paid for by the Applicant, or its successor, in consultation with the tribal monitor, reasonably conclude that the tribe's recommendations are reasonable and feasible.

4. In addition to any recommendations from the applicable tribe(s), a qualified archeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.

5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or qualified tribal monitor, the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the archaeologist or tribal monitor; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate an significant impacts to tribal cultural resources. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.

6. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.

7. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in Items 2 through 5 above.

8. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the SCCIC at California state University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.

9. Notwithstanding Item 8 above, any information that the Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.

XIX. UTILITIES AND SERVICE SYSTEMS

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

The following analysis of the potential utilities and service systems impacts of the Project is based, in part, on the information and conclusions contained within the Echelon Studios Utility Infrastructure Technical Report: Water (Water Infrastructure Report) prepared for the Project by KPFF Consulting Engineers in April 2023, and the Echelon Studios Utility Infrastructure Technical Report: Wastewater (Wastewater Infrastructure Report) prepared for the Project by KPFF Consulting Engineers in April 2023. The Water Infrastructure Report, and the Wastewater Infrastructure Report, are included as Appendix L.1, and Appendix L.2, to this IS/MND, respectively, and their findings, conclusions, and recommendations are incorporated by reference herein. The analysis is also based on the Water Supply Assessment and is included as Appendix L.3 to this IS/MND.

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?

Less Than Significant Impact. A significant impact may occur if a project would require or result in the relocation or construction of water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities to such a degree that the construction or relocation of which could cause significant environmental effects.

Water Facilities

The LADWP currently supplies water to the Project Site. LADWP is responsible for ensuring that water demand within the City is met and that state and federal water quality standards are achieved. The LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes more than 7,336 miles of pipes, and more than 115 storage tanks and reservoirs.[203] Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP treats approximately 600 million gallons per day (gpd).[204] As detailed below in response to Question XIX(b), the Project's domestic water supply demand would be 442,436 gpd. Thus, implementation of the Project is not expected to measurably reduce LAAFP's capacity, and as such, no new or expanded water treatment facilities

203 Los Angeles Department of Water and Power Website, About Us, Water Facts & Figures, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?, accessed: December 2022.

204 Better Buildings U.S. Department of Energy website.

would be required. Moreover, as discussed below, the Project's anticipated water demand is consistent with demand projected under LADWP's UWMP, therefore, it is anticipated that LADWP would be able to meet the Project's water treatment demand and no new infrastructure associated with the storage of water would be required.

Within the vicinity of the Project Site, there is a 16-inch water main in Wilton Place and Santa Monica Avenue, a 4-inch water line in Virginia Avenue, and a 6-inch water line in Saint Andrews Place. LADWP determined on June 22, 2021 that there was not sufficient pressure within the existing 4-inch water main in Virginia Avenue, and noted that the water infrastructure would need to be upgraded to a larger size to provide the necessary flow for the Project. A 6-inch water main was installed in Virginia Avenue in 2021.[205] The LADWP performed a flow test to evaluate the ability of the local water conveyance infrastructure to support the domestic water supply demand of the Project. Based on the results, LADWP has confirmed that the domestic water supply needs of the Project can be met by the existing local water delivery infrastructure and no upgrades to the water mains in the vicinity would be required.[206] However, although a development's domestic water supply demand is the main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure and are, therefore, the primary means for analyzing infrastructure capacity. The water service map provided by the City shows there are three public hydrants in the vicinity of the Project Site. Based on initial conversations with LAFD, three additional fire hydrants are to be installed as part of the Project: one at the corner of Santa Monica Boulevard. & Wilton Place., one mid-block on Virginia Avenue., and one mid-block on Santa Monica Boulevard. Based on fire flow standards set forth in Section 57.507.3 of the LAMC, the Project Site falls within industrial and commercial, which requires 6,000 gpm to 9,000 gpm from six adjacent hydrants flowing simultaneously with a minimum residual pressure of 20 pounds per square inch (psi). The Project would incorporate a fire sprinkler suppression system to reduce or eliminate the demands on public hydrants, which will be subject to Fire Department review and approval during the design and permitting of the Project. Based on Section 94.2020.0 of the LAMC that adopts by reference NFPA 14-2013 including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building would be 1,250 gpm. The LADWP performed a hydraulic analysis of their water system to determine if adequate fire flow is available to the fire hydrants surrounding the Project Site. Following the infrastructure upgrade of the 6-inch water main in Virginia Avenue by LADWP, it has been determined that there is now sufficient capacity to serve the Project with 7,300 gpm from six fire hydrants running simultaneously with a minimum residual pressure of 20 psi. Based on these results, LADWP confirmed that fire flow demands of the Project can be met by the existing local fire hydrant infrastructure and no upgrades to existing hydrants or new hydrants would be required.[207]

The Project would require construction of new, on-site water distribution lines and connections to the off-site water mains. Construction impacts associated with installation of such distribution lines

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205 KPFF Consulting Engineers, Echelon Studios Utility Infrastructure Technical Report: Water, April 2023, page 3. See Appendix L.1 of this IS/MND.

206 City of Los Angeles, Department of Water and Power – Water System, SAR Number 96192, February 2022 and SAR Number 96259, February 2022. See Exhibits 2 and 3 of Appendix L.1 of this IS/MND.

207 City of Los Angeles, Department of Water and Power – Water System, Information of Fire Flow Availability, June 22, 2022 and March 29, 2022. See Exhibit 1 of Appendix L.1 of this IS/MND.

and connections would be primarily limited to trenching. All on-site water line installation and connection to the existing system would be done in coordination and under the approval of the LADWP and, as such, would comply with all applicable LADWP requirements and policies intended to prevent and limit impacts to existing water service lines and adjacent properties. In addition, pursuant to current LADOT approaches for controlling traffic during construction and as detailed in **PDF TR-1** under Checklist Section XVII, Transportation, a formal Construction Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts and would ensure safe pedestrian and vehicular travel during construction, including during off-site connection to the existing water main facilities.

Based on the above, the expansion of off-site water infrastructure would not be required and the construction of new on-site water distribution infrastructure would not result in significant environmental effects. **Accordingly, impacts would be less than significant and no mitigation measures would be required.**

Wastewater Facilities

As detailed below in response to Question XIX(c), the Project's wastewater would be treated by the Hyperion Water Reclamation Plant (HWRP), which has adequate capacity to serve the Project. Accordingly, it is not anticipated that the Project would require the construction of new wastewater treatment facilities.

Based on available record data provided by the City, there is an 8-inch vitrified clay pipe (VCP) sewer line in in Virginia Avenue that flows west to North Wilton Place. There is an 8-inch VCP sewer line and a 6-inch VCP sewer line in North Wilton Place, both of which flow south to Santa Monica Boulevard. There is a 12-inch VCP sewer line in Santa Monica Boulevard that flows west to North Wilton Place. There is an 8-inch VCP sewer line in North Saint Andrews Place that flows north to Virginia Avenue.[208]

As detailed in response to Question XIX(c), the Project would result in a wastewater flow from the Site of 357,649 gpd. Wastewater generated by the Project would be split between the sewer mains located in Virginia Avenue and Santa Monica Boulevard, respectively. The existing capacity of the 8-in sewer line in Virginia Avenue ranges from 0.76 cfs to 0.87 cfs (491,200 gpd to 562,295 gpd). The existing capacity of the 12-inch sewer line in Santa Monica Boulevard is 1.98 cfs (1,279,707 gpd). The Project sewerage discharge would account for 64 percent and 28 percent, of the available capacity of Virginia Avenue and Santa Monica Boulevard, respectively. Pursuant to LAMC Section 64.15, BOS Wastewater Engineering Division made a preliminary analysis of the local and regional sewer conditions to determine if available wastewater conveyance capacity existing to serve the Project's projected generation of wastewater. The BOS's approach consisted of a worst-case scenario envisioning peak demands from the relevant facilities occurring simultaneously on the wastewater system and a combination of flow gauging data and computed results from the City's hydrodynamic model were used to project current and future impacts due

208 KPFF Consulting Engineers, Echelon Studios Utility Infrastructure Technical Report: Wastewater, April 2023, page 3. See Appendix L.2 of this IS/MND.

to additional sewer discharge. Based on the Project's projected wastewater flow and the worst-case scenario modeling conducted, BOS has approved the Project to discharge up to 357,649 gpd of wastewater.[209] Therefore, it is anticipated that the Project would not require the expansion of existing or construction of new regional or local wastewater conveyance infrastructure. In addition, pursuant to current LADOT approaches for controlling traffic during construction and as detailed in **PDF TR-1** under Checklist Section XVII, Transportation, a formal Construction Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts and would ensure safe pedestrian and vehicular travel during construction, including during off-site connection to the existing wastewater facilities.

Based on the above, the expansion of off-site wastewater infrastructure would not be required and the construction of new on-site wastewater infrastructure would not result in significant environmental effects. **Accordingly, impacts would be less than significant and no mitigation measures would be required.**

Stormwater Drainage Facilities

Refer to Question c(iii) in Section X, Hydrology and Water Quality, above for a discussion of stormwater drainage facilities. As discussed there, all building roof drains would be directed to underground drainage devices, all hardscape surfaces would sheet flow toward nearby area drains and would be directed to underground drainage devices capable of treating and storing the 85th percentile rain event. The Project Site is comprised of approximately 100 percent impervious surfaces under existing conditions. The Project would neither increase or decrease the imperviousness of the Project Site. The Project would not increase the rate or volume of stormwater runoff into North Wilton Place and North Saint Andrews Place storm drain mains. Furthermore, the Project would include the installation of LID BMPs, which would mitigate at minimum the first flush or the equivalent of the greater between the 85th percentile storm and first 0.75-inch of rainfall for any storm event.[210] However, should the City determine additional improvements to the stormwater drainage system are necessary during the normal permit review process, the Applicant would be responsible for the improvements, and such improvements would be conducted as part of the Project either on-site or offsite within the right-of-way, and as such, any related construction activities would be temporary and of short duration. Therefore, the construction of new stormwater drainage facilities would not result in significant environmental effects. **Accordingly, impacts related to the construction of new stormwater facilities would be less than significant and no mitigation measures would be required.**

Electric Power Facilities

The LADWP would supply the Project from the existing electrical system. As detailed in response to Question VI(a), LADWP has confirmed that electric service and infrastructure is available in the vicinity of the Project Site and would be provided to the Project in accordance with LADWP Rules

209 City of Los Angeles, Bureau of Engineering, Sewer Capacity Availability Request, Sanitation SCAR ID: 70-6338-1122, November 8, 2022. See Exhibit 1 of Appendix L.2 of this IS/MND.

210 KPFF Consulting Engineers, Echelon Studios Utility Infrastructure Technical Report: Hydrology & Water Quality, April 2023, page 3. See Appendix H of this IS/MND.

and Regulations and that the estimated power requirement of the Project has been accounted for in the planned growth of the power system.[211] As such, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand and no new sources of electricity or off-site generation or transmission facilities would be required to support the Project.

However, the Project would require the installation of new on-site electrical distribution facilities and connection to the off-site electrical system. Construction impacts associated with installation of such distribution lines and connections would be primarily limited to trenching. All on-site electrical line installation and connection to the existing system would be done in coordination and under the approval of the LADWP and, as such, would comply with all applicable LADWP requirements and policies intended to prevent and limit impacts to existing electrical systems and adjacent properties. In addition, pursuant to current LADOT approaches for controlling traffic during construction and as detailed in **PDF TR-1** under Checklist Section XVII, Transportation, a formal Construction Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts and would ensure safe pedestrian and vehicular travel during construction, including during off-site connection to the existing electrical facilities.

Based on the above, the expansion of off-site electric power sources and infrastructure would not be required and the construction of new on-site electric power distribution facilities would not result in significant environmental effects. **Accordingly, impacts would be less than significant and no mitigation measures would be required.**

Natural Gas Facilities

SoCalGas would supply the Project from the existing natural gas facilities. As detailed in response to Question VI(a), SoCalGas has confirmed that natural gas supply infrastructure is available in the vicinity of the Project Site and that service would be provided in accordance with SoCalGas policies and rules on file with the California Public Utilities Commission.[212] SoCalGas notes that the availability of supplies is based upon natural gas supply conditions and is subject to change; however, as discussed in Question VI(a), the Project's operational natural gas demand would represent an insignificant percentage of SoCalGas' available supplies. Therefore, it is expected that the Project would not require new or expanded sources of natural gas or off-site natural gas storage and pipeline infrastructure.

However, the Project would require construction of new, on-site gas distribution lines to serve the new buildings. Construction impacts associated with installation of on-site natural gas distribution lines would be primarily limited to trenching. All on-site natural gas line installation and connection to the existing system would be done in coordination and under the approval of the SoCalGas

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211 KPFF Consulting Engineers, Echelon Studios Utility Infrastructure Technical Report: Water, April 2023, page 3. See Appendix L.1 of this IS/MND.

212 Southern California Gas Company, Letter Correspondence from Jason Sum, Pipeline Planning Associate, SoCalGas-Compton HQ, Maps & Will Serve – 6501-5673 W. Santa Monica Blvd, 5612-5675 W. Virginia Ave, 1110-1118 N. Wilton Pl, August 2, 2021. See Exhibit 2 in Appendix E of this IS/MND.

and, as such, would comply with all applicable SoCalGas requirements and policies intended to prevent and limit impacts to existing natural gas facilities and adjacent properties. In addition, pursuant to current LADOT approaches for controlling traffic during construction and as detailed in **PDF TR-1** under Checklist Section XVII, Transportation, a formal Construction Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts and would ensure safe pedestrian and vehicular travel during construction, including during off-site connection to the existing natural gas facilities.

Based on the above, the expansion of off-site natural gas supplies, storage, and infrastructure would not be required and the construction of new on-site natural gas distribution facilities would not result in significant environmental effects. **Accordingly, impacts would be less than significant and no mitigation measures would be required.**

Telecommunication Facilities

Construction-related activities, including grading and excavation, could encroach on existing on-site telecommunication facilities. However, before construction begins, the Project Applicant would be required to coordinate with applicable regulatory agencies and telecommunication providers to locate and avoid or implement the orderly relocation of telecommunication facilities that need to be removed or relocated. In addition, pursuant to current LADOT approaches for controlling traffic during construction and as detailed in **PDF TR-1** under Checklist Section XVII, Transportation, a formal Construction Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts and would ensure safe pedestrian and vehicular travel during construction, including during off-site connection to off-site telecommunication facilities. Therefore, the relocation of telecommunication facilities would not result in significant environmental effects. Furthermore, telecommunication services are provided by private companies, the selection of which is at the discretion of the Applicant and/or the successor on an ongoing basis. Upgrades to existing telecommunication facilities and construction of new facilities to meet the demand of users during operation would be determined by providers and would be subject to its own environmental review. **Accordingly, impacts to telecommunication facilities would be less than significant and no mitigation measures would be required.**

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

Less Than Significant Impact. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers.

The City's water supply primarily comes from the Los Angeles-Owens River Aqueduct, state Water Project, and from the Metropolitan Water District of Southern California (MWD), which is obtained from the Colorado River Aqueduct, and to a lesser degree from local groundwater sources. LADWP's *2020 Urban Water Management Plan* (2020 UWMP) confirmed that despite an increase in population of over one million people, over the last 20 years, the City's water demand has been reduced by 29 percent; with the average water usage below the average usage

in the 1970s.[213] The City is also focused on increasing locally produced water supplies, including conservation, water use efficiency, stormwater recycling, and maximizing water reuse from the Hyperion Water Reclamation Plant (Operation NEXT), and will continue to pursue and/or investigate alternative water supply options, such as water transfers, groundwater banking, brackish groundwater recovery, and seawater desalination. Based on these approaches, the 2020 UWMP projects future water demand within the City under single-dry years, average, and multiple-dry years hydrological conditions through the 2045 planning horizon year and identifies existing and potential supplies available to continue to meet demand. Projected future water demands and available supply amounts for the City are presented in Table 4.24, *LADWP Water Supply and Demand Projections*.

Table 4.24
LADWP Water Supply and Demand Projections

Hydrological Condition	2025 (AFY)	2030 (AFY)	2035 (AFY)	2040 (AFY)	2045 (AFY)	Change Over Planning Period (AFY)
Single-Dry Years						
Total Supplies	674,700	693,200	712,700	732,700	746,000	72,000
Total Demands	674,700	693,200	712,700	732,700	746,000	72,000
Average Years						
Total Supplies	642,600	660,200	678,800	697,800	710,500	67,900
Total Demands	642,600	660,200	678,800	697,800	710,500	67,900
Multiple-Dry Years (Year 1)						
Total Supplies	657,900	675,800	694,900	714,400	727,400	69,500
Total Demands	657,900	675,800	694,900	714,400	727,400	69,500
Multiple-Dry Years (Year 2)						
Total Supplies	661,700	679,700	698,900	718,500	731,500	69,800
Total Demands	661,700	679,700	698,900	718,500	731,500	69,800
Multiple-Dry Years (Year 3)						
Total Supplies	674,800	693,200	712,800	732,700	746,000	71,200
Total Demands	674,800	693,200	712,800	732,700	746,000	71,200
Multiple-Dry Years (Year 4)						
Total Supplies	661,600	679,600	698,900	718,400	731,500	69,900
Total Demands	661,600	679,600	698,900	718,400	731,500	69,900
Multiple-Dry Years (Year 5)						
Total Supplies	655,700	673,600	692,600	712,000	724,900	69,200
Total Demands	655,700	673,600	692,600	712,000	724,900	69,200

AFY = acre-feet per year
1 Source: City of Los Angeles, Department of Water and Power, 2020 Urban Water Management Plan, Certified May 25, 2021, Exhibits ES-R, ES-S, and ES-T, pages ES-20 through ES-24.

During construction, water supplies would be required for dust control, cleaning of equipment, and excavation/export, removal, and re-compaction of soil. As described above in Question XIX(a), a conservative estimate of construction water use ranges from 1,000 to 2,000 gpd. This water demand would be significantly less than the Project's operational demand, which, as

213 City of Los Angeles, Department of Water and Power, 2020 Urban Water Management Plan, Certified May 25, 2021, page ES-3, https://www.ladwp.com/cs/groups/ladwp/documents/pdf/mdaw/nzyy/~edisp/opladwpccb762836.pdf, accessed December 2022.

described below, would be within the supply capabilities of the provider during normal, dry, and multiple-dry years. As such, it is anticipated that the water supply demand of Project construction would be adequately met through existing water supplies.

Based on Bureau of Sanitation (BOS) sewer generation rates, the Project's Water Infrastructure Report projects that operation of the Project would require 442,436 gpd (496 acre-feet per year [AFY]) to meet domestic demand. As shown in Table 4.24, annual water demand within the City is projected to increase over the planning period by between 67,200 AFY and 72,000 AFY. The Project's estimated 496 AFY demand would represent between 0.74 percent and 0.69 percent of the projected increase in annual water demand of between 67,200 AFY and 72,000 AFY from 2025 to 2045. Moreover, as also shown in Table 4.24, LADWP projects sufficient water supplies to meet all demands through the planning period under all hydrological conditions. As detailed in Checklist Section XIV, Population and Housing, the employment growth associated with the Project would be consistent with the forecasted growth for the City by 2045. Accordingly, the Project's water demand has been accounted for within LADWP's projections and would not exceed the water demand estimates of the 2020 UWMP.

In addition, the Project water demand of the Project is conservative as the BOS rates do not account for any water saving features that may be implemented by development projects. In accordance with Title 20 and 24 of the California Administrative Code, and as required by LAMC Sections 122.00 - 122.10 and the City's Green Building Code Section 99.4.303, the Project would be required to implement water saving features to reduce the amount of water used by the Project including high-efficiency toilets and low-flow faucets. All fixtures would be required to meet applicable flush volumes and flow rates. The Project would also be required to adhere to the City's Irrigation Guidelines and utilize smart irrigation with automatic sensors to determine when irrigation is needed and when irrigation should be suspended due to rain or wind conditions. These features would reduce the projected water demand of the Project.

As such, the Project would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple-dry years. **Therefore, impacts would be less than significant and no mitigation measures would be required.**

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

Less Than Significant Impact. The Project Site is located within the Hyperion Sewer System Service Area, which is operated and maintained by the City's BOS. The existing design capacity of the Hyperion Sewer System Service Area is approximately 550 million gallons per day (consisting of 450 MGD at the Hyperion Water Reclamation Plant (HWRP), 80 MGD at the Donald C. Tillman Water Reclamation Plant, and 20 MGD at the Los Angeles–Glendale Water

Reclamation Plant).[214] Wastewater from the Project Site would be conveyed from the Project Site via the City's existing wastewater infrastructure to the HWRP. The HWRP treats an average daily flow of 300 million gallons per day (mgd) in dry weather.[215] This equals a typical remaining capacity of 150 mgd of wastewater able to be treated at the HWRP.

Wastewater generation would occur incrementally throughout construction of the Project as a result of construction workers on-site. However, construction workers would utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. As such, wastewater generation from Project construction activities is not anticipated to cause any increase in wastewater flows, and would represent a decrease in wastewater flow produced at the Site as compared to operation of the existing use.

Operation of the Project would generate wastewater flows related to the proposed uses, as well as a result of the Project's sewage ejector. A sewage ejector operates similarly to a groundwater sump pump and is intended to store sewage, including liquids and solids, until its design volume is reached, at which point the stored volume of sewage is pumped to municipal sewer lines located at a higher elevation. According to the Project's Wastewater Infrastructure Report, operation of the Project would result in a wastewater flow from the Site of 442,436 gpd, including the Project's sewer ejector design volume of 360,000 gpd. This volume of wastewater would represent 0.08 percent of the total design capacity Hyperion Sewer System Service Area and 0.29 percent of the remaining capacity of the HWRP.

Based on the above, the Project would result in a determination by BOS that it has adequate capacity to serve the Project's projected demand in addition to their existing commitments. **As such, impacts would be less than significant and no mitigation measures would be required.**

d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste.

Waste disposal sites (i.e., landfills) are operated by the City and County as well as by private companies. In addition, transfer stations temporarily store debris until larger haul trucks are available to transport the materials directly to the landfills. Landfill availability is limited by several factors, including: (1) restrictions to accepting waste generated only within a particular landfill's jurisdiction and/or watershed boundary, (2) tonnage permit limitations, (3) types of waste, and (4) operational constraints. Planning to serve long-term disposal needs is constantly being conducted at the regional level (e.g., siting new landfills within the County and transporting waste outside the

214 City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer System Management Plan Hyperion Sanitary Sewer System, January 25 2019.

215 KPFF Consulting Engineers, Echelon Studios Utility Infrastructure Technical Report: Wastewater, April 2023, page 8. See Appendix L.2 of this IS/MND.

region). Most commonly, the City is serviced by the Sunshine Canyon Landfill. The landfill accepts mixed municipal, inert, industrial, green materials, and construction/demolition waste. Solid waste from the Project area is transported to the Sunshine Canyon Landfill for disposal by private waste haulers. The average daily intake of the Sunshine Canyon Landfill is approximately 7,582 tons and the permitted daily intake is 12,100 tons per day.[216]

Construction of the Project would generate construction and demolition waste. Demolition waste would consist primarily of debris from the demolition of the existing 98,352-square-foot building that would be disposed of as inert waste and is estimated to total approximately 7,770 tons.[217] Construction of the Project building is estimated to generate a total of approximately 993 tons of solid waste.[218] This forecasted solid waste generation is a conservative estimate as it assumes no reductions in solid waste generation would occur due to recycling. As required by City Ordinance No. 181,519, the construction and demolition waste would be delivered to City certified construction and demolition waste processors where it would be recycled as feasible. Moreover, the *Countywide Integrated Management Plan 2020 Annual Report* concludes that there is current capacity of 54.08 million tons available at Sunshine Canyon Landfill.[219] Therefore, the Project-generated demolition debris of 7,770 tons and construction waste of 993 tons would represent a very small percentage of the inert waste disposal capacity in the region.

During operation, the Project would generate solid waste that is typical of a production studio and creative office campus use and would be consistent with all federal, state, and local statutes and regulations regarding proper disposal. As shown in Table 4.25, *Project Estimated Daily Solid Waste Generation*, the Project would generate approximately 21,502 pounds (or 10.8 tons) per day of net solid waste. As discussed below in response to Section XIX(e), AB 939 was enacted to reduce, recycle, and reuse solid waste generated in the state to the maximum extent feasible. Specifically, AB 939 required cities and counties to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal by 2000. AB 939 also required each city and county to promote source reduction, recycling, and safe disposal or transformation. All solid waste-generating activities within the City, including the Project, would continue to be subject to the requirements set forth in AB 939. Therefore, it is assumed that the Project would divert 50 percent of its solid waste generated, thereby diverting this waste from landfills. Nonetheless, it is

216 California Integrated Waste Management Board, Solid Waste Information System, Facility/Site Summary Details Website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/259?siteID=4702 , accessed May 2022.

217 A demolition waste generation rate of 158.00 pounds per square foot was used. 98,352 square feet of demolition multiplied by 158.00 pounds is 15,539,616 pounds. 15,539,616 pounds * 0.0005 tons = 7,770 tons. Source: U.S. Environmental Protection Agency (EPA), Estimating 2003 Building-Related Construction and Demolition Materials Amounts, Table 2-4, Summary of Nonresidential Demolition Job Site surveys of C&D Materials, accessed July 2022.

218 A construction waste generation rate of 3.89 pounds per square foot for nonresidential construction was used. 510,621 square feet of nonresidential construction multiplied by 3.89 pounds is 1,986,315 pounds. 1,986,315 pounds*0.0005 tons=993 tons. Source: USEPA Report No. EPA A530-98-010, Characterization of building Related Construction and Debris in the United States, Table 4, Estimated Generation of Nonresidential Construction Debris, June 1998.

219 County of Los Angeles Department of Public Works, Countywide Integrated Management Plan 2020 Annual Report, Appendix E-2, Table 4, October 2021.

Table 4.25
Project Estimated Daily Solid Waste Generation

Land Use	Size	Generation Rate for Employees[a]	Employees	Generation Rate (pounds/ employee/day)[b]	Total Generation (pounds/day)
Office Use	388,286 sf	.004 employees/sf	1,553	10.53	16,353
Restaurant Use	12,378 sf	.004 employees/sf	50	10.53	527
Production Use	91,870sf	.004 employees/sf	367	10.53	3,864
Production Support Use	18,087 sf	.004 employees/sf	72	10.53	758
Total Project Solid Waste Generation					**21,502**

Notes: sf = square feet

[a] *Source for generation rate: City of Los Angeles VMT Calculator Documentation, Version 1.3, LADOT, Los Angeles Department of Transportation and Los Angeles Department of City Planning, Table 1, Land Use and Trip Generation Base Assumptions, May 2020. Accessed September 10, 2021.*

[b] *Source: City of Los Angeles CEQA Thresholds, 2006, accessed May 2022.*

Source (table): EcoTierra Consulting, May 2022.

conservatively assumed that all 19,396 pounds per day of the Project's solid waste would be disposed of at regional landfills. The Sunshine Canyon Landfill's permitted daily intake of 12,100 tons per day would have capacity to accept the net daily operational waste generated by the Project under the existing permitted amount. Therefore, the Project would not generate solid waste in excess of state and local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. **Therefore, impacts would be less than significant and no mitigation measures are required**.

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste generated on-site by the Project would be disposed of in accordance with all applicable federal, state, and local regulations, related to solid waste, such as AB 939.

Consistency with California Integrated Waste Management Act of 1989

All local governments, including the City of Los Angeles, are required under AB 939 to develop source reduction, reuse, recycling, and composting programs to reduce tonnage of solid waste going to landfills. The AB 939 requirement to reduce the solid waste stream in landfills by 50 percent means that half of the Project's net total solid waste generated (17,322 pounds per day) must be recycled rather than disposed of in a landfill. The Project would be required to comply with AB 939 requirements and approximately 50 percent of the Project's waste would be diverted for reuse or recycling; the remaining solid waste generated during operation would be disposed of in landfills. The Project would also be required to comply with the Bureau of Sanitation Solid Resources Infrastructure Facility Plan to reduce the amount of solid waste being disposed into

landfills by promoting diversion techniques that increase recycling of solid waste, consistent with AB 939. Therefore, the Project would not substantially increase solid waste generation in the City or the amount disposed into the landfills. Accordingly, the Project would be consistent with AB 939.

Consistency with the City of Los Angeles General Plan Framework Element

The Framework Element of the City of Los Angeles General Plan also supports AB 939 and its goals by encouraging "an integrated solid waste management system that maximizes source reduction and materials recovery and minimizes the amount of waste requiring disposal."[220] The Project would implement strategies to create minimal waste and utilize recycled materials, which in turn would reduce the number of refuse haul trips. The Project would include enclosed trash areas and recycling storage areas and divert 50 percent of the construction waste debris away from landfills. The Project would be consistent with the City of Los Angeles General Plan Framework goal of maximizing source reduction and materials recovery, and minimizing the amount of waste requiring disposal. Therefore, the Project would be consistent with the Framework Element.

Consistency with City of Los Angeles Zero Waste Plan

The City's Zero Waste Plan, also known as the Solid Waste Integrated Resources Plan (SWIRP), identifies a long term plan through 2030 for the City of Los Angeles's solid waste programs, policies and environmental infrastructure. The Zero Waste Plan aims for the City of Los Angeles to achieve a goal of 90 percent diversion by 2025. This targeted diversion rate would be implemented through an enhancement of existing policies and programs such as implementing additional downstream programs (e.g., adding textiles to the blue bin recycling program; adding food scraps to the green bin recycling program; and requiring private solid waste collection service to provide access to multifamily and commercial customers); implementation of mandatory participation programs for residential, government, commercial, industrial, and institutional users; requiring transfer stations and landfills to provide resource recovery centers; and increased diversion requirements at construction and demolition facilities new policies and programs, and the development of future recycling facilities.[221] The Project would include enclosed trash areas and recycling storage areas and would divert construction waste debris away from landfills. The Project would also be consistent with the City's Zero Waste Plan goal of minimizing the amount of waste requiring disposal through green bin recycling program. Therefore, the Project would be consistent with the City's Zero Waste Plan.

Consistency with the Los Angeles Municipal Code

The LAMC requires a project to be designed to incorporate a recycling area or room.[222] The Project would be required to comply with this requirement and have sufficient containers to accommodate the amount of solid waste and recycling generated by the premises, and landscape

220 Los Angeles Department of City Planning, Citywide General Plan Framework, 1996, page 9-11.

221 Los Angeles Sanitation, Solid Waste Integrated Resources Plan – A Zero Waste Master Plan, October 2013, https://www.lacitysan.org/san/ sandocview?docname=cnt012522, accessed January 13, 2022.

222 Los Angeles Municipal Code, Section 12.21.A.19.c.

waste would be placed in designated green waste bins. Therefore, the Project would be consistent with the LAMC.

Therefore, based on the above, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. **Therefore, impacts would be less than significant and no mitigation measures are required**.

XX. WILDFIRE

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

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The Project Site is not located within or near a state responsibility area or an area classified with very high fire hazard severity.[223] Immediately south of the Project Site is West Santa Monica Boulevard, which is a designated disaster route and may be used for

223 City of Los Angeles Department of City Planning, Zone Information & Map Access System; and City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles, Adopted November 1996.

an evacuation during an emergency.[224] The Project constitutes a private development located on private land and does not propose alteration to the public rights-of-way abutting the Project Site other than what is required by the City. While it is expected that the majority of construction activities for the Project would primarily be confined on-site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day as required by the City, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project does not propose the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from the surrounding streets. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. Therefore, the Project would not result in inadequate emergency access to the Project Site or surrounding uses, and the Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan. **Therefore, impacts would be less than significant and no mitigation measures are required**.

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

No Impact. For projects in or near state responsibility areas or an area classified with very high fire hazard severity, a significant impact may occur if a project were to expose people to pollutant concentrations from a wildfire or in the path of an uncontrolled spread of a wildfire. The Project Site is located within an urban area and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not within a Very High Fire Hazard Severity Zone,[225] nor is the Project Site or surrounding area within a wildland fire hazard area.[226] As such, the Project would not exacerbate wildfire risks. **Therefore, no impact would occur and no mitigation is required**.

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?

Less Than Significant Impact. The Project Site is not located within or near a state responsibility area or an area classified with very high fire hazard severity.[227] The Project would involve the demolition of an existing vacant commercial building and surface parking lot, and construction of a new building in an urban area. No new roads, fuel breaks, or emergency water sources would be installed or maintained. Installation of any required power lines or other utilities would be done

224 Los Angeles County Department of Public Works, Disaster Route Maps, City of Los Angeles Central Area and City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles, Adopted November 1996.

225 City of Los Angeles Department of City Planning, Zone Information & Map Access System.

226 City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit D, Selected Wildlife Hazard Areas in the City of Los Angeles, Adopted November 1996.

227 City of Los Angeles Department of City Planning, Zone Information & Map Access System; and City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles, Adopted November 1996.

in a manner consistent with other construction projects typical of urban development requiring connection to the existing utility grid and infrastructure and in accordance with applicable City building codes and utility provider policies and would not exacerbate wildfire risk. **Therefore, impacts would be less than significant and no mitigation measures are required**.

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

No Impact. The Project Site is not located within or near a state responsibility area or an area classified with very high fire hazard severity.[228] The Project would be required to comply with all developmental regulations and City building codes with regard to fire safety and would not exacerbate the potential for secondary wildfire risks at the Project Site. Any installation of on-site power lines required to provide the Project with electricity and connections to existing power lines would be conducted in coordination and under the supervision of the utility provider. Further, the Project Site and the surrounding vicinity is relatively flat with no major slopes that would be susceptible to flooding or landslide are located nearby. **Therefore, no impacts would occur and no mitigation measures are required**.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐

228 City of Los Angeles Department of City Planning, Zone Information & Map Access System; and City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles, Adopted November 1996.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

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

Less Than Significant Impact. A significant impact may occur if a project, in conjunction with other related projects in the area of the project site, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together.

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

The Project Site is currently improved with a surface parking lot and the former three-story Sears building originally constructed in 1928 and consisting of approximately 98,352 square feet. Generally, properties eligible for listing in the National Register are at least 50 years old. The California Office of Historic Preservation generally recommends an evaluation of buildings and structures older than 45 years of age by professionals meeting the Secretary of the Interior Standards Professional Qualifications for Architectural History and Archeology.

There are no historical resources on the Project Site. The existing building at 5601 West Santa Monica Boulevard was constructed for Sears, Roebuck and Company in 1928. And was designed by architect George C. Nimmons. Although it originally reflected features of the Mediterranean Revival architectural style, it has been completely altered. The building was not identified as individually eligible for historic designation in any previous survey, and it is not located within a designated or potential historic district.

Based on observation of the building, a review of primary and secondary sources, and an analysis of the eligibility criteria for listing in the National Register of Historic Places, the California Register of Historical Resources, and as a City of Los Angeles Historic-Cultural Monument, the Historic Report confirmed previous survey findings that did not identify the building as eligible for historic

designation. Therefore, the building is not considered a historical resource as defined by CEQA, and its demolition would not have a significant effect on the environment.

The Project would not demolish, destroy, relocate, or alter any other nearby historical resources, and thus would not impair the historical significance of any other designated or potential historical resources in the Study Area. Although the Project would alter the setting of immediately adjacent historical resources, this change would not affect any of the nearby resources' eligibility for designation at the federal, state, or local levels. Therefore, impacts would be less than significant.

The Project Site is located within an urbanized area of the City and has been subject to grading and development in the past. Therefore, surficial archaeological resources that may have existed at one time have likely been previously disturbed. With adherence to the City's condition of approval consistent with CEQA Section 21083.2, the Project would not cause a substantial adverse change in the significance of an archaeological resource. Therefore, impacts would be less than significant.

As the Project Site has been previously graded and developed, surficial paleontological resources that may have existed at one time have likely been previously disturbed. With adherence to the City's condition of approval, the Project would not directly or indirectly destroy a unique paleontological resource. Therefore, impacts would be less than significant.

With regard to a unique geologic feature, the Project Site is currently developed with one building and surface parking and there are no unique geologic features on the Project Site. The Project would not directly or indirectly destroy a unique geologic feature. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project, in conjunction with other related projects in the area of the project site, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together.

In accordance with CEQA Guidelines Section 15064(h), this IS/MND includes an evaluation of the Project's cumulative impacts. An adequate discussion of a project's significant cumulative impact, in combination with other closely Related Projects, can be based on either: (1) a list of past, present, and probable future related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect. (CEQA Guidelines Section 15130(b)(1)(A)-(B). The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. Accordingly, all proposed, recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment, when considered in conjunction with the Project, were identified for evaluation.

There are seven Related Projects as shown in Table 4.26, *List of Related Projects*, in the general vicinity of the Project Site that were identified in the Project's Traffic Assessment. Only one of these are within direct vicinity of the Project Site (i.e., within 500 feet). The nearest Related Projects include: No. 7, apartments located 89 feet (0.02 miles) south of the Project Site. The rest of the Related Projects are greater than 1,000 feet away, distances which ensure that any other localized impacts of the Related Projects would not combine with the Project.

Aesthetics

Development of the Project in conjunction with the Related Projects would result in an incremental intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. With respect to aesthetics and views, and shade and shadow impacts, none of the Related Projects are located in proximity to the Project Site such that their development would affect the aesthetic character of the Project Site or its immediate surroundings. There are no scenic or protected views in the area. Views in the immediate area would not be affected by the Project or the nearest Related Project. Development of the Related Projects is expected to occur in accordance with adopted plans and regulations. As per ZI No. 2145 and SB 743, aesthetic impacts "shall not be considered significant impacts on the environment." **Thus, the Project would not be cumulatively considerable. Therefore, cumulative aesthetic impacts would be less than significant.**

Table 4.26
List of Related Projects

No.	Project Location	Land Use	Size
1	5245 Santa Monica Boulevard	Apartments Retail	68 units 51,674 sf.
2	5460 Fountain Avenue	Apartments	75 units
3	5632 De Longpre Avenue	Apartments	185 units
4	5430 Virginia Avenue	Apartments	65 units
5	5731 Santa Monica Boulevard	Office	180,073 sf
6	5420 Santa Monica Boulevard	Apartments Commercial	735 units 95,000 sf
7	5640 W. Santa Monica Boulevard	Apartments	179 units

Source: Overland Traffic Consultants, Inc. August 2022.

Agriculture and Forestry Resources

Development of the Project in combination with the Related Projects would not result in the conversion of state-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of forest land or conversion of forest land to non-forest use. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category. The Project Site and the surrounding area are highly urbanized area and do not include any state-designated agricultural lands or forest uses. **Therefore, the Project would not make a**

cumulatively considerable contribution to any potential cumulative impacts and no cumulative impacts to agricultural or forestry resources would occur.

Air Quality

In accordance with the SCAQMD methodology, projects that do not exceed the SCAQMD criteria or can be mitigated to less than criteria levels are not significant and do not add to the overall cumulative impact. The Project does not exceed any of the thresholds of significance and therefore is considered less than significant. Additionally, the Project would be in compliance with the assumptions of the AQMP. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts and cumulative air quality emissions would be less than significant.**

As with the Project, construction of the Related Projects is expected to involve standard construction activities and potential construction odors would include diesel exhaust emissions, roofing, painting, and paving operations. There would be situations where construction activity odors would be noticeable by residents nearby each of the related construction sites. However, similar to the Project, the Related Projects are also required to comply with SCAQMD Rule 402, and these temporary odors are typical of construction activities and are generally not considered to be objectionable. Additionally, these odors would dissipate rapidly from the source with an increase in distance and construction activities would be subject to applicable construction and air quality regulations (including proper maintenance of machinery) in order to minimize engine emissions. Construction of the Project is not expected to contribute to substantial odors at sensitive uses near any of the other related construction sites in the local vicinity. **Therefore, cumulative odor impacts resulting from construction activities would not be considerable or significant.**

Biological Resources

The Project would not impact any protected trees. The Project would have no impact upon biological resources. Development of the Project in combination with the Related Projects would not significantly impact wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFG or the USFWS. No such habitat occurs in the vicinity of the Project Site or Related Projects due to the existing urban development. Development of any of the Related Projects would be subject to the City of Los Angeles Protected Tree Ordinance. The Related Projects have no habitats, as they are infill developments. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative impacts to biological resources will be less than significant.**

Cultural Resources

The Project and Related Projects would comply with applicable federal, state, and city regulations that would preclude significant cumulative impacts regarding cultural resources. This resource area is site and locally specific so that each Related Project would need to be evaluated within its own site-specific context. In addition, any Related Project within a historic district or affecting a

historic resource would require a historic resource evaluation to ensure that removal of an existing building, addition of a new building, and/or conversion would not impact the historic resource in the area. The Project will have no impact on a historic resource on the Project Site and a less than significant impact on off-site historic resources, archeological resources, paleontological resources, and human remains, with implementation of required regulatory compliance measures. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative impacts on cultural resource will be less than significant.**

Energy

The geographic context for the cumulative analysis of electricity is LADWP's service area and the geographic context for the cumulative analysis of natural gas is SoCalGas's service area. Growth within these geographies is anticipated to increase the demand for electricity and natural gas, as well as the need for energy infrastructure, such as new or expanded energy facilities.

Buildout of the Project, the Related Projects, and additional growth forecasted to occur within the service area of LADWP would increase electricity consumption during Project construction and operation and thus, cumulatively increase the need for electrical supplies and infrastructure capacity, such as new or expanded electrical facilities. LADWP forecasts that its net electrical load in the 2025 fiscal year (the Project's buildout year) will be 23,537 GWhr of electricity.[229]

Based on the Project's estimated net new electrical consumption of 12,666.3 MWh (12.67 GWhr) and LADWP's forecast of 23,033 GWhr, the Project would account for approximately 0.054 percent of LADWP's projected net electrical load for the Project's build-out year. Furthermore, there are 7 Related Projects, which consist of, but are not limited to, residential, office, and retail/commercial. The total increase in electrical demand for the Related Projects would be approximately 9,887,969 KWh (9.89 GWhr). Combined with the Project, the net increase in electrical demand would be approximately 22.56 GWhr. The estimated net increase in electrical demand resulting from the build-out of the Related Projects combined with the Project, would represent approximately 0.096 percent of the LADWPs forecast for the net electrical load in the fiscal year 2025. Refer to Exhibit 3 for a breakdown of the Related Projects and associated electrical consumption. Moreover, LADWP's projections show there will be sufficient electricity supplies up through 2037 in its 2017 SLTRP, which projections take into account growth expected within LADWP's service area.[230]

Although Project construction and operation would result in the irreversible use of renewable and non-renewable electricity resources which could limit their future availability, the Project's use of such resources would be on a relatively small scale and would be consistent with the growth expectations for LADWP's service area.[231] Furthermore, like the Project, during construction and operation, other future development projects would be expected to incorporate energy

229 LADWP, 2017 Power Strategic Long-Term Resource Plan, Appendix A, Table A-1.

230 LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017. https://efiling.energy.ca.gov/getdocument.aspx?tn=227897

231 Ibid.

conservation features, comply with applicable regulations including CALGreen and state energy standards under Title 24, and incorporate mitigation measures, as necessary. Moreover, even now, LADWP receives a substantial portion of its electricity from renewable resources. In 2020, LADWP reported that 34 percent of its electricity came from renewable resources in Year 2019, and Senate Bill 350 requires LADWP to receive at least 50 percent of its electricity from renewable resources by 2030. **Accordingly, the Project's contribution to cumulative impacts related to electricity consumption would not be cumulatively considerable and, thus, would be less than significant.**

Electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. As described in LADWP's 2017 SLTRP, LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards.[232] LADWP has indicated that the 2017 SLTRP incorporates the estimated electricity requirement for the Project. The 2017 SLTRP considers future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements.[233] Development projects within the LADWP service area, including the Project, would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Like the Project, each of the Related Projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in their respective areas. **As such, the Project's contribution to cumulative impacts with respect to electricity infrastructure would not be cumulatively considerable and, thus, would be less than significant.**

Buildout of projects in SoCal Gas' service area are expected to increase natural gas consumption during project construction and operation and thus, cumulatively increase the need for natural gas supplies and infrastructure capacity. Based on the 2022 CGR the California Energy Commission estimates the total capacity available within SoCal Gas' planning area will be approximately 2,970 million cubic feet per day in 2025. After subtracting the estimated 2,280 million cubic feet per day that is anticipated to be used, the remaining available gas supply would be 690 million cubic feet per day.[234] Based on the Project's estimated net daily natural gas consumption of approximately 3,100 British thermal unit (BTU) per year (2,990 cubic feet per year or 8.19 cubic feet per day), and SoCal Gas' projected 690 million cubic feet availability per day in 2025, the Project would account for approximately 0.0000012 percent of SoCal Gas projected additional capacity for the Project's build-out year. Furthermore, there are 7 Related Projects, which consist of, but are not limited to, residential, office, and retail/commercial. The total increase in gas demand for the Related Projects is approximately 17,126,206 cubic feet per year (46,921 cubic feet per day). Combined with the Project, the net increase in gas demand is approximately 17,132,196 cubic feet per year (46,938 cubic feet per day). The estimated net increase in gas demand resulting

232 Ibid.

233 Ibid.

234 California Gas and Electric Utilities, 2022 California Gas Report.

from the build-out of the Related Projects combined with the Project, would represent approximately 0.0068 percent of the SoCalGas availability in the fiscal year 2025. Refer to Exhibit 3 for a breakdown of the Related Projects and associated gas consumption. SoCal Gas' forecasts take into account projected population growth and development based on local and regional plans. Moreover, SoCal Gas's projections show there will be sufficient gas supplies up through 2035 in the 2022 CGR, which take into account growth expected within SoCal Gas's service area.[235]

Although construction and operation of the Project would result in the irreversible use of natural gas resources which could limit future availability, the Project's use of such resources would be on a relatively small scale and would be consistent with regional and local growth expectations for SoCal Gas' service area. Furthermore, like the Project, during project construction and operation other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and state energy standards under Title 24, and incorporate mitigation measures, as necessary. **Accordingly, the Project's contribution to cumulative impacts related to natural gas consumption would not be cumulatively considerable and, thus, would be less than significant.**

Natural gas infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by SoCal Gas occur as needed.[236] It is expected that SoCal Gas would continue to expand delivery capacity, if necessary, to meet demand increases within its service area.[237] Development projects within its service, including the Project, area would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate.[238] **As such, the Project's potential impacts with respect to natural gas infrastructure would not be cumulatively considerable and, thus, would be less than significant.**

Geology and Soils

Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Project and any of the Related Projects. Similar to the Project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the Related Projects would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the Project's geology and soils impacts concluded that Project impacts would be less than significant levels. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative geology and soil impacts would be less than significant.**

Greenhouse Gas Emissions

A cumulatively considerable impact would occur where the impact of the Project in addition to the Related Projects would be significant. However, in the case of global climate change, the

235 Ibid.
236 Ibid.
237 Ibid.
238 Ibid.

proximity of the Project to other GHG emission generating activities is not directly relevant to the determination of a cumulative impact because climate change is a global condition. According to CAPCOA, "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective." As noted above, the analysis of the Project's impact is a cumulative analysis and no further discussion is required. **Given that the analysis above found that the Project GHG impacts would be less than significant, the Project's cumulative impacts would also be considered less than significant.**

Hazards and Hazardous Materials

Hazards are site-specific and there is little, if any, cumulative hazardous relationship between the Project and any of the Related Projects. Similar to the Project, potential impacts related to hazards would be assessed on a case-by-case basis and, if necessary, the applicants of the Related Projects would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the Project's hazards and hazardous materials impact concluded that Project impacts would be less than significant levels. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative hazard and hazardous materials impacts would be less than significant.**

Hydrology and Water Quality

Surface Water Hydrology

The geographic context for the cumulative impact analysis on surface water hydrology is the Ballona Creek Watershed. The Project in conjunction with forecasted growth in the Ballona Creek Watershed could cumulatively increase stormwater runoff flows. However, as noted above, the Project would be designed so that it would have no net impact on stormwater flows. Also, in accordance with City requirements, Related Projects and other future development projects would also be required, similar to the Project, to implement BMPs to manage stormwater in accordance with LID guidelines. The City of Los Angeles Department of Public Works would review each future development project on a case-by-case basis to ensure that sufficient local and regional infrastructure is available to accommodate stormwater runoff. Similar to the Project, Related Projects are located on sites that are fully developed and mainly impervious. Any new development on the Related Project sites may be required to implement LID BMPs to meet the City's requirements. Implementation of the LID BMPs would, at a minimum, maintain existing runoff conditions. **Therefore, the impact of the Project combined with the Related Projects on surface water hydrology would be less than significant.**

Surface Water Quality

Future growth in the Ballona Creek Watershed would be subject to NPDES requirements relating to water quality for both construction and operation. In addition, since the Project is located in a highly urbanized area, future land use changes or development are not likely to cause substantial changes in regional surface water quality. As noted above, the Project is designed so that it would not have an adverse impact on water quality, and would in fact improve the quality of on-site flows due to the introduction of new BMPs that would collect, treat, and discharge treated flows from

the Project Site (which are not being treated under existing conditions). Also, it is anticipated that the Project and other future development projects would also be subject to LID requirements and implementation of measures to comply with TMDLs. Increases in regional controls associated with other elements of the MS4 Permit would improve regional water quality over time. **The Project combined with the Related Projects would be required to comply with all applicable laws, rules, and regulations, and therefore, cumulative impacts to surface water quality would be less than significant.**

Groundwater Hydrology

The geographic context for the cumulative impact analysis on groundwater level is the Hollywood Subbasin. The Project in conjunction with forecasted growth in the region above the Hollywood Subbasin could cumulatively increase groundwater demand. However, as noted above, no water supply wells, spreading grounds, or injection wells are located within a one-mile radius of the Project Site and the Project would not include a groundwater well that would draw from or otherwise have an adverse impact on groundwater level. Any calculation of the extent to which the Related Projects would extract or otherwise directly utilize groundwater would be speculative. **Therefore, the Project's potential impact on groundwater hydrology would not be cumulatively considerable and would be less than significant.**

Furthermore, as previously discussed, implementation of the Project would not result in a reduction in impervious surface area on the Project Site. Development of the Related Projects could result in changes in impervious surface area within their respective project sites. While any calculation of the extent to which the Related Projects would increase or decrease impervious or pervious surfaces that might affect groundwater hydrology would be speculative, the development of such Related Projects would be subject to review and approval pursuant to all applicable regulatory requirements, including any required mitigation of potential groundwater hydrology impacts. In addition, as the Related Projects are located in a highly urbanized area, any potential reduction in groundwater recharge due to the overall net change in impervious area within the area encompassed by the Related Project sites would be minimal in the context of the regional groundwater basin, and would thus not result in a significant cumulative effect to groundwater hydrology. **Therefore, cumulative impacts to groundwater hydrology would be less than significant.**

Groundwater Quality

Future growth in the Hollywood Subbasin would be subject to LARWQCB requirements relating to groundwater quality. In addition, since the Project Site is located in a highly urbanized area, future land use changes or development are not likely to cause substantial changes in regional groundwater quality. As discussed above, the Project would not have an adverse impact on groundwater quality. Also, it is anticipated that, like the Project, other future development projects would also be subject to LARWQCB requirements and, where necessary, implementation of measures to comply with TMDLs in addition to requirements of California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. **The Project's potential impacts to groundwater quality would not be cumulatively considerable and would be less than significant.**

Land Use and Planning

Compliance with City's land use standards would ensure that any cumulative impacts related to land use would be less than significant. Further, all Related Projects would be individually evaluated for consistency with applicable land use standards. None of the Related Projects would physically divide an established community or conflict with a habitat conservation plan. **The Project would not make a cumulatively considerable contribution to land use planning, and cumulative land use impacts would be less than significant.**

Mineral Resources

Development of the Project in combination with the Related Projects would not result in the loss of availability of mineral resources. The Project Site and the surrounding area are highly urbanized area and do not include any MRZ zones. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and no cumulative impacts to mineral resources would occur.**

Noise

Construction Noise

For construction noise impacts, only the immediate area surrounding a specific development site is included in the cumulative context as the immediate area would be the most affected by construction noise. Typically, if a development site is 500 feet or more away from another site then noise levels would have attenuated to a point that they would not combine to produce a cumulative noise impact. The nearest Related Projects include: No. 7, apartments located 75 feet (0.01 mile) southwest of the Project Site.

LAMC Section 41.40 regulates noise from construction activities by regulating the days and hours during which construction may occur. The construction activities associated with the Project would comply with these LAMC requirements. In addition, pursuant to LAMC Section 112.05, construction noise levels are exempt from the 75 dBA noise threshold if all technically feasible noise attenuation measures are implemented. In conformance with the requirements of LAMC Section 112.05, implementation of the aforementioned BMPs would assist in reducing the noise levels associated with construction of the Project to the maximum extent that is technically feasible. Thus, based on the provisions set forth in LAMC 112.05, implementation of the noise BMPs recommended above would ensure the Project would be consistent with the LAMC and construction noise impacts would be less than significant. **Therefore, construction noise would not combine to result in a cumulatively considerable construction noise impact.**

Operational Noise

Similar to construction noise, it is unlikely for stationary noise sources to result in a cumulatively considerable noise impact, unless Related Projects are located within the close vicinity of the Project. The nearest Related Projects include: No. 7, apartments located 75 feet (0.01 mile) southwest of the Project Site.

For operational/roadway related noise impacts, the traffic study accounted for trip generation from Related Projects which was used to model mobile noise levels. Medium- and heavy-duty type delivery trucks are anticipated to intermittently visit the site as needed; however, the number of these truck trips are not expected to be more than between 10 to 40 round trips per day and would not significantly contribute to off-site traffic noise upon roadways in the Project's vicinity. The existing traffic noise level along Virginia Avenue was calculated as 56.9 dBA CNEL.[239] If 40 delivery truck trips were to occur along Virginia Avenue, the traffic noise level generated by those medium and heavy-duty trucks would be 56.4 dBA CNEL. When the existing traffic noise level is added to the truck trip noise level, the resulting noise level is 59.7 dBA CNEL, which is an increase of 3.3 dBA CNEL, which would not exceed the 5 dBA significant noise level increase threshold stated above. Therefore, traffic noise impacts to off-site receptors due to Project generated trips would be less than significant. **Therefore, a cumulatively considerable noise impact would not occur related to operational noise.**

Construction Vibration

For construction vibration impacts, only the immediate area surrounding a specific development site is included in the cumulative context as the immediate area would be the most affected by construction noise. Typically, if a development site is 50 feet or more away from another site, vibration levels would have attenuated to a point that they would not combine to produce a cumulative vibration impact. The nearest Related Projects include: No. 7, apartments located 75 feet (0.01 mile) southwest of the Project Site. **Construction vibration levels would not combine to result in a cumulatively considerable construction vibration impact.**

Operational Vibration

Urban infill developments do not typically generate significant operational vibration levels. Related Project and Project vehicle trips could generate vibration, although similar to the existing condition, roadway vibration from passenger vehicles would not be perceptible outside of the roadway right-of-way. A significant operational vibration impact would not occur. **Therefore, operational vibration levels would not combine to result in a cumulatively considerable vibration impact.**

Population and Housing

The Related Projects would introduce additional residential and other related uses to the City of Los Angeles. Any residential Related Projects would result in direct population growth. The Related Projects growth would not exceed the projected growth because SCAG can update its projections after the 2020 Census when some of the Related Projects are in operation. The net increase of employees is not cumulatively considerable as there are no thresholds for employee impacts. **Because the Project would not displace any residents, the Project's population**

239 Calculated from a traffic volume of 1,726 ADT based on data provided for Virginia Avenue by Overland Traffic Consultants.

growth would not be cumulatively considerable. **Therefore, the Project's cumulative impacts to population and housing would be less than significant.**

Public Services

Fire

Given the geographic range of the Related Projects, they would be served by Fire Station No. 52 the same as the Project Site.[240] The Project, in combination with the Related Projects, could increase the demand for fire protection services in the Project area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the Project and Related Projects would contribute. Similar to the Project, each of the Related Projects in the City of Los Angeles would be individually subject to LAFD review and would be required to comply with all applicable fire safety requirements of the LAFD in order to adequately mitigate fire protection impacts. Specifically, any Related Projects that exceeded the applicable response distance standards described above would be required to install automatic fire sprinkler systems in order to mitigate the additional response distance. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas. Nevertheless, the development of any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. **On this basis, the Project would not make a cumulatively considerable contribution to fire protection services impacts, and as such cumulative impacts on fire protection would be less than significant.**

Police

The Project, in combination with the Related Projects, would increase the demand for police protection services in the Project area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Project and Related Projects would contribute. In addition, each of the Related Projects would be individually subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. Furthermore, each of the Related Projects would likely install and/or incorporate adequate crime prevention design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services. To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas. Nevertheless, the siting and development of any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAPD does not currently

240 City of Los Angeles Fire Department, Find Your Station Website, accessed: December 2022.

have any plans for new police stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. **On this basis, the Project would not make a cumulatively considerable contribution to police protection services impacts, and cumulative impacts on police protection would be less than significant.**

Schools

Given the geographic range of the Related Projects, they would be served by a variety of public schools depending on the location and service boundaries. The Project, in combination with the Related Projects is expected to result in a cumulative increase in the demand for school services. These Related Projects would have the potential to generate students that would attend the same schools as students associated with the Project. However, each of the Related Projects would be responsible for paying mandatory school fees to mitigate the increased demands for school services. Overall, the payment of school fees in compliance with SB 50 would provide full and complete mitigation of school impacts for the purposes of CEQA. **Therefore, the Project's school impacts would not be cumulatively considerable, and cumulative impacts on schools would be less than significant.**

Parks and Recreation

Development of the Project in conjunction with the Related Projects could result in an increase in permanent residents residing in the Project area. Additional cumulative development would contribute to lowering the City's existing parkland to population ratio, which is currently below the preferred standard. However, each of the residential Related Projects is required to comply with payment of Quimby (for condominium units) and other fees, such as the Parks and Recreation Fee (for apartment units). Each residential Related Projects would also be required to comply with the on-site open space requirements of the LAMC. **Therefore, with payment of the applicable recreation fees on a project-by-project basis, the Project would not make a cumulatively considerable impact to parks and recreational facilities and cumulative impacts would be less than significant.**

Library

Given the geographic range of the Related Projects, they would be served by the John C. Fremont Branch Library, which is located at 6121 Melrose Avenue, Los Angeles, is located approximately 1.7 miles southwest of the Project Site. The John C. Fremont Branch Library is 7,361 square feet in size and has a collection size of 36,289 resources.[241] Development of the Related Projects would likely generate additional demands upon library services. The LAPL has no plans for new or expanded libraries; however, the Related Projects, like the Project, would contribute to the City General Fund, which goes to, among other things, library services. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and impacts related to library facilities would be less than significant.**

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241 Robyn Myers, Management Analyst, Facilities & Events Management, Los Angeles Public Library, January 20, 2022.

Transportation

Conflict with Program Plans

Development of the Project in conjunction with the Related Projects would result in an increase in average daily vehicle trips and peak hour vehicle trips. Each of the Related Projects considered in this cumulative analysis of consistency with programs, plans, policies, and ordinances would be separately reviewed and approved by the City, including a check for their consistency with applicable policies. Collectively, the Project and the Related Projects add high-density development in a major commercial area with high-quality transit options and high levels of pedestrian activity. Therefore, the Project, together with the Related Projects identified in Table 4.27, would neither create inconsistencies nor result in cumulative impacts with respect to the identified programs, plans, policies, and ordinances.

Therefore, Project operation-related and cumulative-related traffic would not conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and Project transportation policy impacts would be less than significant.**

VMT Analysis

A development project would have a cumulative VMT impact if it were deemed inconsistent with 2020-2045 RTP/SCS, the regional plan to reach state air quality and greenhouse gas reduction targets. However, based on the TAG, a project that does not result in a significant VMT impact would be in alignment with the RTP/SCS and therefore, would not result in a cumulative VMT impact. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and the Project would not result in a significant cumulative VMT impact.**

Hazards Due to Geometric Design

The TAG indicates that cumulative impacts for this threshold requires a review of Related Projects with access points proposed along the same block(s) as a proposed project in order to determine the combined impact and the proposed project's contribution. None of the Related Projects identified in the Traffic Impact Assessment, and provided in Table 4.27, provide access along the same block as the Project. Thus, Related Projects and the Project would not increase hazards due to geometric design features. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and the Project and Related Projects would not result in a cumulative Geometric Design impact.**

Emergency Access

Vehicular access to all parking would be provided from new driveways. Specifically, the Project would include four two-way vehicular driveways: two located along West Virginia Avenue; one located along North Wilton Place; and one along North St. Andrews Place. In addition, the Project would provide one at-grade, drop-off roundabout driveway along North Wilton Place and a second

along North St. Andrews Place. The Project's local street access would be consistent with LADOT driveway placement and location per LADOT Manual of Policies and Procedures, Section 321, Driveway Design. One Related Project is located within 500 feet of the Project Site, however It does not have an exit on to the Project Sites streets. Thus, the Project and Related Projects would not generate vehicle trips that would threaten the ability of emergency vehicles to access land uses in the project area. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and the Project and Related Projects would not result in a cumulative emergency access impact.**

Tribal Cultural Resources

The Project and Related Projects would comply with AB 52 in which the lead agency for each project would be required to notice tribes that are traditionally and culturally affiliated with the geographic area of the Related Project sites if the tribe has submitted a written request to be notified. Due to being locally specific, each Related Project would need to conduct a Sacred Lands File search and be evaluated within its own site specific context. The Project would not adversely affect known Tribal Cultural Resources. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative impacts on cultural resources will be less than significant.**

Utilities and Service Systems

Wastewater

The Project would create additional sewer flow. However, as discussed above, BOS has conducted an analysis of existing and planned capacity as related to the Project. Similar to the Project, future projects connecting to the same sewer system are required to obtain a sewer connection permit and submit a SCAR to BOS during the design phase of the project.[242] The analysis by BOS takes into consideration previously approved SCARs as part of their review. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the Related Project and BOS to construct the necessary improvements.

In addition to the City's SCAR analysis, a Related Projects list has been generated. There are 7 Related Projects, which consist of, but are not limited to, residential, office, and retail/commercial uses. The total increase in wastewater generation for the Related Projects is approximately 2.80 million gallons per day (mgd). Combined with the Project, the increase in wastewater generation is approximately 3.16 mgd. Refer to Exhibit 4 for a breakdown of the Related Projects and associated wastewater generation.

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Treatment Plant system. As previously stated, based on information from BOS, the existing design capacity of the Hyperion Service Area is approximately

242 City of Los Angeles Bureau of Engineering, Sewer Permits https://engpermits.lacity.org/spermits/index1.cfm, accessed November 29, 2022

550 million gallons per day (mgd)[243] and the existing average daily flow for the system is approximately 300 mgd, resulting in a treatment capacity of 250 mgd.[244] The estimated wastewater generation increase of the Project would be 0.358 mgd, which represents approximately 0.143 percent of the available capacity in the system. The estimated wastewater generation increase of the Project and Related Projects combined would be 3.16 mgd, which represents approximately 1.26 percent of the available capacity in the Hyperion Service Area system. The Related Projects would also be required to adhere to the BOS's annual wastewater flow increase allotment**. Therefore, cumulative impacts on wastewater treatment capacity are less than significant.**

Water

The geographic context for the cumulative impact analysis on water infrastructure is the LADWP service area, which includes the entirety of the City. LADWP, as a public water service provider, is required to prepare and periodically update an Urban Water Management Plan (UWMP) to plan and provide for water infrastructure to serve existing and projected demands. The 2020 UWMP prepared by LADWP accounts for existing development within the City, as well as projected growth through the year 2045. Demographic projections for the LADWP service area are based on the Southern California Association of Governments' (SCAG) demographic growth forecast for their 2020 Regional Transportation Plan (RTP)[245]. LADWP adopted these demographic projections for water demand forecast in their respective UWMPs for projecting future water demand and, therefore, future water infrastructure needs.[246] The MND concludes that the Project is consistent with the SCAG 2020 RTP/SCS. Therefore, the Project is consistent with LADWP's 2020 UWMP.

In addition, there are 7 Related Projects, which consist of, but are not limited to, residential, restaurants, office, pharmacy, and retail. The total increase in water demand for the Related Projects would be approximately 2.8 million gallons per day (mgd). Combined with the Project, the increase in water demand would be approximately 3.24 mgd. Refer to Exhibit 4 for a breakdown of the Related Projects and associated water consumption. The 2020 UWMP has estimated a water demand of 475 mgd in the City of Los Angeles by the year 2025, which means the Project combined with the Related Projects would account for approximately 0.68 percent of the total daily demand.

243 City of Los Angeles Department of Public Works, Bureau of Sanitation, Water Reclamation Plants, https://www.lacitysan.org/san/faces/home/portal, accessed November 8, 2022.

244 City of Los Angeles Department of Public Works, LA Sanitation, Sewer System Management Plan, Hyperion Sanitary Sewer System, January 2019.

245 "Los Angeles Department of Water and Power Urban Water Management Plan." *Water*, LADWP, https://www.ladwp.com/cs/groups/ladwp/documents/pdf/mdaw/nzyy/~edisp/opladwpccb762836.pdf, accessed November 29, 2022.

246 "Los Angeles Department of Water and Power Urban Water Management Plan." *Water*, LADWP, https://www.ladwp.com/cs/groups/ladwp/documents/pdf/mdaw/nzyy/~edisp/opladwpccb762836.pdf. P. ES-6, accessed November 29, 2022.

Based on the above, it is anticipated that LADWP would have adequate infrastructure to accommodate the Project as well as Related Projects. **Therefore, impacts on water infrastructure capacity would be less than significant.**

Wildfire

Only one Related Project is located within 500 feet of the Project Site, however they do not share access to West Virginia Avenue, North Wilton Place, or North St. Andrews Place. If lane closures are necessary to local streets adjacent to Related Project sites, travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate emergency access and circulation. Regarding operations, the Related Projects, like the Project, would comply with access requirements from the LAFD and would not impede emergency access within the vicinity of each Related Project site. Therefore, the Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan. **Cumulative impacts related to the implementation of the City's emergency response plan would be less than significant**.

All of the Related Project Sites and the Project Site are within urbanized areas of the City and do not include wildlands or fire hazard terrain or vegetation. Therefore, the Project and Related would not exacerbate wildfire risks and no exposure of Project occupants to pollutant concentrations from a wildfire would occur. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and no cumulative wildfire impact would occur.**

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

Less Than Significant With Mitigation Incorporated. A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Project would not have significant environmental effects on human beings, either directly or indirectly after mitigation. Mitigation is required to reduce, construction noise/vibration (**MM NOI-1**), and to monitor Tribal Cultural Resources (**MM TCR-1**). Thus, with mitigation, any potentially significant impacts to humans would be less than significant.

INITIAL STUDY

5.0 MITIGATION AND MONITORING PROGRAM

5.1 INTRODUCTION

This Mitigation Monitoring Program ("MMP") has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a "reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." In addition, Section 15097(a) of the state CEQA Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6 and Section 15097 of the state CEQA Guidelines.

The City of Los Angeles is the Lead Agency for the Project and therefore is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation; however, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

A Mitigated Negative Declaration (IS/MND) has been prepared for the Project that evaluates the Project's potential impacts, taking into consideration the Project Design Features (PDF) and mitigation measures (MM) the Applicant has agreed to incorporate into the Project to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor implementation of the PDFs and MMs incorporated into the Project.

5.2 ORGANIZATION

As shown on the following pages, each identified Project Design Feature and mitigation measure for the Project is listed and categorized by environmental impact area, with accompanying identification of the following:

- Enforcement Agency: the agency with the power to enforce the PDF or MM.
- Monitoring Agency: the agency to which reports involving feasibility, compliance, implementation, and development are made.
- Monitoring Phase: the phase of the Project during which the PDF or MM shall be monitored.
- Monitoring Frequency : the frequency at which the PDF or MM shall be monitored.

- Action Indicating Compliance: the action by which the Enforcement or Monitoring Agency indicates that compliance with the identified PDF or required MM has been implemented.

5.3 ADMINISTRATIVE PROCEDURES AND ENFORCEMENT

This MMP shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each PDF and MM and shall be obligated to provide certification, as identified below, to the appropriate monitoring and enforcement agencies that each PDF and MM has been implemented. The Applicant shall maintain records demonstrating compliance with each PDF and MM. Such records shall be made available to the City upon request.

During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of PDFs and MMs during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

The Construction Monitor shall also prepare documentation of the Applicant's compliance with the PDFs and MMs during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the MMs and PDFs within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

5.4 PROGRAM MODIFICATION

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made subject to City approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The Project shall be in substantial conformance with the PDFs and MMs contained in this MMP. The enforcing departments or agencies may determine substantial conformance with PDFs and MMs in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF or MM may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of the PDFs or MMs. Any addendum or subsequent CEQA clearance shall explain why the PDF or MM is no longer needed, not feasible, or the other basis for modifying or deleting the PDF or

MM, and that the modification will not result in a new significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a PDF or MM shall not, in and of itself, require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the PDF or MM results in a substantial change to the Project or the non-environmental conditions of approval.

5.5 MITIGATION MONITORING PROGRAM

Police

Project Design Features

PDF POL-1: During construction, the Project will implement appropriate temporary security measures including security fencing (e.g., chain-link fencing), low-level security lighting and locked entry (e.g., padlock gates or guard restricted access) to limit access by the general public. Regular and multiple security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) will also be provided. During construction activities, the Contractor will document the security measures; and the documentation will be made available to the Construction Monitor.

- **Enforcement Agency:** Los Angeles Police Department
- **Monitoring Agency:** Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Construction
- **Action Indicating Compliance:** Field Inspection sign-off

PDF POL-2: The Project will provide an extensive 24-hours-a-day/7-day-a-week security program during Project operations to ensure the safety of employees and other visitors to the Project Site. The Project will incorporate strategies in design and planning, as well as active security features. On-site security measures during Project operation will include:

- Provision of on-site security personnel whose duties will include but not be limited to the following:
    - Monitoring entrances and exits;
    - Patrolling the perimeter of the property;
    - Controlling and monitoring activities in the public spaces;
    - Managing and monitoring fire/life/safety systems; and
    - Controlling and monitoring activities in the parking facilities.

- Installation of industry standard security lighting at recommended locations including parking areas, pathways, and curbside drop-off areas;
- Installation of closed-circuit security cameras at select locations including (but not limited to) entry and exit points, lobby areas, outdoor open spaces, and parking areas;
- Provision of adequate lighting of parking areas, elevators, and lobbies to reduce areas of concealment;
- Provision of lighting of building entries and open spaces to provide pedestrian orientation and to clearly identify a secure route between the parking areas and access points; and
- Prominent posting of contact information for on-site security staff throughout the Project Site.
- **Enforcement Agency:** Los Angeles Police Department
- **Monitoring Agency:** Los Angeles Police Department
- **Monitoring Phase:** Operation
- **Monitoring Frequency:** Operation
- **Action Indicating Compliance:** Field Inspection sign-off

PDF POL-3: Prior to the issuance of a building permit, the Project Applicant or its successor will consult with LAPD's Crime Prevention Unit regarding the incorporation of any additional crime prevention features appropriate for the design of the Project.

- **Enforcement Agency:** Los Angeles Police Department
- **Monitoring Agency:** Los Angeles Police Department
- **Monitoring Phase:** Operation
- **Monitoring Frequency:** Operation
- **Action Indicating Compliance:** Field Inspection sign-off

PDF POL-4: Upon completion of Project construction and prior to the issuance of a certificate of occupancy, the Applicant will submit a diagram of the Project Site to LAPD's Hollywood Division Commanding Officer that includes access routes and any additional information that might facilitate police response.

- **Enforcement Agency:** Los Angeles Police Department
- **Monitoring Agency:** Los Angeles Police Department
- **Monitoring Phase:** Operation
- **Monitoring Frequency:** Operation
- **Action Indicating Compliance:** Field Inspection sign-off

Noise

Project Design Features

PDF NOI-1:

- Use of noise control devices, such as equipment mufflers, enclosures, and barriers. Natural and artificial barriers such as ground elevation changes and existing buildings can shield construction noise. Stage construction operations as far from noise sensitive uses as possible;
- Avoid residential areas when planning haul truck routes and locate the haul truck staging/ingress/egress area as far away from noise sensitive uses as possible;
- Maintain all sound-reducing devices and restrictions throughout the construction period;
- Replace noisy equipment with quieter equipment (for example, rubber-tired equipment rather than track equipment); and
- Change the timing and/or sequence of the noisiest construction operations to avoid sensitive times of the day.

    - **Enforcement Agency:** Department of Building and Safety
    - **Monitoring Agency:** Department of Building and Safety
    - **Monitoring Phase:** Construction
    - **Monitoring Frequency:** Construction
    - **Action Indicating Compliance:** Field Inspection sign-off

PDF NOI-2: The construction contractor shall construct at least a 0.5 inch plywood noise barrier surrounding a truck-sized opening in the noise barrier along Virginia Avenue, near St Andrews Place. This plywood noise barrier shall block the line-of-sight from the closest sensitive receptors on the northern side of Virginia Avenue to the haul trucks entering and exiting the Project Site at this location. The construction contractor shall limit the number of haul trucks utilizing the Virginia Avenue access to the Project Site and require that the majority of haul truck activity access the Project Site from a location on the southern portion of St Andrews Place, at a distance of approximately 104 feet from the building façade of the closest sensitive receptor (located on the northwestern corner of Virginia Avenue and St Andrews Place).

- **Enforcement Agency:** Department of Building and Safety
- **Monitoring Agency:** Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Construction
- **Action Indicating Compliance:** Field Inspection sign-off

Mitigation Measures

MM NOI-1: The construction contractor shall not use large bulldozer or caisson drill within 80 feet of the façade of the residential uses located west, north and south of the Project Site nor shall the construction contractor use a vibratory roller within 136 feet of the residential uses located north of the Project Site.

- **Enforcement Agency:** Department of Building and Safety
- **Monitoring Agency:** Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Construction
- **Action Indicating Compliance:** Field Inspection sign-off

Traffic

Project Design Features

PDF TR-1: **Transportation Demand Management Program**. A preliminary TDM program shall be prepared and provided for DOT review prior to the issuance of the first building permit for this project and a final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the Project. The TDM program shall include, but shall not be limited to, the following strategies:

- Reduced Parking Supply – This strategy changes the Project's parking supply to provide less than the amount of vehicle parking required by direct application of the LAMC requirements without consideration of parking reduction permitted in the code. Per direct application of the LAMC for the Project would be required to provide 1,012 parking spaces. The Project will apply reductions through replacement of each vehicle space with 4 bicycle spaces for a total of 981 vehicle parking spaces.

- Bicycle Infrastructure – Include Bike Parking per LAMC - This strategy involves implementation of short and long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations under existing LAMC regulations applicable to the Project. The Project is required to, and will provide, a minimum of 162 bicycle parking spaces.

- Bicycle Infrastructure – Include Bike Parking and Showers - This strategy involves implementation of additional end of trip bicycle facilities to support safe and comfortable bicycle travel by providing amenities at the Project. This Project will provide up to 10 showers and 162 secure lockers.

  - **Enforcement Agency:** Department of Building and Safety
  - **Monitoring Agency:** Department of Building and Safety
  - **Monitoring Phase:** During Project Design and Prior to Construction
  - **Monitoring Frequency:** Review of Plans
  - **Action Indicating Compliance:** Department of Building and Safety sign-off

PDF TR-2: Prior to the issuance of a building permit for the Project, a detailed Construction Staging and Traffic Management Plan (CSTMP) would be submitted to LADOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work. The plan would show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. The CSTMP would formalize how construction would be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CSTMP will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site. Construction management meetings with City Staff and other surrounding construction Related Project representatives (i.e., construction contractors) whose projects will potentially be under construction at around the same time as the Project shall be conducted bimonthly, or as otherwise determined appropriate by City Staff. This coordination will ensure construction activities of the concurrent Related Projects and associated hauling activities are managed in collaboration with one another and the Project. LADOT also recommends that all construction related truck traffic be restricted to off-peak hours. The CSTMP would include, but not be limited to, the following elements as appropriate:

- Emergency access shall be maintained to the Project Site during construction through marked emergency access points approved by the Los Angeles Fire Department (LAFD).
- Construction worker parking on nearby residential streets shall be prohibited.
- Worker parking shall be provided on-site or in designated off-site public parking areas.
- Temporary traffic control during all construction activities adjacent to public rights-of-way shall be provided to improve traffic flow on public roadways (e.g., flag men).
- Construction-related deliveries, haul trips, etc., shall be scheduled so as to occur outside the commuter peak hours to the extent feasible, to reduce the effect on traffic flow on surrounding streets.
- Construction-related vehicles shall be prohibited from parking on surrounding public streets.
- Safety precautions for pedestrians and bicyclists shall be obtained through such measures as alternate routing and protection barriers as appropriate, especially as it pertains to maintaining safe routes to schools, particularly Metropolitan High School.

- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.

- Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

- In the event of a lane or sidewalk closure, traffic and/or pedestrians shall be routed around any such lane or sidewalk closures.

- The locations of the off-site truck staging shall be identified to include, staging in a legal area, and which would detail measures to ensure that trucks use the specified haul route, and do not travel through nearby residential neighborhoods.

- There would be coordination with nearby projects, that have potential overlapping construction timeframes, to schedule vehicle movements to ensure that there are no vehicles waiting off-site and impeding public traffic flow on the surrounding streets.

    - **Enforcement Agency:** Department of Building and Safety
    - **Monitoring Agency:** Department of Building and Safety
    - **Monitoring Phase:** During Project Design and Prior to Construction
    - **Monitoring Frequency:** Review of Plans
    - **Action Indicating Compliance:** LADOT sign-off

Tribal Cultural Resources

Mitigation Measure

MM TRC-1: In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall assess the find. Work on the portions of the Project outside of the buffered area may continue during this assessment period. The Fernandeño Tataviam Band of Mission Indians (FTBMI) shall be contacted regarding any pre-contact and/or post-contact finds and be provided information after the archaeologist makes their initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant in accordance with applicable law, the Project applicant shall retain a professional Native American monitor procured by the FTBMI to observe all remaining ground-disturbing activities including, but not limited to, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, clearing, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work. The Lead Agency and/or applicant shall, in good faith, consult with the FTBMI on the disposition and

treatment of any Tribal Cultural Resource encountered during all ground disturbing activities pursuant to the process set forth below.

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed Project, and (2) Department of City Planning, Office of Historic Resources (OHR).

2. If OHR determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

3. The Applicant, or its successor, shall implement the tribe's recommendations if a qualified archaeologist retained by the City and paid for by the Applicant, or its successor, in consultation with the tribal monitor, reasonably conclude that the tribe's recommendations are reasonable and feasible.

4. In addition to any recommendations from the applicable tribe(s), a qualified archeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.

5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or qualified tribal monitor, the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the archaeologist or tribal monitor; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate an

significant impacts to tribal cultural resources. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.

6. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.

7. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in Items 2 through 5 above.

8. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the SCCIC at California state University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.

9. Notwithstanding Item 8 above, any information that the Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.

    - **Enforcement Agency:** Department of Building and Safety
    - **Monitoring Agency:** Tribal Monitor
    - **Monitoring Phase:** Prior to Construction and Construction
    - **Monitoring Frequency:** Prior to Construction and Construction
    - **Action Indicating Compliance:** Department of Building and Safety sign-off

INITIAL STUDY

6.0 PREPARERS AND PERSONS CONSULTED

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Department of City Planning
Oliver Netburn, City Planner

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PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT

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INITIAL STUDY

7.0 ABBREVIATIONS & ACRONYMS

AB	Assembly Bill
ACM	Asbestos Containing Materials
AOC	Areas of Concern
APN	Assessor Parcel Number
AQMP	Air Quality Management Plan
Basin	South Coast Air Basin
BMPs	Best Management Practices
BOE	Bureau of Engineering
BPW	Board of Public Works
CA FID	California Facility Inventory Database
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CiSWMPP	City of Los Angeles Solid Waste Management Policy Plan
City	City of Los Angeles, California
CIWQS	California Integrated Water Quality System
CNEL	Community Noise Exposure
ColWMP	Los Angeles County Integrated Waste Management Plan
CREC	Controlled Recognized Environmental Conditions
CUGU	Clean Up-Green Up
CY	Cubic Yards
DTSC	Department of Toxic Substances Control's
DWP	City of Los Angeles Department of Water and Power
ECHO	Enforcement and Compliance History Information

EDR	Environmental Data Resources
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
ETK	Transitional Kindergarten
EV	All Electric Vehicles
EWMP	Enhanced Watershed Management Programs
FAR	Floor-to-area ratio
FEMA	Federal Emergency Management Agency
FINDS	Facility Index System/Facility Registry System
GHG	Greenhouse gas(es)
GPR	Ground-Penetrating Radar
HAZMAT	Hazardous Materials Reporting Facility
HAZNET	Facility and Manifest Data
HIST	Historic
HREC	Historical Recognized Environmental Conditions
HVAC	Heating, Ventilation and Air Conditioning
HWTS	Hazardous Waste Tracking System
LBP	Lead Based Paint
LADBS	Los Angeles Department of Building and Safety
LADOT	City of Los Angeles Department of Transportation
LADRP	City of Los Angeles Department of Recreation and Parks
LADWP	City of Los Angeles Department of Water and Power
LAFD	City of Los Angeles Fire Department
LAGBC	Los Angeles Green Building Code
LAMC	Los Angeles Municipal Code
LAPD	City of Los Angeles Police Department
LAPL	City of Los Angeles Public Library
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District

LID	Low Impact Development
MWELO	Model Water Efficient Landscape Ordinance
MPOs	California Metropolitan Planning Organizations
MRZ	Mineral Resource Zone
NAAQS	National Ambient Air Quality Standards
NPDES	National Pollution Discharge Elimination System
NOP	Notice of Preparation
O & M	Operations and Maintenance
$PM_{2.5}$	Fine Particulate Matter
PM_{10}	Particulate Matter
PRC	Public Resource Code
PSF	Pounds per Square Foot of Pressure
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Conditions
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SIP	state Implementation Plan
Siting Element	Countywide Siting Element
SQG	Small Quantity Hazardous Waste Generator
SRRE	City of Los Angeles Source Reduction and Recycling Element
STLC	Soluble Threshold Limit Concentration
SUSMP	Standard Urban Stormwater Mitigation Plan
SWEEPS	Statewide Environmental Evaluation and Planning System
SWPPP	Stormwater Pollution Prevention Program
SWIRP	Solid Waste Integrated Resources Plan
SWRCB	state Water Resources Control Board
TMDL	Total Maximum Daily Load

TPA	Transit Priority Area
TPH	Total Petroleum Hydrocarbons
USFWS	U.S. Fish and Wildlife Service
UST	Underground Storage Tank
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
VRF	Variable Refrigerant Flow
WSA	Water Supply Assessment
ZI	Zoning Information