

VI. Other CEQA Considerations

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1. Significant Unavoidable Impacts

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2 (b) states:

Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

As evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, and summarized below, implementation of the Project would result in significant impacts that cannot be mitigated with respect to regional air quality during construction, impacts to an individual historical resource, on-site and off-site construction noise, and vibration from on-site construction (human annoyance). Furthermore, as evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, the following cumulative impacts would be significant and unavoidable: regional air quality impacts during construction and off-site construction noise.

a. Air Quality

As discussed in Section IV.B, Air Quality, of this Draft EIR, the Project would exceed the South Coast Air Quality Management District (SCAQMD) regional significance thresholds for nitrogen oxides (NO_x) during peak periods of construction (approximately 156 days over the five year construction duration) as well as during concurrent construction and operational activities. Implementation of all feasible mitigation measures would reduce, but not eliminate, these impacts. As such, Project construction and concurrent construction and operation would result in significant and unavoidable short-term impacts with regard to regional NO_x emissions.

According to the SCAQMD, individual construction projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin

is in non-attainment. As discussed above, construction-related daily emissions at the Project Site would exceed the SCAQMD's regional significance threshold for NO_x during certain periods of construction and during concurrent construction and operational activities. Consequently, the Project would have a cumulative impact due to construction- and concurrent construction and operations-related regional NO_x emissions, and such impact would also be significant and unavoidable.

b. Cultural Resources

As discussed in Section IV.C, Cultural Resources, of this Draft EIR, the Project would remove the United Recording Building at 6050 Sunset Boulevard which is eligible for listing in the National Register, California Register, and as a Los Angeles Historic-Cultural Monument. Due to the removal of the 6050 Sunset Boulevard, the Project would cause a substantial adverse change in the significance of an historical resource. Mitigation measures would be implemented. However, impacts to historical resources would be significant and unavoidable.

c. Noise

As discussed in Section IV.H, Noise, of this Draft EIR, the estimated on-site noise levels during all phases of Project construction would be below the significance threshold at off-site receptor locations R3, R4, and R5. The estimated construction-related noise at receptors R1 and R2 would exceed the significance threshold prior to implementation of mitigation measures by 17.5 dBA and 11.8 dBA during Phase 1, respectively. The estimated construction-related noise at receptor R1 would exceed the significance threshold prior to implementation of mitigation measures by 6.0 dBA during Phase 2 construction. In addition, during potential overlapping construction activities, the estimated overlapping construction-related noise at receptors R3 through R5 would be below the significance threshold. However, the overlapping construction activities would exceed the significance threshold at receptors R1 and R2 by 13.9 dBA and 7.5 dBA, respectively. Implementation of Mitigation Measure NOI-MM-1 (installation of temporary sound barrier) would reduce the noise generated by on-site construction activities at the off-site sensitive uses by a minimum 15 dBA at the residential use on Gordon Street east of the Project Site (receptor location R1) and by a minimum 12 dBA at the residential use on Fountain Avenue south of the Project Site (receptor location R2). The estimated construction-related noise levels at off-site sensitive receptor location R2 would be reduced to below a level of significance with implementation of Mitigation Measure NOI-MM-1. With the implementation of Mitigation Measure NOI-MM-1, the construction-related noise at receptor location R1 would still exceed the significance threshold by 2.5 dBA. Therefore, construction noise impacts associated with on-site noise sources would be significant and unavoidable.

As discussed in Section IV.H, Noise, of this Draft EIR, project and cumulative noise impacts associated with off-site construction trucks from the Project (project level) could occur along the haul routes. Conventional mitigation measures, such as providing temporary noise barrier walls to reduce the off-site construction truck traffic noise impacts, would not be feasible as the barriers would obstruct the access and visibility to the properties along the anticipated haul routes. There are no other feasible mitigation measures to reduce the temporary significant noise impacts associated with both project level and cumulative off-site construction trucks. Therefore, Project level and cumulative construction truck-related noise impacts would be significant and unavoidable.

As discussed in Section IV.H, Noise, of this Draft EIR, Project-level vibration impacts from on-site construction activities would exceed the 72 VdB significance criteria for human annoyance at the residential use east and south of the Project Site (receptor locations R1 and R2), and no feasible mitigation is available to avoid this impact. Therefore, Project on-site construction vibration impacts with respect to human annoyance would be significant and unavoidable.

2. Reasons Why the Project is Being Proposed, Notwithstanding Significant Unavoidable Impacts

In addition to identification of a project's significant unavoidable impacts, Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe the reasons why a project is being proposed, notwithstanding the effects of the identified significant and unavoidable impacts. The reasons why the Project has been proposed are grounded in the underlying purpose of the Project and the Project's basic objectives, both identified in Section II, Project Description, of this Draft EIR. The underlying purpose of the Project is to provide television, video, and motion picture production facilities, while supporting the evolving needs of the entertainment industry for office space, enhanced post-production facilities, and other studio-related facilities. The basic objectives of the Project are as follows:

- Consistent with the Hollywood Community Plan to further the development of Hollywood as a major center of entertainment and to perpetuate its image as the international center of the motion picture industry, substantially augmenting the existing studio/media-related office and office production uses within an existing studio campus to ensure continued viability of the studios.
- In support of the Hollywood Community Plan to promote economic well-being and public convenience through encouraging the revitalization of the motion picture industry; and creating a secure campus environment where media and entertainment related uses are consolidated with production, post-production, and administrative offices in order to maximize creativity and productivity.

- Consistent with the General Plan to maintain significant historic and architectural districts while allowing for the development of economically viable uses, establishing clear guidelines for the preservation of the historic character of the Project Site while providing upgraded office space and production-supporting uses on the Project Site in a manner that respects and preserves the majority of identified historic districts.
- Augment, expand, and diversify an existing studio site along a transit corridor within a high activity area where media and entertainment related uses are consolidated with production, post-production, and administrative offices within a single site to promote sustainability and reduce vehicle miles traveled, with associated reductions in air quality and greenhouse gas emissions.
- Design and construct economically-viable and technologically advanced creative office and production support spaces with the integrated density, infrastructure, parking, and technology to attract high-quality media and creative office tenants along a key corridor in Hollywood and to meet the existing and anticipated future demand of the movie, television, and entertainment industry and to allow flexibility to incorporate future technology advances.
- Provide an enhanced studio campus environment that creates new media-related employment opportunities serving movie, television, and entertainment industries, as well as construction jobs, providing opportunities for local and regional economic growth as well as locating jobs on a site that is easily accessible via public transportation.
- Enhance the identity of the Project Site as a movie, television, and entertainment industry area and enhance the visual appearance of the Project Site by providing architecturally distinct development.
- Provide adequate and safe circulation, staging, and parking that satisfies the unique demand of the film production industry with direct access to the proposed uses, adequate truck and trailer circulation, and maintenance of the production “basecamp” to allow for the flexible and efficient staging of trucks and trailers needed for film and television productions, and to enhance efficiency and safety.

The underlying purpose and objectives of the Project are closely tied to the goals, objectives, and policies set forth in the Hollywood Community Plan (Community Plan). In addition, the Project would support the objectives and policies of the General Plan Framework, Redevelopment Plan, SCAG’s 2016-2040 Regional Transportation Plan/Sustainability Communities Strategy (2016-2040 RTP/SCS).

As discussed in detail in Section IV.G, Land Use and Planning, of this Draft EIR, the Project would support the objective of the Community Plan to make provision for a circulation system coordinated with land uses and densities that are adequate to

accommodate traffic. The Project would be served by the existing transportation infrastructure and would result in less than significant transportation impacts. Specifically, several bus stops are located along Sunset Boulevard and Gower Street, including Metro bus line 2, DASH Hollywood, and DASH Hollywood/Wilshire. In addition, the Metro Hollywood/Vine Station is located less than 0.5 mile northwest of the Project Site. The Project would also promote the Community Plan's objective to occupy industrial uses with the types of industries which are indigenous to Hollywood, such as motion picture and television production, radio studios, sound and recording studios, film processing studios, and motion picture equipment manufacturing and distribution. The Project Site is located along a portion of Sunset Boulevard that is highly urbanized with a high concentration of entertainment industry uses. In addition, the Project is designed to meet the evolving needs of the entertainment industry, which has been vital to the character, economic health, and social identity of Hollywood. As such, the Project would be consistent with the site's land use designation and would help to retain industries historically operated in Hollywood.

As discussed in detail in Section IV.G, Land Use and Planning, of this Draft EIR, the Project would also support the goals established in the General Plan Framework's Land Use Chapter. For example, the Project would support the General Plan Framework Element Land Use Chapter as the Project would accommodate new development within the existing Sunset Gower Studios in accordance with land use and density provisions of the General Plan Framework. Specifically, the proposed studio-related creative office and production office/production support uses would be consistent with existing land use provisions and would be within the maximum permitted floor area ratio of 1.5:1. The Project would also provide for a development that reduces vehicle trips, vehicle miles traveled, and air pollution by constructing compatible uses within walking distance of numerous transit facilities, and in a community that would complement the established skill set of the local area's employment base. The Project's location and mix of uses would reduce the need for employees to travel greater distances for employment opportunities. In addition, the Project Site is located in proximity to several transit options, which would facilitate use of other modes of transportation and reduce private vehicle trips.

In addition, as further discussed in Section IV.G, Land Use and Planning, of this Draft EIR, the Project would support other General Plan Framework goals, policies and objectives, such as:

- (1) The objective of the Urban Form and Neighborhood Design Chapter to encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region by expanding upon the existing entertainment-related uses in Hollywood.

- (2) The objective of the Economic Development Chapter to establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents and sustains economic growth by constructing studio-related office and production support space that expand upon the existing entertainment-related uses in Hollywood. The proposed uses would be constructed within the existing Sunset Gower Studios, a site traditionally occupied by studio-related uses, thus increasing the production capacity of the studios and sustaining economic growth. In addition, the proposed uses would complement the established skill set of the local area's employment base.
- (3) The policy of the Transportation Chapter/Mobility Plan 2035 to design detour facilities to provide safe passage for all modes of travel during construction through the implementation of a Construction Management Plan, as set forth in Project Design Feature TR-PDF-1, that would provide temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to Sunset Boulevard and Gordon Street. The Project would promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs through the development of additional studio/media/entertainment-related office and production support space on a site traditionally occupied by studio-related uses. The proposed uses would complement the established skill set of the local area's employment base, thus reducing the need for such employees to travel greater distances for employment opportunities. The Project would also support the City's policy to provide convenient and secure bicycle parking facilities by including a 1,450-square-foot bicycle parking facility with 182 long-term bicycle parking spaces, restrooms, and showers. Furthermore, the Project would encourage greater utilization of TDM strategies to reduce dependency on single-occupancy vehicles, consistent with the City's policy, by implementing a TDM Program that would identify measures to reduce peak-hour vehicular traffic to and from the Project Site.
- (4) The objective of the Infrastructure and Public Services Chapter to pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality by maintaining the existing percentage of impervious surfaces within the Project Site, which would not create new potential for runoff water to exceed the capacity of existing stormwater drainage systems. In addition, with the addition of landscaping, which would serve to retain stormwater runoff, post-development runoff flows would decrease from 44.27 cubic feet per second (cfs) to 43.75 cfs during a 50-year storm event. The Project would also implement Best Management Practices (BMPs) to filter, treat, and reduce stormwater pollutants prior to discharge from the Project Site in accordance with City Low Impact Development (LID) requirements. In accordance with the City's objective to ensure adequate water supplies, storage, and delivery systems, through preparation of the Water Supply Assessment for the Project, the

LADWP has found that it would be able to meet the water demand of the Project as well as the existing and planned future water demands of its service area. Also, the Project would not exceed the available capacity of water infrastructure that would serve the Project Site.

As discussed in Section IV.G, Land Use and Planning, of this Draft EIR, the Project would support the goals of the Hollywood Redevelopment Plan, such as:

- The goal of the Redevelopment Plan to promote a balanced community meeting the needs of residential, commercial, industrial, and arts and entertainment sectors by expanding upon the existing entertainment-related uses in the Hollywood area within the confines of the existing studio lot.
- The goal of the Redevelopment Plan to 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 by featuring internal pedestrian pathways as well as through the provision of 1,335 new parking spaces. In addition, the Project Site is well served by existing transit and transportation corridors.

As indicated in Section IV.G, Land Use and Planning, of this Draft EIR, the Project would also be generally consistent with the applicable goals and principles set forth in the 2016-2040 RTP/SCS. As described therein, the Project would support the goals of the 2016–2040 RTP/SCS to maximize the productivity of the region’s transportation system as well as protect the environment and health of the region’s residents by improving air quality and encouraging active transportation (e.g., bicycling and walking). The Project would be developed within an existing urbanized area that includes 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 mass transit options, including a number of bus lines. The availability and accessibility of public transit in the vicinity of the Project Site is documented by the Project Site’s location within a designated SCAG High-Quality Transit Area and City of Los Angeles Transit Priority Area, as defined in the City’s Zoning Information File No. 2452. In addition, the Project would provide bicycle parking spaces for the proposed uses that would promote the use of bicycles for trips to and from the studio lot. The Project would also include adequate parking to serve the proposed uses and would provide electric vehicle charging stations. In addition, a Transportation Demand Management program is also proposed as part of the Project that would include strategies to promote non-automobile travel and reduce the use of single-occupant vehicle trips, thereby facilitating a reduction in vehicle miles traveled and improved air quality to contribute to the protection of the environment and the health of the community’s residents.

Based on the above, the Project reflects a development that would be consistent with the City and SGAG land use plans that address future development. These benefits of the Project, as outlined above, would outweigh the effects of the significant and unavoidable impacts of the Project.

3. Significant Irreversible Environmental Changes

Section 15126.2(c) of the CEQA Guidelines indicates that an EIR should evaluate significant irreversible environmental changes that would be caused by implementation of a proposed project. As stated in CEQA Guidelines Section 15126.2(c), “[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

The Project would necessarily consume a limited amount of slowly renewable and non-renewable resources that could result in irreversible environmental changes. This consumption would occur during construction of the Project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that would include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation. As demonstrated below, the Project would not result in the commitment of large quantities of natural resources that would result in significant irreversible environmental changes.

a. Building Materials and Solid Waste

Construction of the Project would require consumption of resources that do not replenish themselves or which may renew so slowly as to be considered non-renewable. These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), and petrochemical construction materials (e.g., plastics).

Project solid waste impacts are discussed in Sections XVIII.f and g, Utilities and Service Systems – Solid Waste, of the Initial Study included as Appendix A of this Draft EIR. As indicated therein, pursuant to the requirements of Senate Bill 1379, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. In addition,

pursuant to the requirements of AB 341, the Project would adopt recycling practices during operation and the Project would provide for organic waste recycling in accordance with AB 1826. The Project would also comply with the City's Space Allocation Ordinance requiring development projects to include an on-site recycling area or room and provide clearly marked source-sorting receptacles to facilitate recycling to comply with State diversion requirements (e.g., AB 939, AB 341, and AB 1826). Thus, the consumption of non-renewable building materials such as lumber, aggregate materials, and plastics would be reduced in accordance with applicable regulations so as not to result in the inefficient or wasteful use of building materials and minimize solid waste generation.

b. Water

Consumption of water during construction and operation of the Project is addressed in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. As evaluated therein, construction activities for the Project would result in a temporary demand for water associated with dust control, equipment and site cleanup, excavation and export, soil compaction and earthwork, mixing and placement of concrete, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. These activities would occur incrementally throughout construction of the Project (from the start of construction to Project buildout). The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. As discussed in the Utility Report included in Appendix L of this Draft EIR, a conservative estimate of construction-related water use would range from 1,000 gallons per day to 2,000 gallons per day (gpd). This estimate would be less than the estimated existing water consumption of the uses to be removed of 16,115 gpd. Furthermore, as concluded in LADWP's 2015 Urban Water Management Plan (UWMP), projected water demand for the City would be met by the available supplies during all hydrologic conditions (average year, single-dry year, and multiple-dry year) in each year from 2020 through 2040. Construction of the Project would be complete by 2028. Therefore, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of Project construction.

During operation, the estimated water demand for the Project would not exceed the available supplies projected by LADWP. Development of the Project would result in an increase in long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. Specifically, it is estimated by the Water Supply Assessment (WSA) prepared for the Project that the Project would result in a net average daily water demand of 83,509 gpd, or approximately 93.56 acre-feet per year, including water savings as required by the LAMC and additional water saving features as set forth in Project Design Feature WAT-PDF-1. As provided in the WSA for the Project, LADWP concluded that the projected water supplies for normal, single-dry, and multiple-dry years

reported in LADWP's 2015 UWMP would be sufficient to meet the Project's estimated water demand, in addition to the existing and planned future water demands within LADWP's service area through the year 2040, through a combination of water conservation and water recycling. Therefore, with respect to water supply during operation, the impacts would be less than significant.

Thus, as evaluated in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, while Project construction and operation would result in some irreversible consumption of water, the Project would not utilize water in an inefficient or wasteful manner or result in a significant impact related to water supply.

c. Energy Consumption

During ongoing operation of the Project, non-renewable fossil fuels would represent the primary energy source, and thus the existing finite supplies of these resources would be incrementally reduced. Fossil fuels, such as diesel, gasoline, and oil, would also be consumed in the use of construction vehicles and equipment. As discussed in Section IV.L.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR, construction activities for the Project would not require the consumption of natural gas but would require the use of electricity and fossil fuels. The consumption of electricity and fossil fuels would occur on a temporary basis during construction, and Project construction activities would comply with all applicable emergency conservation requirements (such as Title 24 controls on construction lighting if this lighting is to last longer than 120 days). In addition, the Applicant would implement Project Design Feature AIR-PDF-1, which would require power poles and/or solar powered generators to be used during construction where power poles are available rather than temporary diesel or gasoline generators. Therefore, energy consumption during construction would not occur in an inefficient or wasteful manner and would be less than significant.

During operation, the Project's increase in electricity and natural gas demand would be within the anticipated service capabilities of LADWP and the Southern California Gas Company, respectively. As discussed in Sections IV.D, Energy and IV.F, Greenhouse Gas Emissions, of this Draft EIR, the Project would comply with all applicable state and local regulatory requirements, such as the provisions set forth in the City's Green Building Ordinance. As an example, the Project would comply with the City's EV charging requirements which specifies that 10 percent of new parking spaces would require EV charging equipment. In addition, 30 percent of all new parking spaces would be required to be EV "ready" which will be capable of supporting future EV charging equipment. In addition, the Project would implement various project design features to reduce electricity and natural gas consumption. In addition, Project Design Feature GHG-PDF-1 which would require that the design of new buildings include features so as to exceed Title 24 energy conservation requirements, be capable of meeting the standards of LEED Silver or

equivalent green building standards under LEED v4 as well as use of Energy Star-labeled appliances, a reduction of indoor water use by at least 20 percent, use of plumbing fixtures and fitting that exceed the performance requirements specified in the LAMC, and use of a weather-based irrigation system and water efficient landscaping with use of drought tolerant plants in up to 60 percent of the proposed landscaping. Furthermore, Project Design Feature WAT-PDF-1 states that the Project would incorporate several design features to support water conservation features in excess of LAMC requirements, including High Efficiency Toilets with a flush volume of 1.0 gallon per flush; waterless urinals; High Efficiency Showerheads with a flow rate of 1.5 gpm; Domestic Water Heating System located in close proximity to point(s) of use; Drip/Subsurface Irrigation (Micro-Irrigation); bubblers for trees; proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together); and Drought Tolerant Plants—60 percent of landscaped area. These water conservation features result in a reduction in energy associated with conveyance. Overall, as discussed in Section II, Project Description, of this Draft EIR, the Project would incorporate energy-efficient design methods and technologies whenever possible. Lastly, LADWP is required to procure at least 33 percent of its energy portfolio from renewable resources by 2020. Therefore, the Project would not cause the wasteful, inefficient, and unnecessary consumption of electricity or natural gas during operation.

With regard to transportation fuel, Project characteristics, such as increasing density, increasing the diversity of land uses, and developing employment-generating uses within close proximity to existing residential uses, would potentially reduce vehicle miles traveled. In addition, the Project Site is located in an area well-served by public transit provided by Metro and LADOT's bus lines and rail line. Specifically, the Project Site is served by several bus stops located along Sunset Boulevard and Gower Street, including Metro bus line 2, Los Angeles Department of Transportation (LADOT) Downtown Area Shuttle (DASH) Hollywood, and DASH Hollywood/Wilshire. In addition, the Metro Hollywood/Vine Station is located less than 0.5 mile northwest of the Project Site. Furthermore, the Project would provide short- and long-term bicycle parking spaces as required by the LAMC, in addition to bicycle-serving amenities that would further encourage biking, including the 1,450-square-foot bicycle storage facility that includes locker rooms with bathrooms and showers. Therefore, the Project would not cause the wasteful, inefficient, and unnecessary consumption of transportation fuel during operation.

Based on the above, the Project would not cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F to the CEQA Guidelines. In addition, Project operations would not conflict with adopted energy conservation plans.

d. Environmental Hazards

The Project's potential use of hazardous materials is evaluated in Section VIII.a, Hazards and Hazardous Materials, of the Initial Study included as Appendix A of this Draft EIR. As discussed therein, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Studio uses, in particular, would involve the use of hazardous materials such as paints, adhesives, aerosol spray paint, and film/photo developer solutions during movie and television production, set making, and general maintenance/cleaning. All potentially hazardous materials to be used during construction and operation of the Project would be contained, stored, used and disposed of in accordance with manufacturers' instructions and handled in accordance with all applicable standards and regulations, including, but not limited to, those set forth by the federal and State Occupational Safety and Health Acts (i.e., the Federal Resource Conservation and Recovery Act and California Hazardous Waste Control Law). Such requirements include obtaining material safety data sheets from chemical manufacturers, making these data sheets available to employees, labeling chemical containers in the workplace, developing and maintaining a written hazard communication program, and developing and implementing programs to train employees about hazardous materials. Finally, the Project would not involve the routine transport of hazardous materials. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. Therefore, it is not expected that the Project would cause irreversible damage from environmental accidents associated with the use of typical, potentially hazardous materials.

e. Extension of Roads and Other Infrastructure

The project represents an infill project within a fully urbanized area and would not extend roads or other infrastructure to areas not currently served by such roads and other infrastructure. Therefore, the Project would not open up new areas to development and commit future generations to such development.

f. Conclusion

Based on the above, Project construction and operation would require the irretrievable commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources and the Project Site for future generations or for other uses. However, the consumption of such resources would not be considered substantial and would be consistent with regional and local growth forecasts and

development goals for the area. The loss of such resources would not be highly accelerated when compared to existing conditions and such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result, such changes would be less than significant. Considering that the Project would consume an inconsequential amount of natural resources, and would replace an existing urban use on a redevelopment site, the limited use of nonrenewable resources is justified.

4. Growth-Inducing Impacts

Section 15126.2(d) of the CEQA Guidelines requires that growth-inducing impacts of a project be considered in a Draft EIR. Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant that, for example, may allow for more construction in service areas). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, thus requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also require a discussion of the characteristics of projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Finally, the CEQA Guidelines state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment. Growth can be induced by: (1) direct growth associated with a project; and (2) indirect growth created by demand not satisfied by a project or the creation of surplus infrastructure not utilized by a project.

As discussed in Section II, Project Description, of this Draft EIR, the Project proposes new studio-related creative office, production office/production support, and storage uses within three new buildings totaling 627,957 square feet of floor area. The Project would remove 160,611 square feet of existing floor area, consisting of 125,521 square feet of creative office floor area, 29,444 square feet of production support floor area, and 5,646 square feet of sound stage floor area. Approximately 1,400 square feet of existing service areas would also be removed. Because the Project would not include the construction of new housing that would generate a new population, it would not result in direct population growth. However, the Project is expected to result in varying types of indirect growth associated with employment. Below is a discussion of the potential indirect growth-inducing impacts of the Project.

The Project would have the potential to generate indirect population growth in the Project Site vicinity during construction. Given the duration of the Project, construction workers would not be expected to relocate their households' places of residence as a direct consequence of working on the Project. 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. Therefore, given the availability of construction workers, the Project would not be considered growth-inducing from a short-term employment perspective, but rather the Project would provide a public benefit by providing new temporary employment opportunities during the construction period.

The Project would also have the potential to generate indirect population growth in the Project Site vicinity during operation. The net increase in studio-related creative office, production office/production support, and storage use floor area would generate an increased permanent employee population at the Project Site, and potentially off-site jobs supporting the increased on-site operations and employees. However, according to Section XIII, Population and Housing, of the Initial Study, included as Appendix A of this Draft EIR, even if the new employment opportunities generated by the Project could induce population growth within the Hollywood Community Plan area, the increase in population would not be substantial since not all employees would necessarily move close to the Project Site. Some employment opportunities may be filled by people already residing in the vicinity of the Project Site, and other persons would commute to the Project Site from other communities in and outside of the City. Therefore, given that the Project would not directly contribute to substantial population growth in the Project area 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. As such, Project operation would not indirectly induce substantial population growth.

The area surrounding the Project Site is already developed with a mix of commercial/retail uses, entertainment-related commercial/retail uses, offices, hotels, and residential uses and the Project would not remove impediments to growth. The Project may require local infrastructure upgrades to maintain and improve sewer, electricity, and natural gas lines on-site and in the immediate vicinity of the Project Site. Such improvements would be intended primarily to meet Project-related demand and would not necessitate regional utility infrastructure improvements that have not otherwise been accounted for and planned for on a regional level. No extension of roads or infrastructure to currently un-served areas would occur, and no expansion of water or wastewater treatment plants would be required. The Project employees' demand for convenient commercial goods and services would be met by new retail, service, and other resources located within the surrounding community. No new development specifically to meet the Project's scale of commercial demand would be needed.

Overall, the Project would be consistent with the growth forecast for the SCAG Region and the City, and would be consistent with regional policies to reduce urban sprawl,

efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of vehicle miles traveled and with proximity to public transit options. Therefore, growth-inducing impacts would be less than significant.

5. Potential Secondary Effects of Mitigation Measures

Section 15126.4(a)(1)(D) of the CEQA Guidelines states that “if a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed.” With regard to this section of the CEQA Guidelines, the potential impacts that could result with the implementation of each mitigation measure proposed for the Project were reviewed. The following provides a discussion of the potential secondary impacts that could be associated with implementation of the proposed mitigation measures, listed by environmental issue.

a. Air Quality

Mitigation Measure AIR-MM-1 is included in Section IV.B, Air Quality, of this Draft EIR, to reduce the Project’s air quality impacts during construction. Specifically, Mitigation Measure AIR-MM-1 would require a Project representative to provide a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that with the exception of demolition activities will be used during any portion of construction to the lead agency and the South Coast Air Quality Management District. The inventory would include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit’s certified tier specification, Best Available Control Technology documentation, and California Air Resources Board or Air Quality Management District operating permit shall be available onsite at the time of mobilization of each applicable unit of equipment to allow the Construction Monitor to compare the on-site equipment with the inventory and certified Tier specification and operating permit. Off-road diesel-powered equipment within the construction inventory list described above shall meet the EPA Tier 4 Final standards where feasible. Implementation of AIR-MM-1 would not include the construction of physical improvements or other actions that would result in additional physical impacts on the environment. Implementation of AIR-MM-1 would be beneficial in reducing construction emissions for all pollutants and would not result in adverse secondary impacts.

b. Cultural Resources

Mitigation Measures CUL-MM-1 through CUL-MM-5 are included in Section IV.C, Cultural Resources, of this Draft EIR to reduce Project impacts on historical resources.

These mitigation measures require: (1) documentation of existing conditions at Sunset Gower Studios in accordance with Historic American Building Survey (HABS) guidelines; (2) development of an Historic Resources Plan to document existing historic resources, identify character-defining features and resources to be preserved, and establish a treatment plan for their continued preservation, including guidelines and procedures for any potential future rehabilitation or additions to existing potential historic district contributors to protect significant character-defining features of said contributors; (3) implementation of a multifaceted interpretive program that documents the history of the Sunset Gower Studios and provides information and directions to access other interpretive features; (4) development of a self-guided walking tour along Gower Street that details the history of Columbia Pictures and the Sunset Gower Studio's association with the Sunset Gower property; and (5) retention of a qualified historic preservation professional to ensure that Buildings A through C are designed and constructed in accordance with the Secretary of the Interior's Standards for Rehabilitation. None of these mitigation measures would include physical impacts on the environment, except for potentially the development of interpretive program and the self-guided walking tour which could include the placement of some plaques which would result in minimal if any environmental effects. Implementation of CUL-MM-1 through CUL-MM-5 would be beneficial in reducing Project impacts on historical resources and would not result in adverse secondary impacts.

Mitigation Measure CUL-MM-6 requires implementation of a shoring plan to ensure the protection of adjacent historic resources during construction from damage due to underground excavation and general construction procedures and to reduce the possibility of settlement due to the removal of adjacent soil. The physical effects on the environment associated with such shoring are subsumed in the construction impact analysis in Section IV of this Draft EIR (the impacts of this shoring would be part of the excavation impacts of the Project). In addition, implementation of this mitigation measure would be beneficial in reducing Project impacts on historical resources, and no additional adverse secondary impacts would occur.

Mitigation Measure CUL-MM-7 is included in Section IV.C, Cultural Resources, of this Draft EIR, to reduce Project impacts on archaeological resources. The mitigation measure requires a qualified archaeologist be retained to perform periodic inspections of excavation and grading activities at the Project Site. If archaeological materials are encountered, the archaeologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The mitigation measure further requires the archaeologist to assess the discovered material(s) and prepare a survey, study or report evaluating the impact. This mitigation measure could potentially require excavations to unearth additional archaeological resources, if such is the recommendation of the archaeologist. However, any such additional excavations would be expected to occur within the Project's excavation area, with any associated environmental effects subsumed in the construction impact

analysis for the Project in Section IV of this Draft EIR. Implementation of CUL-MM-7 would be beneficial in reducing Project impacts on archaeological resources, if any, and would not result in adverse secondary impacts.

c. Paleontological Resources

Mitigation Measures PAL-MM-1 is included in Section IV.E, Paleontological Resources, of this Draft EIR, to reduce Project impacts on paleontological resources. This mitigation measure requires that a qualified paleontologist be retained to perform periodic inspections of Project excavations and grading activities at the Project Site, and that if paleontological materials are encountered, excavation and grading activities be temporarily diverted from the area to facilitate evaluation and, if necessary, salvage. The mitigation measure further requires the paleontologist to assess the discovered materials, prepare a survey, study or report evaluating the impact, and compliance by the Applicant with the recommendations of the evaluating paleontologist. This mitigation measure could potentially require excavations to unearth additional paleontological resources, if such is the recommendation of the paleontologist. However, any such additional excavations would be expected to occur within the Project's excavation area, with any associated environmental effects subsumed in the construction impact analysis for the Project in Section IV of this Draft EIR. Implementation of PAL-MM-1 would be beneficial in reducing Project impacts on paleontological resources, if any, and would not result in adverse secondary impacts.

d. Noise

Mitigation Measure NOI-MM-1 included in Section IV.H, Noise, of this Draft EIR, would require that a temporary and impermeable sound barrier be erected, during Phase 1 and Phase 2 construction, along portions of the Project Sites eastern and southern boundaries. The installation of this sound barrier would include limited construction activities associated with its installation. In addition, as discussed in Section IV.A, Aesthetics, of this Draft EIR, temporary construction fencing would be placed along the periphery of the Project Site to screen construction activity from view at the street level. This would include screening of the temporary sound barrier. The sound barrier and screening would be temporary, and their purpose would be to reduce the Project's noise impacts during construction. Once construction is completed, the barriers would be removed. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

Mitigation Measure NOI-MM-2 requires: (1) a structural engineer or other qualified professional inspect the existing on-site historic buildings adjacent to the Project construction areas to document the apparent physical condition of the buildings; (2) the retention of a qualified acoustical engineer to review proposed construction equipment and

develop/implement a vibration monitoring program capable of documenting the construction-related ground vibration levels at the on-site historic buildings located within 20 feet of proposed construction activities during demolition and grading/excavation activities; (3) the implementation of vibration monitoring program; and (4) implementation of feasible steps to reduce vibration levels if they hit specified levels to avoid damage to the historical buildings. This mitigation would not include physical impacts on the environment, would be beneficial in reducing Project construction-related vibration impacts on historic buildings, and would not result in adverse secondary impacts

6. Revisions to State CEQA Guidelines Appendix G

In January 2018, the Office of Planning and Research proposed comprehensive updates to the CEQA Guidelines which revised thresholds for aesthetics, air quality, cultural resources, geology and soils, hydrology and water quality, land use and planning, noise, population and housing, transportation, and utilities and service systems and included additional thresholds to address wildfires. This Draft EIR considers the revised thresholds for the environmental topics addressed herein in Section IV, Environmental Impact Analysis. In addition, the new topic of telecommunications facilities added to the revised thresholds for utilities and service systems as well as the new thresholds addressing wildfires are discussed below.

a. Telecommunications Facilities

As provided in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the revised threshold (a) under utilities and service systems set forth in Appendix G of the State CEQA Guidelines is as follows: would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

The Project would require construction of new on-site telecommunications infrastructure (phone lines, internet connections, etc.) to serve new buildings and potential upgrades and/or relocation of existing telecommunications infrastructure. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. However, the Project would prepare a Construction Management Plan pursuant to Project Design Feature TR-PDF-1 included in Section IV.J, Transportation, of this Draft EIR, which would ensure safe pedestrian access as well as emergency vehicle access and safe vehicle travel in general, to reduce any temporary pedestrian and traffic impacts occurring as a result of construction activities. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short

duration (i.e., months) and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would primarily take place on-site, with minor off-site work associated with connections to the main public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers.

b. Wildfire

Wildfires are briefly addressed in the Initial Study included as Appendix A. However, the revisions to Appendix G include more detailed questions regarding wildfires. These new thresholds are as follows:

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?*

The Project Site is located in an urbanized area, and there are no wildlands located in the vicinity of the Project Site. In addition, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone, nor is it located within a City-designated fire buffer zone. Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Impacts related to wildfire would be less than significant.

7. Effects Not Found to Be Significant

Section 15128 of the CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were

determined not to be significant and not discussed in detail in the EIR. An Initial Study was prepared for the Project and is included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City determined, through the Initial Study, that the Project would not have the potential to cause significant impacts related to the following: a scenic vista; scenic resources within a state or City-designated scenic highway; agriculture and forestry resources; objectionable odors; biological resources; geology and soils; hazards and hazardous materials; hydrology and water quality; physical division of an established community; conflict with an adopted habitat conservation plan (HCP) or natural community conservation plan (NCCP); mineral resources; excessive noise levels within an airport land use plan or two miles of a public airport or private airstrip; population and housing; change in air traffic patterns; hazards due to a design feature; and compliance with federal, state, and local statutes and regulations related to solid waste. A summary of the analysis in the Initial Study for these issue areas is provided below.

a. Aesthetics (Scenic Vistas, Scenic Resources, Light/Glare)

As discussed in the Initial Study included in Appendix A of this Draft EIR, in accordance with Senate Bill 743 (Public Resources Code Section 21099(d)), the Project is an employment center located within a transit priority area (TPA). As such, the aesthetic and parking impacts of the Project shall not be considered significant impacts on the environment. Nonetheless, an analysis of potential aesthetic impacts of the Project has been provided for informational purposes only.

The Project does not propose any new development along Gower Street. In addition, there would be no publicly available scenic vistas of the Hollywood Hills from Sunset Boulevard because the area is highly urbanized and developed with one- to four-story buildings (i.e., Siren Studios buildings at 6087, 6069, 6061, 6063 Sunset Boulevard) on the north side of Sunset Boulevard. Therefore, views are already obstructed along Sunset Boulevard. Finally, while there are views of the Hollywood Hills along the eastern boundary, Gordon Street, of the Project Site, these views would not be obstructed by the proposed development since the proposed garage structure would not encroach on the public right-of-way. Overall, the Project would not have a substantial adverse effect on a publicly available scenic vista, and impacts would be less than significant.

The Project Site is not located along a State scenic highway. The nearest officially eligible State scenic highway is along the Foothill Freeway (I-210), approximately 15 miles northeast of the Project Site, and the nearest City-designated scenic highway is along Sunset Boulevard, approximately seven miles west of the Project Site. In addition, the on-site and off-site trees are not considered scenic resources. Furthermore, there are no

permanent structures or unique geologic or topographic features located on the Project Site. Therefore, the Project would not substantially damage scenic resources within a State or City-designated scenic highway, and no impact would occur.

The Project Site currently generates moderate levels of artificial light and glare from low-level security lighting, and glass building surfaces. Although the Project would introduce new exterior lighting on the buildings and along pathways, the outdoor lighting would be low-level and not result in a substantive change in ambient illumination levels over existing conditions. In addition, outdoor lighting would be shielded such that the light source cannot be seen from adjacent residential properties to the south and east of the Project Site, or the public right-of-way, and would be dark-sky compliant. Hence, impacts would be less than significant.

While the new Project buildings would feature glass surfaces, the sawtooth windows and curtain walls would minimize the use of mirror coatings. There would be no other use of highly polished surfaces since the rest of the elevations of Buildings A, B, and C would feature black standing seam metal panels and exposed black steel beams and the proposed parking structure would feature polycarbonate panels and vertical black metal fins. In addition, only a part of the proposed new development would occur adjacent to streets. Specifically, only proposed Building A would front Sunset Boulevard, and the proposed parking structure at the corner of Fountain Avenue and Gordon Street would feature an approximate 16-foot landscaped buffer along Gordon Street, and Buildings B, C, and the bike parking facility would be located entirely within the Project Site and away from any adjacent streets. Therefore, Project daytime glare would be less than significant.

b. Agricultural Resources

The Project Site is currently developed with urban uses and is located within an urbanized area. No agricultural or other related activities occur on the Project Site or within the vicinity of the Project Site, and there is no Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or forest land located on the Project Site. In addition, the Project Site is currently zoned M1-1 (Limited Industrial Zone, Height District 1), and is not subject to an active Williamson Act contract. As the Project would not involve the conversion of farmland or forestland, or conflict with agricultural or forest land zoning, no impacts to agricultural land or uses would occur.

c. Air Quality (Odors)

No objectionable odors are anticipated as a result of construction of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not

be sufficient to affect a substantial number of people.

With respect to Project operation, according to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses. On-site trash receptacles would 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, SCAQMD 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.

Based on the above, the potential odor impact during construction and operation of the Project would be less than significant.

d. Biological Resources

The Project Site is located in an urbanized area and is currently occupied by urban uses. Due to the urbanized and disturbed nature of the Project Site and the surrounding developed areas, as well as lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. In addition, the Project Site contains limited to sparse landscaping in the form of non-native/non-protected trees, hedges, and shrubs that are dispersed across the Project Site. Thus, based on the lack of habitat on the Project Site, special status species would not be anticipated to be present on-site. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City. Therefore, the Project would not have any adverse effect, either directly or through habitat modification, on listed species, and impacts would be less than significant.

No riparian, other sensitive natural community, or federally protected wetlands as defined by Section 404 of the Clean Water Act, exist on the Project Site or within the vicinity. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County of Los Angeles, and there are no other sensitive natural communities identified by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service on-site or within the Project vicinity. Therefore, the Project would not have a substantial adverse effect on riparian habitat, other sensitive natural community, or federally protected wetlands, and no impact would occur.

There are no large expanses of open space areas within and surrounding the Project Site that provide linkages to natural open spaces areas and that may serve as wildlife corridors. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County of Los Angeles. Hence, the Project would not interfere with the movement of native resident or migratory terrestrial wildlife or fish species. Although unlikely, the on-site trees that would be removed during construction of the Project could potentially provide nesting sites for migratory birds. However, the Project would comply with the Migratory Bird Treaty Act, which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur.

The City's Protected Tree Ordinance regulates the relocation or removal of Southern California native oaks (excluding scrub oak), California black walnut, Western sycamore, and California Bay trees of at least four inches in diameter at breast height. These tree species are defined as "protected" by the City. The City's Protected Tree Ordinance prohibits, without a permit, the removal of any regulated protected tree, including "acts which inflict damage upon root systems or other parts of the tree..." and requires that all regulated protected trees that are removed be replaced on at least a 2:1 basis with trees that are of a protected variety. The Project would not involve the removal of trees considered protected under the City Native Tree Protection Ordinance. The Project would require the removal of 29 non-protected trees within the Project Site and two street trees, but pursuant to the requirements of the City Urban Forestry Division, the on-site trees would be replaced on a 1:1 basis and the street trees on a 2:1 basis. Therefore, the Project would not conflict with local policies or ordinances protecting biological resources.

Lastly, the Project Site is not subject to an HCP, NCCP, or other approved local, regional, or state habitat conservation plan, and thus the Project would not conflict with any such plan. No impact would occur.

e. Geology and Soils

The Project Site is not within an Alquist-Priolo Earthquake Fault Zone or within a City-designated Fault Rupture Study Area. The closest active fault is the Hollywood Fault, located approximately 0.78 mile north of the Project Site. Furthermore, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site, and the site is located outside of a State fault-rupture hazard zone. Therefore, the Project would not exacerbate existing environmental conditions such that people or structures would be exposed to rupture of a known earthquake fault. Project fault rupture impacts would be less than significant.

The Project Site is located in the seismically active Southern California region. However, no active faults are known to pass directly beneath the Project Site such that the

Project would not exacerbate existing environmental conditions (i.e., trigger an earthquake by disrupting a known earthquake fault) such that people or structures would be exposed to strong seismic ground shaking. Furthermore, the Project would not involve mining, deep excavations, or large borings that could create unstable seismic conditions. Lastly, the Project would comply with the Los Angeles Building Code, which incorporates current seismic design provisions of the California Building Code. Therefore, the Project would not result in strong seismic ground shaking caused in whole or in part by the Project's exacerbation of the existing environmental conditions, or expose persons to substantial seismic hazards, and seismic impacts would be less than significant.

Neither the City of Los Angeles nor the State of California classifies the Project Site as part of a potentially liquefiable area. In addition, and even though there are sandy soils at the Project Site, there is no shallow ground water and, as discussed above, development of the Project would not exacerbate existing conditions that would cause people or structures to be exposed to strong seismic ground shaking. Thus, not all three conditions for liquefaction are met (i.e., shallow groundwater, sandy soils and strong ground motion) that could cause liquefaction. Therefore, the Project would not exacerbate existing environmental conditions that could cause seismic-related ground failure, including liquefaction, and liquefaction impacts would be less than significant.

The Project Site and surrounding area are fully developed and generally characterized by flat topography. The Project Site is not located in a landslide area as mapped by the State or the City of Los Angeles, or in a State earthquake-induced landslide hazard zone. Furthermore, the Project does not propose creating steep slopes, and the Project Site would remain flat. Therefore, the Project would not exacerbate existing conditions that would result in landslides, and no landslide-related impacts would occur.

The Project Site is currently developed, and no large areas with exposed topsoil currently exists. Development of the Project would require grading, excavation, and other construction activities that have the potential to disturb existing soils underneath the Project Site and expose these soils to rainfall and wind during construction, thereby potentially resulting in soil erosion. However, this potential would be reduced by implementation of standard erosion controls and compliance with applicable City grading and erosion control requirements. Regarding soil erosion during Project operations, the potential would be negligible since the Project Site would mostly remain fully developed, except for a small landscape buffer to the south of the proposed parking structure at Gordon Street and Fountain Avenue. However, this buffer would be landscaped with trees to prevent soil erosion. Therefore, soil erosion and loss of topsoil impacts would be less than significant.

No large-scale extraction of groundwater, gas, oil or geothermal energy is occurring or planned at the Project Site or in the general Project Site vicinity. Therefore, the Project Site is not located on a geologic unit or soil that is unstable nor would the Project cause a

geologic unit or soil to become unstable. In addition, the Project Site is not located near slopes or geologic features that would result in on- or off-site landsliding or lateral spreading. As such, the Project would not exacerbate existing conditions such as unstable geologic units or unstable soil. In addition, as discussed above, landsliding is not a hazard at the site, and on-site liquefaction is unlikely. Therefore, impacts related to unstable soils or geologic units (e.g., landslides, lateral spreading, subsidence, liquefaction, and collapse) would be less than significant.

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. Although there are clayey sands underneath the Project Site, the soils have a very low to moderate expansion potential. Therefore, the Project would not exacerbate existing environmental conditions that could create substantial risk to life or property due to expansive soil. Also, through standard construction practices involving excavation activities and removal of underlying soils as well as the subsequent use of engineered soils, effects associated with expansive soils would be addressed. As such, the Project would not increase the expansion potential of underlying soils, and expansive soils impacts would be less than significant.

Lastly, since the Project Site would be served by the existing municipal sewer system, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems.

f. Hazards and Hazardous Materials

The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction and operation of commercial projects (e.g., vehicle fuels, paints, oils, and transmission fluids, etc., during construction, and cleaning solvents, pesticides for landscaping, painting supplies, petroleum products, etc. during operation). These would be contained, stored, used and disposed of in accordance with manufacturers' instructions and handled in accordance with all applicable standards and regulations, including, but not limited to the Federal Resource Conservation and Recovery Act (RCRA) and California Hazardous Waste Control Law. Such requirements include obtaining material safety data sheets, making these data sheets available to employees, labeling chemical containers in the workplace, developing, maintaining and implementing a written hazard communication program and programs to train employees about hazardous materials. Finally, the Project would not involve the routine transport of hazardous materials. Therefore, Project impacts related to the routine transport, use, or disposal of hazardous materials would be less than significant.

Regarding reasonably foreseeable upset and accident conditions involving the release of hazardous materials, the Phase I Environmental Site Assessment (ESA) indicates the following:

- (1) Recognized environmental conditions (RECs) are associated with the gasoline station previously located in the northwest corner of the Project Site, machine shop and paint spray booth located in the northeastern portion of the Project Site, auto repair area and gasoline pumps, and auto repair and oil storage area. TPH, BTEX, and VOCs were not detected in any of the soil or soil vapor samples. Arsenic was detected in three of the soil samples, exceeding EPA Preliminary Remediation Goals but these detections were below the average concentration range of arsenic in California. The metal concentrations in the samples analyzed did not exceed the Total Threshold Limit Concentration and would not be classified as a California hazardous waste. Based on these findings, the identified RECs are considered historical recognized environmental conditions (HRECs) which are past releases of hazardous substances or petroleum that has been addressed to the satisfaction of the applicable regulatory authority or meets unrestricted use criteria without subjecting the property to any required controls.
- (2) The building at 6060 Sunset Boulevard accommodated studio uses from 1918 to 2005 for which various chemicals, including solvents were used and stored. Soil and soil vapor testing detected VOCs below Permissible Exposure Limits established by Cal-OSHA and recommended American Conference of Governmental Industrial Hygienists Threshold Limit Values.
- (3) The site contains one aboveground storage tank (AST) used for diesel storage, various identified hazardous materials typical of the existing on site uses, including spray paints/enamels, paint thinners, oils, acetylene and oxygen cylinders, plasters, sealers, cooling water treatment chemicals, propane tanks, and diesel for gardening tools; polychlorinated biphenyls (PCBs) associated with the on site pad-mounted transformers and transformer stations, a hydraulic lift/dock with a five-gallon reservoir, and on site elevators; radioactive materials associated in the self-luminescent tritium exit signs typical of many public and private office buildings in the United States; wells, cisterns, sumps, and drains; and wastewater or grease interceptors. No spills, staining, or leaks were observed, and routine janitorial and maintenance supplies were stored properly with no signs of staining or leaking. Minor staining was observed around the five-gallon reservoir associated with the hydraulic lift/dock and at one of the elevator rooms, but such staining is not expected to represent a significant environmental concern. The radioactive materials associated with the exit signs were also found to not constitute a REC. Also, no wells, cisterns, sumps, drains, or wastewater or grease interceptors were found.

- (4) Based on the age of the on-site buildings, there are presumed to be asbestos-containing materials (ACMs) and lead-based paints (LBPs) at the Project Site. However, in the event any suspect ACMs or LBPs is found during demolition activities, the Project would adhere to all federal, State, and local regulations prior to their disturbance and removal. These regulations include, but are not limited to, the Toxic Substances Control Act, the Resource Conservation and Recovery Act, the federal and State Occupational Safety and Health Acts, SCAQMD Rule 1403 pertaining to asbestos emissions from renovation/demolition activities, and the Residential Lead-Based Paint Reduction Act. Mandatory compliance with applicable federal and State standards and procedures would reduce risks associated with ACMs and LBP to less-than-significant levels.
- (5) The Project Site is not within an active or inactive oil field and is not within a Methane Zone or Methane Buffer Zone identified by the City. The Division of Oil, Gas & Geothermal Resources Online Mapping System shows that there is an oil well approximately 960 feet west of the Project Site, but lists the status for the oil well as inactive and plugged. Therefore, there is a negligible risk of subsurface methane release.

Based on the above, with compliance with regulatory requirements, the Phase I ESA concludes that the Project would not result in a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials, and impacts would be less than significant.

Joseph Le Conte Middle School is located approximately 0.25 mile east of the Project Site. However, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used within and in the vicinity of the Project Site, and the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Furthermore, hazardous materials use during Project construction and operation would occur in accordance with manufacturers' instructions and applicable regulations, and truck haul routes during Project construction would not travel adjacent to the school. As such, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, and impacts would be less than significant.

With regard to the potential for the Project to exacerbate existing environmental conditions associated with listed hazardous materials/waste sites, the Phase I ESA indicates that the Project Site is listed on multiple hazardous materials/waste databases, including on the RCRA database as a Small Quantity Generator, the RCRA Non Generators list, the DTSC Hazardous Waste Information System (HAZNET) database as a

generator of hazardous wastes, oil/water separation sludge, and asbestos containing waste. However, the Phase I ESA indicates that these listings are due to the use of specific hazardous materials that are typical of studio productions and sets, that there are no reported violations, and that compliance with existing regulations would avoid Project-related exacerbation of existing environmental conditions associated with these listings. Therefore, impacts would be less than significant.

Regarding airport-related hazards, the Project Site is not located within the vicinity of an airport or private airstrip, and is not located within an airport land use plan area, such that the Project would not result in an airport-related safety hazard for people residing or working in the Project area, and no impact would occur.

Concerning the potential to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, the Project Site is not located along a City-designated disaster evacuation route. Furthermore, the majority of Project construction activities would be confined to the Project Site and would not occur on designated disaster evacuation routes. Also, the Project does not propose closure of any existing public streets, and access to the Project Site and adjacent properties would be maintained during construction (in accordance with the proposed Construction Traffic Management Plan) and operation. Hence, the Project would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan, and impacts would be less than significant.

Lastly, there are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or within a City-designated fire buffer zone. Therefore, the Project would not exacerbate existing conditions (i.e., here are no wildlands adjacent to the Project Site) that would subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires, and no impact would occur.

g. Hydrology and Water Quality

Regarding the potential for violation of water quality standards or waste discharge requirements, Project construction activities could generate sediment and pollutants that could be conveyed to the municipal storm drain system in stormwater runoff from the construction site(s). However, the Project would be required to implement a Stormwater Pollution Prevention Plan (SWPPP) under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, including Best Management Practices (BMPs) to minimize the discharge of pollutants in stormwater runoff during construction. The SWPPP would be carried out in compliance with State Water Resources Control Board requirements and would also be subject to review by the City for compliance with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities. In

addition, Project construction activities would occur in accordance with City grading permit regulations, such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Furthermore, Project excavations would not be anticipated to disturb the groundwater table so that permanent dewatering would not be required, and if temporary dewatering associated with encountering perched groundwater is required, it would be implemented in accordance with NPDES requirements. Hence, Project construction would not result in the violation of water quality standards or waste discharge requirements, and impacts would be less than significant.

Project operation would introduce sources of potential water pollution that are typical of commercial developments, including studio uses (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with circulation areas). Stormwater runoff from precipitation events could also potentially carry urban pollutants into municipal storm drains. However, in accordance with the City's Low Impact Development (LID) Ordinance, BMPs would be implemented on-site to address City and State water quality requirements. With compliance with these regulations, Project operation would not violate water quality standards or waste discharge requirements, and impacts would be less than significant.

With regards to groundwater, the Project would not require permanent dewatering or include groundwater wells such that it would not substantially deplete groundwater supplies. Furthermore, the Project would not substantially increase impervious surfaces at the Project Site which is already mostly developed with impervious surfaces such that it would not interfere substantially with groundwater recharge. Hence, Project groundwater impacts would be less than significant.

Concerning stormwater drainage, impacts to the capacity of the local municipal stormwater drainage system, the generation of polluted runoff, and the potential for the Project to otherwise substantially degrade water quality, no streams or rivers bisect the Project Site, the Project would not substantially alter existing drainage patterns, the Project would not substantially increase on-site impervious surfaces, and post-development runoff flows from the Project Site would decrease from 44.27 cfs to 43.75 cfs during the 50-year storm event. In terms of polluted runoff, the Project's proposed uses would be typical of studio-related operations and would not introduce substantial sources of polluted water that an industrial operation would introduce, for example. Moreover, even if some polluted runoff were generated, the Project would implement BMPs to filter, treat, and reduce stormwater pollutants prior to discharge from the Project Site in accordance with the City's LID requirements and SWPPP. Thus, the Project would not substantially increase surface runoff in a manner which would result in flooding on- or off-site, would not exceed the capacity of the local municipal stormwater drainage system, and would not provide substantial additional sources of polluted runoff. Impacts would be less than significant.

With respect to development within a 100-year flood hazard area, and potential impedance or redirection of flood flows, and flooding, the Project Site is not located within a 100-year flood hazard areas as mapped by the Federal Emergency Management Agency (FEMA) or the City. Hence, the Project would not place structures within a 100-year flood hazard area or impede/redirect flood flows, and no impact would occur.

Regarding exposing people or structures to flooding, including flooding as a result of the failure of a levee or dam, the Project Site is not located within a 100-year flood hazard area, and the Project would result in a decrease rather than an increase in stormwater runoff flows so that the Project would not result in on- or off-site flooding. Furthermore, while the Project Site is located within the potential inundation area for the Hollywood Reservoir, which is held by the Mulholland Dam, the dam is continually monitored by various government agencies to guard against dam failure and has been designed to withstand the maximum considered earthquake. In addition, the LADWP has emergency response plans to address any potential impacts to its dams. Given the oversight by the Division of Safety of Dams, including regular inspections, and the LADWP's emergency response program, the potential for substantial adverse impacts related to flooding at the Project Site as a result of dam failure would be less than significant.

Lastly, regarding potential inundation by seiche, tsunami, or mudflow, the Project Site is located approximately 11.6 miles northeast of the Pacific Ocean. In addition, the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami. Given the Project Site's location approximately 1.3 miles south of the Hollywood Reservoir, impacts from mudflow or a seiche occurring within the reservoir are unlikely. Moreover, as discussed above, given the oversight of the Hollywood Reservoir's Mulholland Dam by the Division of Safety of Dams, including regular inspections, as well as the LADWP's emergency response program, the potential for substantial adverse impacts at the Project Site relating to seiche or mudflow as a result of dam failure would be less than significant. Therefore, no seiche, tsunami, or mudflow events would be expected to impact the Project Site, and no impact would occur,

h. Land Use and Planning (Division of an Established Community, Conflicts with an HCP or NCCP)

The Project Site is located in a highly urbanized area. The Project proposes the preservation and enhancement of portions of the existing Sunset Gower Studios including the development of new studio-related creative office, production office/production support and storage uses, and parking facilities. All proposed development would occur within the boundaries of the existing Sunset Gower Studios, which is fully developed, and the Project does not propose a freeway or other large infrastructure or barrier that would divide a community. Therefore, the Project would not physically divide an established community, and impacts would be less than significant.

The Project Site is already developed with urban uses, is located within a fully urbanized area, and is not subject to an adopted HCP or NCCP. As such, the Project would not conflict with an adopted HCP or NCCP, and no impact would occur.

i. Mineral Resources

No mineral extraction operations currently occur on the Project Site. The Project Site is currently developed with urban uses, is located in an urbanized area, and is surrounded on all sides by urban development. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, a mineral producing area as classified by the California Geologic Survey, or a City-designated oil field or oil drilling area. Therefore, the Project would not result in the loss of availability of a know mineral resource that would be of value to the region and the residents of the state, or of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. No impact would occur.

j. Noise (Airport/Aircraft Noise)

The Project Site is not located within an airport land use plan or within two miles of an airport or private airstrip. The closest airport to the Project Site, Hollywood Burbank Airport, is located approximately 7.2 miles from the Project Site. Given the distance between the Project Site and Hollywood Burbank Airport, the Project would not have the potential to expose people working or residing in the Project area to excessive airport- or aircraft-related noise levels. Therefore, no impact would occur.

k. Population and Housing

The Project would result in the construction of new creative office and production support uses. Since the Project does not propose a housing component, it would not directly induce a new residential population which would contribute to population growth in the vicinity of the Project Site or Hollywood Community Plan area.

While construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized 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 construction. Thus, Project construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project which could induce substantial population growth.

With regards to operation, the Project Site is located within the highly urbanized Hollywood Community Plan Area, which is already fully developed with homes and businesses. The Project would not introduce new homes or businesses since the Project calls for the continuation of the commercial uses at the existing Sunset Gower Studios. Even if the new employment opportunities generated by the proposed uses could induce population growth, the increase in population would not be substantial since not all employees would necessarily move close to the Project Site. Some employment opportunities may be filled by people already residing in the vicinity of the Project Site, and other persons would commute to the Project Site from other communities in and outside of the City. Therefore, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. As such, the Project would not result in substantial population growth by proposing new homes and businesses. Further, as the Project would be located in a highly developed area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth.

Lastly, no housing currently exists on the Project Site such that the Project would not displace any housing, and it is anticipated that the studio employees currently working in the existing on-site buildings to be removed under the Project would continue to work at the Project Site after Project completion such that the Project would not displace substantial numbers of people.

Based on the above, the Project would not induce substantial population in the area, either directly or indirectly, nor would it displace substantial numbers of housing or people necessitating the construction of replacement housing elsewhere. Hence, Project population growth inducement impacts would be less than significant, and no population or housing displacement impacts would occur.

I. Public Services (Schools, Parks, Libraries)

The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). LAUSD is divided into six local districts. The Project does not propose the development of residential uses such that it would not result in a direct increase in the number of students within the LAUSD. In addition, not all new employees of the Project would necessarily relocate to the vicinity of the Project Site, which could otherwise trigger a demand for new or expanded school facilities. Furthermore, even if there were new school facilities that would need to be built, pursuant to Senate Bill 50, the Project Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits, and pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Therefore, Project impacts on schools would be less than significant.

Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. Approximately ten parks and recreational facilities are located within a 2-mile radius of the Project Site. Because the Project does not propose residential uses, it would not result in on-site residents who would utilize nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create a demand for parks. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks. In addition, Project employees would be more likely to use parks near their homes during non-work hours. Lastly, the Project proposes on-site open space amenities such as landscaped courtyards and terraces with seating for use by employees, reducing the likelihood they would use local parks. Therefore, Project impacts on parks would be less than significant.

The Los Angeles Public Library (LAPL) provides library services to the City. The Project area is served by the Frances Howard Goldwyn Hollywood Regional Library, located 0.6-mile northwest of the Project Site. The Project does not propose the development of residential uses, and thus would not result in a direct increase in the number of residents within the service population of the Hollywood Regional Library. In addition, Project employees would have internet access to LAPL and other web-based resources, decreasing the demand on library facilities. Lastly, as Project employees would be more likely to use library facilities near their homes during non-work hours and given that some of the employment opportunities generated by the Project would be filled by people already residing in Project area, Project employees would generate minimal library demand. Therefore, Project impacts on libraries would be less than significant.

m. Recreation

As described above many public parks and recreational facilities are located in the vicinity of the Project Site. One regional park, Runyon Canyon Park, is also located approximately two miles northwest of the Project Site. As previously discussed, the Project does not propose the development of residential uses which would create a demand on nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create a demand for parks and recreational facilities. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to

access off-site local parks and recreational facilities. In addition, Project employees would be more likely to use parks near their homes during non-work hours. Therefore, the Project would not substantially increase the demand for off-site public parks and recreational facilities, such that substantial physical deterioration of those facilities would occur or be accelerated, and Project recreation impacts would be less than significant.

n. Transportation/Circulation (Air Traffic Patterns/ Levels, Hazards Due to Design Features/Incompatible Uses)

The Project proposes a new 300-foot-tall building and three 89-foot-tall structures. However, the Project Site is not located within the vicinity of any private or public airport or planning boundary of any airport land use plan. Additionally, the Project does not propose any uses that would increase the frequency of air traffic. Furthermore, the Project would be required to comply with the notice requirements imposed by the FAA for all new buildings taller than 200 feet and would complete Form 7460-1 (Notice of Proposed Construction or Alteration). Therefore, the Project would not result in a change in air traffic patterns that could result in substantial safety risks, and impacts would be less than significant.

The Project's design does not include hazardous design features (e.g., sharp curves or dangerous intersections). The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections, and the development of the Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. In addition, the Project would be consistent with the surrounding uses (i.e., commercial) and would not introduce hazards due to incompatible uses such as farm equipment. Therefore, no impact would occur.

o. Utilities and Service Systems (Solid Waste)

The Project would generate solid waste requiring disposal during both Project construction and operation. Pursuant to the requirements of Senate Bill 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the inert waste landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. After accounting for mandatory recycling, the Project would result in approximately 3,414 tons of construction and demolition waste. This would represent approximately 0.006 percent of the remaining permitted capacity at the Azusa Land Reclamation facility and approximately 0.004 percent of the remaining permitted capacity at Class III landfills open to the City. Therefore, Project construction impacts on solid waste disposal capacity would be less than significant.

The Project's net increase in solid waste generation during operation would be approximately 1,715 tons of solid waste per year. This would represent approximately 0.06 percent of the City's annual solid waste disposal and approximately 0.002 percent of the remaining capacity for the County's Class III landfills open to the City of Los Angeles. The Project's estimated solid waste generation would therefore represent a nominal percentage of the remaining daily disposal capacity of the County's Class III landfills. Therefore, Project operational impacts on solid waste disposal capacity would be less than significant.

Several solid waste regulations apply to the Project. by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 341 requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The City's RENEW LA includes as its primary goal shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. AB 1826, requires businesses to recycle their organic waste. The Project would comply with these regulations. The Project would also provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171687), which requires that development projects include an on-site recycling area or room of specified size. The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. As the Project would comply with federal, state and local regulations related to solid waste, impacts would be less than significant.