VI. Other CEQA Considerations

VI. Other CEQA Considerations

1. Significant Unavoidable Impacts

CEQA Guidelines Section 15126.2(b) 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 Project-level impacts that cannot be feasibly mitigated with respect to on- and off-site construction noise; on-site construction vibration (building damage and human annoyance); and off-site construction vibration (human annoyance). Implementation of the Project would also result in significant cumulative impacts that cannot be feasibly mitigated with regard to off-site vibration (human annoyance) during construction.

a. On-Site Construction Noise

As discussed in Section IV.F, Noise, of this Draft EIR, implementation of Mitigation Measure NOI-MM-1 provided therein would reduce the Project's and cumulative construction noise levels to the extent feasible. Specifically, implementation of Mitigation Measure NOI-MM-1 (installation of temporary sound barriers) 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 to the north of the Project Site (receptor location R1), the residential uses to the east (receptor location R2), and residential uses to the south (receptor location R3), which would reduce impacts at receptor location R3 to less than significant level. However, the construction-related noise would still exceed the significance threshold at receptor location R1 by 12.7 dBA and at receptor location R2 by 7.6 dBA. The noise impacts at locations R1 and R2 would be temporary when construction equipment is operating at the northern portion of the Project Site with direct line-of-sight to the receptor locations R1 and R2. However, there are no other feasible mitigation

measures to further reduce the construction noise at location R1 and R2 to below the significance threshold. Therefore, construction noise impacts associated with on-site noise sources would remain significant and unavoidable.

b. Off-Site Construction Noise

As discussed in Section IV.F, Noise, of this Draft EIR, during construction, the estimated noise levels from the Project-related trucks along Seward Street would exceed the 5-dBA significance criteria. There are no feasible mitigation measures that could be implemented to reduce this short-term impact because conventional mitigation measures, such as providing temporary noise barrier walls to reduce the offsite 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. Therefore, the Project's construction noise impact associated with off-site construction traffic would be significant and unavoidable.

c. On-Site Construction Vibration (Building Damage)

As discussed in Section IV.F, Noise, of this Draft EIR, estimated vibration velocity levels at the Seward Film Vaults north of the Project Site would exceed the significance criteria for historic structures of 0.12 PPV. With implementation of Mitigation Measure NOI-MM-2 and the Mitigation Measure CUL-MM-1, potential building damage impacts to the Seward Film Vaults building would be reduced to less than significant levels. However, because implementation of Mitigation Measure NOI-MM-2 requires consent from the adjacent property owner, who may not agree, it is conservatively concluded that structural vibration impacts on the Seward Film Vaults building would be significant and unavoidable because it cannot be assured that all components of NOI-MM-2 can be implemented.

d. On-Site Construction Vibration (Human Annoyance)

As discussed in Section IV.F, Noise, of this Draft EIR, estimated ground-borne vibration levels would be up to 94 VdB at receptor location R1 and up to 74 VdB at receptor location R2, which would exceed the 72 VdB significance criteria pursuant to human annoyance. The vibration exceedance would occur during the demolition and grading/excavation phases with large construction equipment (i.e., large bulldozer, caisson drilling, and loaded trucks) operating within 80 feet of the receptor locations R1 and R2. As discussed in Section IV.F, Noise, of this Draft EIR, there are no feasible mitigation measures that could be implemented to reduce the temporary vibration impacts from on-site construction associated with human annoyance to a less-than-significant level. Therefore, Project-level vibration impacts from on-site construction activities with respect to human annoyance would be significant and unavoidable.

e. Off-Site Construction Vibration (Human Annoyance)

As evaluated in Section IV.F, Noise, of this Draft EIR, the residential uses along Ardmore Avenue, Melrose Avenue, and Seward Avenue are located approximately 25 feet from the truck haul route and would be exposed to ground-borne vibration levels of approximately 72.6 VdB, which would exceed the 72-VdB significance criteria. In addition, there are studios (recording) located along Melrose Avenue and Seward Avenue, which would also be exposed to vibration level up to 72 VdB, which would exceed the 65-VdB recording studio significance criteria. In addition, it is anticipated that some of the related projects would use similar trucks as the Project, including Related Projects No. 7 and 9 (located along Melrose), which could utilize Ardmore Avenue and Melrose Avenue (as from the US-101 Freeway) and Related Projects No. 4 and 8 (located near Santa Monica Boulevard), which could utilize Santa Monica Boulevard and Western Avenue to access the US-101 Freeway. If related projects use similar trucks as the Project, it is anticipated that construction trucks from the related projects would generate similar vibration levels along the anticipated truck route (i.e., Ardmore Avenue, Melrose Avenue, and Western Avenue), which would exceed the significance criteria. Since there are no feasible mitigation measures that would reduce the potential vibration impacts with respect to human annoyance, Project-level and cumulative vibration impacts with respect to human annoyance as a result of off-site construction truck travel 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, CEQA Guidelines Section 15126.2(b) 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 a comprehensive list of project objectives included in Section II, Project Description, of this Draft EIR.

As discussed in Section II, Project Description, of this Draft EIR, the underlying purpose of the Project is to provide an infill commercial development for growing retail, hospitality, entertainment, and technology companies looking to locate businesses within the Hollywood community. The underlying purpose and objectives of the Project are closely tied to the goals and objectives of the Hollywood Community Plan, which supports the objectives and policies of applicable larger-scale regional and local land use plans, including SCAG's 2020–2045 Regional Transportation Plan/Sustainability Communities Strategy Connect SoCal (2020–2045 RTP/SCS) and the City's General Plan.

The Project's general consistency with the applicable goals set forth in the 2020–2045 RTP/SCS is analyzed in Table 4 of Appendix F to this Draft EIR. As detailed therein, the Project would be generally consistent with the applicable goals set forth in the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating environmental effects. Specifically, the Project would support the goals of the 2020–2045 RTP/SCS to improve mobility, accessibility, reliability, and travel safety, 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 on an infill location within an existing urbanized area that provides 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 Project would provide bicycle parking spaces for the proposed uses that would serve to promote the use of bicycles. The Project would also provide charging stations to serve electric vehicles. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and walking and biking, and thereby improve the environment and health of nearby residents by supporting low and zero emission modes of transportation.

The Project would support the Hollywood Community Plan's objective to promote the economic well-being and public convenience by developing new retail, restaurant, and office uses in Hollywood. As noted above, the proposed uses would be located in an area well served by public transit, which would reduce vehicle miles travelled (VMT) and thereby help meet GHG emission goals. The Project would also support the Hollywood Community Plan's policy to provide new employment opportunities within a reasonable commuting distance from residential locations. The Project Site is located within proximity to residential locations, including the multi-family residential buildings to the east of the Project Site.

The Project would also provide 58 bicycle parking spaces (36 long term and 22 short term) and new trees around the building perimeter, which would promote alternative modes of transportation and improve the pedestrian realm. Accordingly, the Project would improve Hollywood's pedestrian environment and support bicycling, recognizing the various alternative modes of transportation available in the immediate vicinity of the Project Site.

In addition, the Project would implement a variety of sustainable features related to water conservation to reduce indoor water use, as set forth in Section II, Project Description, and Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. Furthermore, the Project would be required to reduce indoor water use by at least 20 percent, in accordance with the City of Los Angeles Green Building Code. The Project would also implement Project Design Feature WAT-PDF-1, which includes water conservation measures in excess of code requirements.

The Project would support the growth of the City's economic base by creating jobs in both Project construction and operation. The Project would create commercial opportunities that could serve local employees, generate local tax revenues, and provide new permanent jobs which would also increase the Project area employment population which would support local businesses.

Based on the above, the Project reflects a development that is consistent with the overall vision of the City and SCAG to locate supporting and harmonious uses within one site to create sustainable communities and enhance quality of life throughout the City and the region. As such, the Project would be consistent with, and contribute to, the implementation of local, regional and State land use, mobility, and air quality objectives. Additionally, the Project's significant and unavoidable noise and vibration impacts would only occur during temporary and periodic construction activities, similar to those occurring at development sites in urban areas, particularly within infill locations. As such, the benefits of the Project, as outlined above, would outweigh the effects of the significant and unavoidable temporary construction impacts of the Project. Furthermore, as detailed in Section V, Alternatives, of this Draft EIR, no feasible alternative was identified that would eliminate all of the Project's significant and unavoidable impacts.

3. Significant Irreversible Environmental Changes

CEQA Guidelines Section 15126.2(c) 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 consume a large commitment of natural resources or 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).

The Project's potential impacts related to solid waste are addressed in the Initial Study prepared for the Project, which is included as Appendix A of this Draft EIR. As discussed therein, during construction of the Project, a minimum of 75 percent of construction and demolition debris would be diverted from landfills. In addition, during operation, the Project would provide on-site recycling containers within a designated recycling area for Project occupants to facilitate recycling in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687) and the Los Angeles Green Building Code. In accordance with Assembly Bill (AB) 1826, the Project would also provide for the recycling of organic waste. The Project would adhere to State and local solid waste policies and objectives that further goals to divert waste. Thus, the consumption of non-renewable building materials such as aggregate materials and plastics would be reduced.

b. Water

Consumption of water during construction and operation of the Project is addressed in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. As evaluated therein, given the temporary nature of construction activities, the short-term and intermittent water use during construction of the Project would be less than the net new water consumption estimated for the Project at buildout. During operation, the estimated water demand for the Project would not exceed the available supplies projected by the City of Los Angeles Department of Water and Power (LADWP), as confirmed by the Utility Report prepared for the Project and included as Appendix M of this Draft EIR. Thus, LADWP 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. In addition, the Project would implement a variety of sustainable features related to water conservation to reduce indoor water use, as set forth in Section II, Project Description, and Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. Furthermore, the Project would be required to reduce indoor water use by at least 20 percent, in accordance with the City of Los Angeles Green Building Code. The Project would also implement Project Design Feature WAT-PDF-1, which includes water conservation measures in excess of code requirements. Thus, as evaluated in Section IV.J.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 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. Project consumption of non-renewable fossil fuels for energy use during construction and operation of the Project is addressed in Section IV.C, Energy, of this Draft EIR. As discussed therein, construction activities for the Project would not require the consumption of natural gas but would require the use of fossil fuels and electricity. On- and off-road vehicles would consume an estimated 48,868 gallons of gasoline and approximately 181,883 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.006 percent of the 2025 annual on-road gasoline-related energy consumption and 0.004 percent of the 2025 annual diesel fuel-related energy consumption in Los Angeles County.[1] Furthermore, as detailed in Section IV.C, Energy, of this Draft EIR, a total of approximately 45,025 kWh of electricity is anticipated to be consumed during Project construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. In addition, trucks and equipment used during construction activities would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Further, on-road vehicles (i.e., haul trucks, worker vehicles) would be subject to federal fuel efficiency requirements. Therefore, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Thus, impacts related to the consumption of fossil fuels during construction of the Project 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 (SoCalGas), respectively. Specifically, the Project's electricity and natural gas demand would represent 0.01 and 0.0004 percent, respectively, of LADWP and SoCalGas' projected sales in 2025. In addition, as discussed in Section IV.C, Energy, of this Draft EIR, the Project would comply with 2019 Title 24 standards and applicable 2019 CALGreen requirements. Gasoline and diesel fuel consumption during operation are estimated to be 128,457 gallons and 20,795 gallons, respectively, which would account for 0.004 percent of

[1] *Refer to Appendix D of this Draft EIR for detailed energy calculations.*

gasoline and 0.003 diesel fuel consumption in Los Angeles County. In addition, as noted above, the Project includes a number of features that would reduce the number of VMT, such as increased density, a mixed-use development, and increased destination and transit accessibility.

Therefore, 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 of the CEQA Guidelines. In addition, Project operations would not conflict with adopted energy conservation plans. Refer to Section IV.C, Energy, of this Draft EIR, for further analysis regarding the Project's consumption of energy resources.

d. Environmental Hazards

The Project's potential use of hazardous materials is addressed in the Initial Study for the Project, included as Appendix A of this Draft EIR. As evaluated therein, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used in office and commercial developments. Specifically, operation of the Project would be expected to involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and petroleum products. Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials used during construction and operation would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be reduced to a less than significant level through compliance with these standards and regulations. As such, compliance with regulations and standards would serve to protect against significant and irreversible environmental change that could result from the accidental release of hazardous materials.

e. Conclusion

Based on the above, Project construction and operation would require the irreversible 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 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 from the Project, such changes would be less than significant, and the limited use of nonrenewable resources that would be required by Project construction and operation is justified in light of the benefits of

the Project outlined in Section 2. Reasons Why the Project is Being Proposed, Notwithstanding Significant and Unavoidable Impacts.

4. Growth-Inducing Impacts

CEQA Guidelines Section 15126.2(d) 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 also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.

a. Population

As discussed in Section II, Project Description, of this Draft EIR, the Project would include the construction of new office, retail, and restaurant 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 the Hollywood Community Plan area.

b. Employment

The Project would have the potential to generate indirect population growth in the vicinity of the Project Site as a result of the employment opportunities generated by the Project. During construction, the Project would create temporary construction-related jobs. However, the work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, construction workers would not be expected to relocate to the Project vicinity as a direct consequence of working on the Project. Therefore, given the availability of construction workers, the Project would not be considered growth-inducing from a short-term employment perspective. Rather, the Project would provide a public benefit by providing new employment opportunities during the construction period.

Based on employee generation factors from the City of Los Angeles Department of Transportation (LADOT), the Project is estimated to generate approximately 584 net new employees on the Project Site.[2] Based on a linear interpretation of employment data from the 2020–2045 RTP/SCS, an estimated 1,937,555 employees are projected within the City of Los Angeles in 2025, the Project's buildout year, with 49,586 new employees between 2020 and 2025. The Project's net increase of 584 employees would represent 0.03 percent of the total number of employees in 2025 and 1.18 percent of the growth between 2020 and 2025. Therefore, the Project would not cause an exceedance of SCAG's employment projections contained in the 2020–2045 RTP/SCS.

In addition, the proposed office, restaurant, and retail uses would include a range of full-time and part-time positions that are typically filled by persons already residing in the vicinity of the workplace, and who generally do not relocate their households due to such employment opportunities. Therefore, given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Although it is possible that some of the employment opportunities offered by the Project would be filled by persons moving into the surrounding area, which could increase demand for housing, it is anticipated that most of this demand would be filled by then-existing vacancies in the housing market and others by any new residential developments that may occur in the vicinity of the Project Site. As such, the Project's office, restaurant, and retail uses would be unlikely to create an indirect demand for additional housing or households in the area.

c. Utility Infrastructure Improvements

The area surrounding the Project Site is already developed with a mix of residential, commercial, and industrial uses, and the Project would not remove impediments to growth. The Project Site is located within an urban area that is currently served by existing utilities and infrastructure. While the Project would require local infrastructure upgrades to improve fire flow, and connections to existing water, sewer, electricity, and natural gas lines on-site and in the immediate vicinity of the Project Site, such improvements would be limited to serving Project-related demand, and would not necessitate major local or regional utility infrastructure improvements that have not otherwise been accounted and planned for on a regional level.

[2] *LADOT and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.*

d. Conclusion

Overall, the Project would be consistent with the growth forecast for the City of Los Angeles Subregion 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 VMT. In addition, the Project would not require any major roadway improvements nor would the Project open any large undeveloped areas for new use. Any access improvements would be limited to driveways necessary to provide immediate access to the Project Site, to improve safety and walkability, and/or provide Americans with Disabilities Act (ADA) access. Therefore, direct and indirect growth-inducing impacts would be less than significant.

5. Potential Secondary Effects of Mitigation Measures

CEQA Guidelines Section 15126.4(a)(1)(D) 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 was reviewed. The following provides a discussion of the potential secondary impacts that could occur as a result of the implementation of the proposed mitigation measures, listed by environmental issue area.

a. Cultural Resources

Mitigation Measure CUL-MM-1 requires preparation of a shoring plan prepared by a qualified structural engineer to ensure the protection of the Seward Film Vaults 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 qualified structural engineer shall hold a valid license to practice structural engineering in the State of California and have demonstrated experience specific to rehabilitating historic buildings and applying the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings to such projects. The lead agency shall determine qualification prior to any work being performed. The qualified structural engineer shall submit the shoring plan to the City, establishing baseline conditions to be monitored during construction, prior to issuance of any building permit for the Project. This mitigation measure represents procedural actions and would be beneficial in protecting historical resources near the Project Site. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

b. Noise

Mitigation Measure NOI-MM-1 requires temporary and impermeable sound barriers to be installed prior to the start of earth moving activities along the northern property line of the Project Site between the construction areas and the residential use on the north (Receptor R1), along the eastern property line of the Project Site between the construction area and the residential use east of the Project Site (Receptor R2), and along the southern property line of the Project Site between the construction area and the residential uses south of the Project Site (Receptor R3). The noise and vibration from installation of the temporary sound barrier would be short-term and would be required to comply with the City's noise thresholds as described in Section 3.a.(1) of Section IV.F, Noise, of this Draft EIR. In addition, upon completion of construction, the temporary sound barrier would be removed. As such, implementation of this mitigation measure would not result in adverse long term secondary impacts.

Mitigation Measure NOI-MM-2 states prior to start of construction, the Applicant shall retain the services of a structural engineer to visit the Seward Film Vaults building adjacent to the Project Site to the north to inspect and document (video and/or photographic) the apparent physical condition of the building. In addition, the structural engineer shall establish baseline structural conditions of the building and prepare a shoring design. Prior to construction, the Applicant shall retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a vibration monitoring program capable of recording and documenting the construction-related ground vibration levels at the Seward Film Vaults building during demolition, shoring, and excavation. This mitigation measure represents procedural actions and would be beneficial in protecting historic resources adjacent to the Project Site. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

6. Effects Not Found to Be Significant

CEQA Guidelines Section 15128 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 of Los Angeles determined through the Initial Study that the Project would not have the potential to cause significant impacts related to aesthetics; agriculture and forestry resources; air quality (odors); biological resources; geology and soils; hazards and hazardous materials; hydrology and water quality; land use and planning (division of an established community); mineral resources; noise (airport and airstrip noise); population and housing; public services (schools, parks); recreation, transportation (hazardous design features,

emergency access); utilities and service systems (wastewater, telecommunications, stormwater, solid waste); and wildfires. A summary of the analysis provided in Appendix A for these issue areas is provided below.

a. Aesthetics

(1) Scenic Vistas

The Project Site is located in the highly urbanized Hollywood Community Plan area of the City. Land uses located adjacent to the Project Site include an approximately 64-foot-tall parking structure to the north; a 76-foot-tall office building, multi-family residential buildings, and an above-grade parking structure to the west; a 76-foot-tall office/ commercial building and industrial uses to the south; and multi-family residential buildings to the east. Due to the highly urbanized and built out surroundings, publicly available scenic vistas of any valued visual resources that may exist in the vicinity of the Project Site, including views of the Hollywood Hills would continue to be provided from surrounding streets.

Panoramic views that include the Project Site are available from a variety of vantage points in the Hollywood Hills to the north. As is the case under existing conditions, future views with implementation of the Project would continue to depict a highly urbanized area stretching from Hollywood to downtown Los Angeles and beyond. The building would be a maximum height of 155 feet to the top of the mechanical equipment level; despite the increase in building height and floor area, the Project Site would remain difficult to discern within the greater fabric of the surrounding urban development. In terms of long range views, the Project would not interfere with current public views of the downtown skyline and distant horizon line that is available from the public rights-of-way. Therefore, the Project would not have a substantial adverse effect on a scenic vista. Therefore, the Initial Study concluded impacts would be less than significant.

(2) Scenic Resources Within a State Scenic Highway

The Project Site is not located along a state scenic highway. The nearest eligible state scenic highway is Interstate 210 (I-210) between Interstate 5 and State Route 134, located approximately 11 miles northeast of the Project Site and the nearest designated state scenic highway is State Route 2 (SR-2) north of Interstate 210, which is located approximately 12 miles northeast of the Project Site.[3] Thus, the Project would not substantially damage scenic resources within a designated scenic highway as there are no

[3] *Caltrans, List of Designated and Eligible State Scenic Highways, August 2019.*

scenic highways along the Project Site. Therefore, the Initial Study concluded no impact would occur.

(3) Conflict With Applicable Zoning and Other Regulations Governing Scenic Quality

The Project Site has two zoning designations under the LAMC. The western half of the Project Site along Seward Street is zoned MR1-1 (Restricted Industrial, Height District 1), and the eastern portion of the Project Site along Hudson Avenue is zoned R3-1 (Multiple Dwelling, Height District 1). The Project proposes a General Plan Amendment to the Hollywood Community Plan to amend a portion of the Project Site designated as Medium Residential to Limited Manufacturing to match the balance of the Project Site; a Vesting Zone Change has also been proposed to change the R3 and MR1 zones to M1 to allow for office uses across the entire Project Site; and a Height District Change from Height District No. 1 to Height District No. 2 with a D Limitation to allow for a 4.5:1 FAR. Upon approval of the requested entitlements, the proposed uses would be consistent with those permitted under the new zoning.

With regard to the City's regulations governing scenic quality, local land use plans applicable to the Project Site also include policies governing scenic quality, including the Citywide General Plan Framework Element and the Citywide Design Guidelines.[4] The Project's consistency with the general intent of these plans is briefly discussed below. In addition, although the Hollywood Community Plan does not include specific policies governing scenic quality, the Project's consistency with the recommended actions in the Hollywood Community Plan is also discussed below.

(a) Citywide General Plan Framework

The City of Los Angeles General Plan Framework Element provides direction regarding the City's vision for future development in the City and includes an Urban Form and Neighborhood Design Chapter to guide the design of future development. One of the key objectives of the Urban Form and Neighborhood Design Chapter is to enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm (Objective 5.5). The Project would enhance the built environment in the surrounding neighborhood and upgrade the quality of development by replacing older buildings and providing new landscaping throughout the Project Site. The Project also would provide approximately 34,550 square feet of open space within the Project Site. The building would include terraces that would be located on multiple levels

[4] *The Hollywood Community Plan does not include specific policies governing scenic quality.*

throughout the building and would feature outdoor dining seating (on Level 10), lounge seating, and landscaping.

(b) Citywide Design Guidelines

The Citywide Design Guidelines are intended as performance goals and not zoning regulations or development standards. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case.[5] As detailed below, the Project would not conflict with the applicable Citywide Design Guidelines.

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

The Project's design would elevate the pedestrian experience in and around the Project. The ground floor of the building would feature a retail space and restaurant uses which open fully onto the sidewalk. The lobby is open to Romaine Street. The Project would include new landscaping along the sidewalks adjacent to the Project Site, further activating the streetscape and improving the pedestrian environment. In addition, the Project would include low-level exterior lights adjacent to the building and along pathways that would serve to enhance the safety of pedestrians at night. These Project elements would promote a safe, comfortable, and accessible pedestrian experience for all.

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

The Project would minimize the appearance of parking entries and loading by integrating access into the overall design. The sole driveway to the parking structure is located on Hudson Avenue and the loading space is located inside the parking garage. These were located so as to minimize conflict with other modes of travel. All of the parking areas are to be located within the parking structure, which is fully enclosed and mechanically ventilated. In addition, as previously described, the Project would include new landscaping along the Project Site perimeter to enhance the pedestrian experience.

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

As noted above, the Project's design would elevate the pedestrian experience in and around the Project Site by providing ground floor retail and restaurant uses, which are fully

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[5] *City of Los Angeles Department of City Planning, Commercial Citywide Design Guidelines, Pedestrian-Oriented/Commercial and Mixed-Use Projects, May 2011, p. 5; and Residential Citywide Design Guidelines, Multi-Family Residential & Commercial Mixed-Use Projects, May 2011, p. 5.*

open onto the sidewalk, and new landscaping. In addition, the design of the ground floor articulation around the Project Site is pedestrian-oriented. The various ground floor uses are located along the street frontage to activate the streetscape and welcome pedestrians. The remainder of the ground floor would include open space and landscaped features that would activate the streetscape and be welcoming to passersby. The high quality design and landscaped edges would create a pleasant streetscape experience and reduce visual clutter.

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

The Project is designed to be a welcoming, sophisticated, and authentic addition to the neighborhood as well as a new, iconic presence for the Hollywood Media District. The Project's simple palette of materials including concrete, metal, and glass, the industrial details, and the massing volumes of the Project directly link the design to buildings found throughout the district. The ground floor retail and passage further reinforce the vibrancy of the immediate context.

Guideline 5: Express a clear and coherent architectural idea.

The Project's design incorporates strong urban principles to define and enhance its location within Hollywood. The architecture includes bold yet sympathetic massing techniques to ensure a contextual and contemporary addition to the Project Site. Each major step in building mass offers opportunities to incorporate large, planted terraces at multiple levels, reinforcing the legibility of the building form and providing visual amenity from street level, as follows:

The lower volume, consisting of floors one through four, would sit back from Seward Street to create a generous publicly accessible plaza in front of the building, improving the pedestrian experience at the ground level. The plaza would be enhanced by a tiered auditorium stair, incorporating seating and planting that offers a place for the public to enjoy. The program at the ground level would include a restaurant at the corner of Seward and Romaine Streets that will further activate this plaza during the day and night. Additional retail outlets are proposed along the Romaine Street frontage to offer smaller units for local and neighborhood businesses.

The middle volume, consisting of floors five through seven, would set back from the residential properties to the north and Hudson Avenue to respect adjacent building scale and sightlines from the neighboring properties. As a counterpoint, the volume would project over the public plaza to form a high-level canopy that addresses the street and defines this prominent urban corner.

The upper volume, consisting of floors eight through ten, would set back further from Romaine Street and Hudson Avenue to form a crown to the building. A restaurant on the top floor would further activate the corner of Seward and Romaine to ensure the public can benefit from the elevated experience that this building will offer and take advantage of commanding views across the City.

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

The Project's terraces would help support the City's intent to increase the area and quality of open spaces in this urbanized area of Los Angeles. The Project would include many design elements that would improve the public environment and also extend its ground floor plaza in front of the building as quasi-public space that would also contribute to a more comfortable, safe, and pleasant pedestrian atmosphere.

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

The Project would develop one commercial building that would include office, retail, and restaurant uses. The building and arrangement of uses would enhance pedestrian activity around the Project Site, as detailed above. The Project would also include lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into the building.

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

The Project Site is located in an urbanized area and is currently developed with a restaurant, studio and production space, and surface parking. There are no natural resources or features on the Project Site. As discussed further below, there is one Hollywood juniper located on the Project Site that would be removed as part of the Project. The Hollywood juniper is not protected under the City's Protected Tree Ordinance. There are also giant birds of paradise adjacent to the buildings along Seward Street and Romaine Street that would be removed as part of the Project, but these do not meet the definition of a tree.[6] In addition, there are no City right-of-way trees adjacent to the Project Site. In accordance with the Department of City Planning's policy, the on-site tree to be removed would be replaced on a 2:1 basis.

[6] *The arboricultural industry's Best Management Practices define a tree as "a woody perennial plant with single or multiple trunks, which typically develops a mature size of over several inches in diameter, has a raised canopy, and is 10 feet or more in height." Conversely, a shrub is a smaller, usually multi-stemmed, and has a low canopy. Refer to the Tree Survey included as Appendix IS-1 of the Initial Study.*

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

The building's east-west orientation would be optimal for minimizing heat gain and the cantilevering elements provide shading to the glazing below. Floor to ceiling glazing maximizes natural light and views out while high performance glazing will be used to reduce solar heat gain.

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

As discussed further below, consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of an infiltration system, capture and use system, biofiltration/bioretention system, or a combination of these as required by the City's LID Manual.

(c) Hollywood Community Plan

As noted above, the Hollywood Community Plan does not include specific policies governing scenic quality. However, the Hollywood Community Plan includes a recommendation that new power lines should be placed underground. The Project does not propose new overhead connections to power lines.

(d) Conclusion

Based on the above, the Project would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, the Initial Study concluded impacts would be less than significant.

(4) Light and Glare

The existing ambient nighttime lighting environment within the Project Site and vicinity is typical of a developed, urban environment where the primary nighttime lighting sources include interior light spillage from buildings, vehicle headlights along roadways and in parking areas, signage, street lamps, and security/parking lighting. Glare sources within the Project Site and vicinity include glass and metal, vehicle and building surfaces. The Project would introduce new sources of light and glare that are typically associated with commercial uses, including architectural lighting, signage lighting, interior lighting, and security and wayfinding lighting. Construction of the Project also has the potential to generate light and glare. The surrounding properties are generally multi-family residences, offices, and commercial buildings with views of the Project Site. The topography of the surrounding adjacent areas varies, providing different viewing aspects to the Project Site.

Provided below is an analysis of the Project's potential impacts related to light and glare during construction and operation.

(a) Construction

The Project's construction hours would comply with the LAMC, which provides that construction activities be limited to the hours of 7:00 A.M. to 9:00 P.M. Monday to Friday and 8:00 A.M. to 6:00 P.M. on Saturday. Pursuant to the LAMC, no construction activities are permitted on Sundays. Given the nature of the construction labor force (with a typical eight-hour workday beginning at 7:00 A.M.), the majority of Project construction would occur during daylight hours. However, there is a potential that construction activities could require the limited use of artificial lighting during the winter season when daylight may not be sufficient earlier in the day. Outdoor lighting sources such as floodlights, spot lights, and/or headlights associated with construction equipment and hauling trucks typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of Project construction. Further, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. In addition, construction lighting, while potentially bright, would be highly focused on the particular area undergoing work. Thus, with adherence to existing LAMC regulations, construction of the Project would not create a new source of substantial light which would adversely affect day or nighttime views in the area. Therefore, the Initial Study concluded impacts would be less than significant.

Daytime glare could potentially accompany construction activities if reflective construction materials were positioned in highly visible locations where glare conditions (e.g., orientation and presence of glare-sensitive uses) could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities within each area of the Project Site. In addition, large surfaces that are usually required to generate substantial glare are typically not an element of construction activities. Furthermore, construction activities would be screened by temporary fencing and surrounding perimeter landscaping. As such, construction of the Project would not create a new source of substantial glare which would adversely affect day or nighttime views in the area. Therefore, the Initial Study concluded impacts would be less than significant.

(b) Operation

Exterior lighting along the public areas would include pedestrian-scale (i.e., lower to the ground, spaced closer together) fixtures. Exterior lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the Project Site. Project lighting would be

designed to minimize light trespass from the Project Site and would comply with all LAMC requirements. Night lighting at the Project Site would be low profile and at the necessary intensity to provide a safe walkable environment along walking paths. Roof terrace lighting would be of similar light levels, directed downward towards walkable surfaces, and shielded from view of the adjacent residential neighbors. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would require approval from the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on sidewalks and roadways while minimizing light and glare on adjacent properties.

The proposed lighting sources would be similar to other lighting sources on the Project Site and in the Project Site vicinity and would not generate artificial light levels that are out of character with the surrounding area. Any new outdoor lighting provided by the Project would be low-level and would not result in a substantive change in ambient illumination levels over existing conditions. In addition, outdoor security and architectural lighting would be shielded and directed onto building surfaces and towards the interior of the Project Site to avoid light spillover onto sensitive uses. Project lighting would also meet all applicable LAMC lighting standards. As required by LAMC Section 93.0117(b), exterior light sources and building materials would not cause more than two (2) foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units; an elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas, or any other property containing a residential unit or units.

With regard to glare, daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. Sun reflection can also occur with reflected light from parked vehicles. In general, building materials would include metal panels with projecting fins, glazed guard rails, metal profiles, and precast concrete elements. The Project‘s exterior cladding and fins are a dark color which absorb reflection and reduce glare. In addition, all parking would be provided in a fully enclosed parking garage. The garage floor overhangs and exterior cladding cut off the sun angle and sunlight penetration, throwing most of the parking floors into shade. The vertical fins also dramatically reduce sun penetration (and therefore heat gain) further reducing – if not eliminating – reflected glare from car surfaces, especially potential glare seen from the streets below. As such, there would be limited potential from glare associated with parked vehicles.

Based on the above, Project operation would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, the Initial Study concluded impacts would be less than significant.

b. Agricultural and Forest Resources

The Project Site is located in an urbanized area of the City of Los Angeles and is currently developed with a restaurant, studio and production space, and surface parking. The Project Site and surrounding area are not zoned for agricultural or forest uses, and no agricultural or forest lands occur on-site or in the Project area. Therefore, the Initial Study concluded that no impacts would occur.

c. Air Quality

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

With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses. In addition, on-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and therefore would not result in substantially adverse odor impacts.

In addition, the construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403 regarding visible emissions violations.[7] 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.[8] Therefore, with compliance with existing regulatory requirements, the Project would not create odors that would adversely affect a substantial number of people.

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[7] *SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed April 13, 2021.*

[8] *SCAQMD, Rule 402, Nuisance, adopted May 7, 1976.*

Based on the above, the Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Therefore, the Initial Study concluded impacts would be less than significant.

d. Biological Resources

The Project Site is located in an urbanized area and is developed with a restaurant, studio and production space, and surface parking. Limited ornamental landscaping exists on-site. Due to the developed nature of the Project area, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Thus, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (USFWS). There are no riparian or other sensitive natural communities, or federally protected wetlands as defined by Section 404 of the Clean Water Act on the Project Site or in the surrounding area. In addition, there are no established native resident or migratory wildlife corridors on the Project Site or in the vicinity. Accordingly, development of the Project would not impact any regional wildlife corridors or native wildlife nursery sites. Furthermore, no water bodies that could serve as habitat for fish exist on the Project Site or in the vicinity. As the USFWS database of conservation plans and agreements does not show any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans applicable to the Project Site, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans.

As discussed above, landscaping within the Project Site is limited. There is one Hollywood juniper located on the Project Site that would be removed as part of the Project. The Hollywood juniper is not protected under the City's Protected Tree Ordinance. There are also giant birds of paradise adjacent to the buildings along Seward Street and Romaine Street that would be removed as part of the Project, but these do not meet the City's definition of a tree.[9] In addition, there are no City right-of-way trees adjacent to the Project Site. In accordance with the Department of City Planning's policy, the on-site tree to be removed would be replaced on a 2:1 basis.

The Project would comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting season to ensure that significant impacts

[9] *The arboricultural industry's Best Management Practices define a tree as "a woody perennial plant with single or multiple trunks, which typically develops a mature size of over several inches in diameter, has a raised canopy, and is 10 feet or more in height." Conversely, a shrub is a smaller, usually multi-stemmed, and has a low canopy. Refer to the Tree Survey included as Appendix IS-1 of the Initial Study.*

to migratory birds would not occur. Compliance with the MBTA would ensure that impacts would be less than significant. In addition, in accordance with LAMC requirements, new trees would be planted within the Project Site. The planting of new tree species would be selected to enhance the pedestrian environment, convey a distinctive high quality visual streetscape, and complement trees in the surrounding area. The Project Site is located in an urbanized area and is currently developed with a restaurant, studio and production space, as well as surface parking. As also previously discussed, landscaping within the Project Site is limited, consisting of one ornamental tree and shrubs and the Project Site does not support any habitat or natural community[10,11] No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.[12] Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan. Therefore, the Initial Study concluded that impacts to biological resources would be less than significant.

e. Geology and Soils (including Paleontological Resources)[13]

The Project Site is not located within a currently established Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards or a City-designated Fault Rupture Study Area. In addition, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Therefore, as concluded in the Initial Study, since the potential for surface rupture due to faulting occurring beneath the Project Site is considered low, impacts would be less than significant.

In addition, the Project would be constructed in accordance with the most current Los Angeles Building Code regulations and the recommendations of the design level geotechnical investigation for the Project. As such, the Initial Study concluded that impacts related to strong seismic ground shaking would be less than significant.

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[10] *City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5533012025, 5533012013, 5533012012, and 5533012011, http://zimas.lacity.org/, accessed April 13, 2021.*

[11] *United States Environmental Protection Agency, NEPAssist, https://nepassisttool.epa.gov/nepassist/nepamap.aspx, accessed April 13, 2021.*

[12] *California Department of Fish and Wildlife, California Natural Community Conservation Plans, April 2019.*

[13] *In January 2018, OPR 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. Prior to the release of the revised thresholds, the question or threshold related to potential impacts to paleontological resources was considered under cultural resources. This threshold has since been moved and is now addressed under geology and soils.*

The Project Site is not located in an area that has been identified by the State or the City as being potentially susceptible to liquefaction. The Geotechnical Investigation included as Appendix IS-2 of the Initial Study found that due to the depth of the historical highest groundwater level, the type of soils underlying the Project Site, and the liquefaction mapping by the City and State, the Project Site would not be susceptible to liquefaction during an earthquake event. As such, the Initial Study concluded that impacts associated with liquefaction would be less than significant.

The Project Site and surrounding area are fully developed and characterized by relatively flat topography. The Project Site is not located in a landslide area as mapped by the State or the City. Further, the development of the Project does not propose substantial alteration to the existing topography. As such, the Initial Study concluded that impacts from landslides and lateral spreading would be less than significant.

Project construction activities, including grading, excavation, and other construction activities, have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. As discussed in the Initial Study, with compliance with regulatory requirements that include the implementation of Best Management Practices (BMPs), impacts related to soil erosion would be less than significant. The Project would also be required to comply with the City's LID ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Regarding soil erosion during Project operations, the potential is negligible since the Project Site would be developed and landscaped, which would prevent soil erosion. Therefore, the Initial Study concluded impacts would be less than significant.

The Project Site is underlain by up to 4 feet of artificial fill, with Quaternary-age alluvial deposits below. The artificial fill is characterized as moist and firm. It generally consists of dark brown clay. The fill is likely the result of past grading or construction activities at the Project Site. The deeper Quaternary-age alluvial deposits consist of dark brown to brown and reddish-brown interbedded clay, silt, and sand of varying composition. The alluvial soils are characterized as slightly moist to very moist, firm to hard or medium dense to very dense. Based on the depth of excavation and low expansion range of the onsite geologic materials, the Geotechnical Investigation, included as Appendix IS-2 of the Initial Study, concluded that the proposed structure would not be prone to the effects of expansive soils. In addition, the Project would not increase the expansion potential of these soils. Therefore, the Initial Study concluded that impacts related to unstable and expansive soils would be less than significant.

The Project's wastewater demand would be accommodated via connections to the existing wastewater infrastructure and no septic tanks are proposed. Therefore, the Initial Study concluded no impact would occur..

With respect to paleontological resources, the Project Site is located within an urbanized area and has been subject to repeated grading and development in the past. Thus, surficial paleontological resources that may have existed at one time have likely been previously disturbed. In addition, a paleontological records search conducted by the Natural History Museum for the Project Site, included in Appendix IS-3 of the Initial Study, indicates there are no previously encountered fossil vertebrate finds located within the Project Site. Nevertheless, according to the records search, vertebrate fossil localities have been discovered nearby from the same sedimentary deposits that occur on the Project Site. However, the City has established a standard condition of approval to address inadvertent discovery of paleontological resources. Should paleontological resources be inadvertently encountered, this condition of approval provides for temporary halting construction activities near the encounter so the find can be evaluated. A paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum and the Department of City Planning. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements. Therefore, the Initial Study concluded impacts would be less than significant.

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 for office and commercial uses. Specifically, operation of the proposed uses would be expected to involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and petroleum products. Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations.

The Phase I ESA, included as Appendix IS-4 of the Initial Study, included a review of environmental records for the Project Site and a site reconnaissance to identify potential on-site hazards. As discussed in the Phase I ESA, based on available historical sources, the Project Site underwent separate courses of development. The Project Site consists of

four contiguous parcels which are approximately 0.78 acres in total size. The earliest historical resource, a Sanborn map from 1919, indicated development of portions of the Project Site for residential use. The lack of historical data sources for the Project Site dating back to first developed uses represents historical data source failure. However, the Phase I ESA assumes that prior to 1919, the subject property would have been developed for residential uses, if not undeveloped. The northeast portion of the Project Site (1013 North Hudson Avenue) currently has a parking lot that was developed in 1985. The east portion of the Project Site (1007 North Hudson Avenue) currently has a parking lot that was developed in 1959. The southeast portion of the Project Site (1003 North Hudson Avenue; 6551—6561 Romaine Street) currently has a parking lot that was developed in 1986. The western half of the Project Site (1000 and 1006 Seward Street; 6565—6575 Romaine Street) was developed in 1937 with the existing restaurant (1006 Seward) and commercial building that houses the media production studio (1000 Seward). The existing, attached northeast structure (6565 Romaine) was developed in 1960 as a radio equipment repair shop.

During the site reconnaissance visit, no evidence of hazardous substances, aboveground storage tanks (ASTs) or underground storage tanks (USTs), drums, stains or corrosion, unidentified substance containers, wastewater discharge systems, stressed vegetation, unusual odors, or pits, ponds, or lagoons were identified on-site. Floor drains were observed on-site, but no staining or hazardous materials were observed in their vicinity. No pole or pad mounted transformers or polychlorinated biphenyls (PCB) containing equipment were observed at the Project Site. In the event an undocumented UST is identified on-site, it would be appropriately documented and removed according to Los Angeles Fire Department (LAFD) regulations.

Based on the age of the existing buildings on-site, there is a possibility that asbestos-containing materials (ACM) and lead-based paint (LBP) may be encountered during construction. In the event any suspect ACM or LBP is found, the Project would adhere to all federal, State, and local regulations prior to their removal. These regulations include, but are not limited to, the Toxic Substances Control Act (TSCA), the Resource Conservation and Recovery Act (RCRA), 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 ACM and LBP to less than significant levels.

According to the Geotechnical Investigation, the Project Site is located in a Methane Buffer Zone identified by the City. However, as discussed in detail in the Methane Report included as Appendix IS-5 of the Initial Study, the Project Site does not contain significantly elevated concentrations of methane or other light hydrocarbons. The Methane Report determined that based on the levels encountered and implementation of applicable

Los Angeles Department of Building and Safety (LADBS) requirements, there would not be unacceptable health risk to occupants. In addition, adherence to standard construction safety measures, as well as compliance with California Occupational Safety and Health Act (OSHA) safety requirements, would serve to reduce the risk in the event that elevated levels of gases are encountered during grading and construction. In addition, no recognized environmental concerns (RECs) or historic recognized environmental concerns (HRECs) were identified on the Project Site.

Based on the above, with compliance with regulatory requirements, 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 into the environment. Thus, as concluded in the Initial Study, impacts related to the release of hazardous materials into the environment would be less than significant.

There is one existing school within 0.25 mile of the Project Site. Hubert Howe Bancroft Middle School is located approximately 0.21 mile southeast of the Project Site at 929 North Las Palmas Avenue. As previously discussed, 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 office developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used within and in the vicinity of the Project Site. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Specifically, the Project does not involve the development of industrial or other uses that would emit large amounts of chemicals or acutely hazardous materials. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations including, but not limited to, federal and State Occupational Safety and Health Act requirements. As such, the use of such materials would not create a significant hazard to nearby schools. Therefore, the Initial Study concluded impacts would be less than significant.

The Phase I ESA for the Project Site obtained a database search report that documents findings of various federal, State, and local regulatory database searches regarding properties with known or suspected releases of hazardous materials. Based on the database records search, five USEPA identification numbers associated with 0.375 tons of latex waste were issued to It's a Laugh Productions at 6565 Romaine Street. Based on the minor quantities and type of waste generated, this listing is not expected to represent a significant environmental concern for the Project Site. Several industrial waste

permits related to wastewater discharges were also issued for businesses at 1006 Seward Street. Based on the nature of the businesses (food preparation), the industrial waste generated by the former and current tenants would not represent a significant environmental concern for the Project Site. Therefore, based on the above, the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard. Thus, impacts related to creating a hazard to the public or the environment would be less than significant.

The Project Site is not located within an airport land use plan or within 2 miles of a public airport or public use airport. The nearest airport is the Hollywood-Burbank Airport located approximately 7 miles north of the Project Site. As such, the Initial Study concluded that there would be no impacts related to airport hazards.

According to the Safety Element of the City of Los Angeles General Plan, nearest emergency/disaster routes to the Project Site are Santa Monica Boulevard (0.1 mile) to the north and Beverly Boulevard (0.8 mile) to the south.[14] While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with the Project's Construction Traffic Management plan prepared pursuant to Project Design Feature TR-PDF-2 that would be implemented to ensure adequate circulation and emergency access. In addition, while the Project would generate traffic in the vicinity and result in some modifications to site access, the Project would comply with LAFD access requirements and would not impede emergency access within the vicinity. Thus, as discussed in the Initial Study, impacts related to implementation of an adopted emergency response plan would be less than significant.

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[15] or within a City-esignated fire buffer zone.[16] Furthermore, the Project would be developed and rehabilitated in accordance with LAMC requirements pertaining to fire safety. Additionally,

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[14] *City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 1996, Exhibit H, Critical Facilities and Lifeline Systems.*

[15] *City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5533012025, 5533012013, 5533012012, and 5533012011, http://zimas.lacity.org/, accessed April 13, 2021. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.*

[16] *City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.*

the proposed office and commercial uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Impacts would be less than significant. Therefore, the Project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. As such, the Initial Study concluded that there would be no impacts related to wildland fires.

g. Hydrology and Water Quality

During construction of the Project, particularly during the grading and excavation phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use, and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. Therefore, Project-related construction activities could potentially result in adverse effects on water quality. However, in accordance with the requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) adhering to the California Stormwater Quality Association BMP Handbook. The SWPPP would set forth BMPs to be used during construction for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction.

In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Prior to the issuance of a grading permit, the Applicant would be required to provide the City with evidence that a Notice of Intent has been filed with the State Water Resources Control Board to comply with the Construction General Permit. With compliance with these existing regulatory requirements, impacts to water quality during construction would be less than significant, and no mitigation measures would be required.

Operation of the Project would introduce sources of potential stormwater pollution that are typical of commercial and office uses (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with circulation areas). Stormwater runoff from precipitation events could potentially carry urban pollutants into municipal storm drains. However, the Project would implement BMPs for managing stormwater runoff in accordance with the current City LID Ordinance requirements. The City's LID Ordinance sets the order of priority for selected BMPs. This order of priority is infiltration systems, stormwater capture and use, high efficiency biofiltration/bioretention systems, and any

combination of any of these measures. The Project would include the installation of an infiltration system, capture and use system, biofiltration/bioretention system, or a combination of these as required by the City's LID Manual. With compliance with these existing regulatory requirements, operation of the Project would not result in discharges that would cause regulatory standards to be violated. Impacts on water quality during operation would be less than significant.

As provided in the Geotechnical Investigation included as Appendix IS-2 of the Initial Study, groundwater was encountered in borings at depths of 18 and 27 feet below ground surface (bgs). Anticipated excavation depths up to 45 feet bgs would occur to provide for the new subterranean parking levels. Considering the depth to groundwater encountered and the depth of the excavation, temporary dewatering will be required during construction. Groundwater discharges from dewatering operations can contain high levels of fine sediments, which if not properly treated, exceed NPDES requirements. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all relevant NPDES requirements related to construction and discharges from dewatering operations. Thus, construction of the Project would result in less-than-significant impacts related to groundwater and would not substantially deplete groundwater supplies in a manner that would result in a net deficit in aquifer volume or lowering of the local groundwater table. Therefore, the Initial Study concluded impacts would be less than significant.

With regard to groundwater recharge, the percolation of precipitation that falls on pervious surfaces is variable, depending on the soil type, condition of the soil, vegetative cover, and other factors. The Project Site is currently approximately 100 percent impervious. With implementation of the Project, impervious surfaces would comprise approximately 82 percent of the Project Site.[17] As part of the Project, a stormwater system would be implemented wherein the stormwater would discharge to an approved discharge point in the public right-of-way and not result in infiltration of a large amount of rainfall that would affect groundwater hydrology, including the direction of groundwater flow. In addition, since the Project Site is predominately impervious under existing conditions and would continue to be so upon completion of the Project, the amount of rainfall infiltration that would occur on the Project Site would be nominal and would not contribute to groundwater recharge. Thus, the Project would not interfere substantially with groundwater recharge such that there would be a net deficit in the aquifer volume or lowering of the local groundwater table. Therefore, the Initial Study concluded impacts would be less than significant.

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[17] *The Water Resources Report included as Appendix IS-6 of the Initial Study incorrectly states that the amount of impervious surfaces following implementation of the Project would be 100 percent. Refer to the Revised Water Resources Report included as Appendix M of this Draft EIR.*

Construction activities associated with the Project, which would involve grading, have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. However, as discussed above, in accordance with NPDES requirements the Project would implement a SWPPP that would specify BMPs and erosion/siltation control measures to be used during construction to manage runoff flows so that runoff would not impact off-site drainage facilities and receiving waters. In addition, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Therefore, the Initial Study concluded impacts would be less than significant.

At buildout of the Project, the Project Site would be comprised of approximately 82 percent impervious areas. While there would be an incremental decrease in the imperviousness of the Project Site, this decrease would not significantly increase the amount of runoff from the Project Site. Specifically, the expected total increase in runoff within the Project Site would be 0.0236 cfs. Furthermore, a projected increase of 0.25 cfs would be discharged onto Willoughby Avenue and Las Palmas Avenue. As the increase in runoff in Willoughby Avenue and Las Palmas Avenue represents an increase of less than 1 percent of the full-flow capacity of the downstream storm drain pipe, it is unlikely that this increase would cause flooding in Willoughby Avenue and Las Palmas Avenue. Therefore, the Initial Study concluded impacts would be less than significant.

As part of LID compliance for the Project to manage post-construction stormwater runoff, the Project would include the installation of an infiltration system, capture and use system, biofiltration/bioretention system, or a combination of these as required by the City's LID Manual. As discussed in the Water Resources Report, the existing Project Site does not have any structural or LID BMPs to treat or infiltrate stormwater. Therefore, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions and would serve to prevent on-site flooding and nuisance water on the Project Site. As such, the Initial Study concluded impacts would be less than significant.

Based on the above, through compliance with all applicable NPDES requirements, including preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading regulations, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion, siltation, or on-site or off-site flooding would occur. Therefore, the impact would be less than significant.

The Project Site is not located within a 100-year flood plain as mapped by the Federal Emergency Management Agency (FEMA) or by the City. However, the Safety Element of the City's General Plan does map the Project Site as being located within a

potential inundation area.[18] Specifically, the Project Site is located within the potential inundation area for the Hollywood Reservoir, which is held by the Mulholland Dam.[19] The Mulholland Dam is located in the Hollywood Hills approximately 2.0 miles north of the Project Site. Although the Project Site is mapped within an inundation zone for the dam, catastrophic failure of this dam is expected to be a very unlikely event in that dam safety regulations exist and are enforced by the Division of Safety of Dams, Army Corp of Engineers, and the Department of Water Resources. Inspectors would require dam owners to perform work, maintenance or implement controls if issues are found with the safety of the dam. The dams are under continuous monitoring for safety against failure and, therefore, the potential for seismically-induced flooding to affect the Project Site due to dam failure is low. Therefore, the risk of flooding from inundation by dam failure would be low.

The Project Site is located approximately 11 miles northeast of the Pacific Ocean and the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami.[20] Therefore, no tsunami or tsunami events would be expected to impact the Project Site. Additionally, there are no standing bodies of water on or near the Project Site that could result in a seiche. Therefore, the Initial Study concluded impacts would be less than significant.

h. Land Use and Planning

The Project Site is located in a highly urbanized area characterized by a mixture of low- and mid-rise buildings occupied by a mix of uses. The Project would replace the existing surface parking lot and two one-story buildings with a new infill mixed-use development. All proposed development would occur within the boundaries of the Project Site as it currently exists and the Project does not propose a freeway or other large infrastructure that would divide a community. Impacts related to the physical division of an established community would be less than significant.

i. Mineral Resources

No mineral extraction operations currently occur on the Project Site. The Project Site is located within an urbanized area and has been previously disturbed by development. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a

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[18] *City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G, p. 59.*

[19] *City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G, p. 59.*

[20] *City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G, p. 59.*

mineral producing area as classified by the California Geologic Survey. The Project Site is also not located within a City-designated oil field or oil drilling area. Therefore, the Initial Study concluded that no impacts related to mineral resources would occur.

j. Noise

The Project Site is not located within the vicinity of a private airstrip or within 2 miles of a public airport or public use airport. The nearest airport is the Hollywood–Burbank Airport located approximately 7 miles north of the Project Site. Therefore, the Project would not expose people residing or working in the Project area to excessive airport noise. As such, the Initial Study concluded impacts would be less than significant.

k. Population and Housing

The Project would include the construction of new office, retail, and restaurant 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 the Hollywood Community Plan area. The Project would have the potential to generate indirect population growth in the vicinity of the Project Site as a result of the employment opportunities generated by the Project.

Based on employee generation factors from the LADOT, the Project is estimated to generate approximately 584 net new employees on the Project Site.[21] Based on a linear interpretation of employment data from the 2020–2045 RTP/SCS, an estimated 1,937,555 employees are projected within the City of Los Angeles in 2025, the Project's buildout year, with 49,586 new employees between 2020 and 2025. The Project would represent 0.03 percent of the total number of employees in 2025 and 1.18 percent of the growth between 2020 and 2025. Therefore, the Project would not cause an exceedance of SCAG's employment projections contained in the 2020–2045 RTP/SCS.

Furthermore, as discussed previously, while construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, project-related construction workers would not be expected to relocate their household's place of residence as a consequence of working on the Project and, therefore, the Project would not be considered growth-inducing from a short-term employment perspective.

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[21] *LADOT and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.*

In addition, as discussed previously, it is anticipated that some of the demand for the Project's 584 estimated employees during Project operations would be filled by then-existing vacancies in the housing market and others by any new residential developments that may occur in the vicinity of the Project Site. Therefore, given that the Project would not directly contribute to 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, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Therefore, the Initial Study concluded impacts would be less than significant.

The Project Site is currently occupied by studio, production, and restaurant uses and no housing currently exists on the Project Site. The Project would not displace any existing people or housing. Therefore, the Initial Study concluded no impact would occur.

I. Public Services

(1) Schools

The Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of students within the service area of LAUSD from the introduction of a residential population. In addition, the number of students that may be indirectly generated by the Project that could attend LAUSD schools serving the Project Site would not be anticipated to be substantial because not all employees of the Project are likely to reside in the vicinity of the Project Site. Furthermore, pursuant to Government Code Section 65995, the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of the Project's building permit. Pursuant to Government Code Section 65995, the payment of these fees fully removes Project-related school impacts. As such, impacts would be less than significant.

(2) Parks

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create 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. Furthermore, the Project proposes on-site open space amenities such as landscaped terraces with seating for use by employees and outdoor customers, reducing the likelihood employees would use local parks. Specifically, the Project would provide approximately 34,550 square feet of open space (500 square feet of which would be a publicly accessible ground floor plaza). Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks or the need for new or physically altered parks. Impacts would be less than significant.

(3) Libraries

The Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of residents within the service population of the John C. Fremont Branch Library, the nearest library to the Project Site. In addition, Project employees would have internet access to LAPL and other web-based resources, decreasing the demand on library facilities. Furthermore, as Project employees would be more likely to use library facilities near their homes during non-work hours and given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library services. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities or the need for new or physically altered library facilities. Impacts would be less than significant, and no mitigation measures are required.

m. Recreation

As discussed above, 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. The Project would also provide on-site open space. Specifically, the Project would provide approximately 34,550 square feet of open space (500 square feet of which would be a publicly accessible ground floor plaza area). 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. The impact on parks and recreational facilities would be less than significant.

n. Transportation

The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. The Project does not include any proposed modifications to the street system or any dangerous design features. In addition, the Project would not result in incompatible uses as the proposed uses are consistent with the commercial and office uses in the Project vicinity. Furthermore, the design and implementation of new driveways would comply with the City's applicable requirements, including emergency access requirements set forth by the LAFD. The Project design would also be reviewed by LADBS and the LAFD during the City's plan review process to ensure all applicable requirements are met. Therefore, no impacts would occur.

With respect to emergency access, while it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. In addition, appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Further, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the Project would not result in inadequate emergency access. Impacts would be less than significant.

o. Utilities and Service Systems

(1) Wastewater

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Water Reclamation Plant (HWRP). The HWRP has a capacity of 450 million gallons per day (mgd),[22] and current

[22] *LASAN, Water Reclamation Plants, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=vm8qwyj80_4&_afrLoop=18606279438697733#!, accessed April 13, 2021.*

average wastewater flows are at approximately 275 mgd.[23] Accordingly, the remaining available capacity at the HWRP is approximately 175 mgd. The Project would generate a net increase in wastewater flow from the Project Site of approximately 31,307 gpd, or approximately 0.03 mgd. The Project's increase in average daily wastewater flow of 0.03 mgd would represent approximately 0.02 percent of the current estimated 175 mgd of remaining available capacity at the HWRP. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the HWRP. Furthermore, wastewater flows would be typical of office and commercial developments. No industrial discharge into the wastewater system would occur. Discharge of effluent from the HWRP into Santa Monica Bay is also regulated by permits issued under the NPDES and is required to meet LARWQCB requirements. As LA Sanitation & Environment (LASAN) monitors the treated wastewater, wastewater treated at the HWRP would not exceed wastewater treatment requirements of LARWQCB and new or expanded treatment facilities would not be required.

Sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. As discussed in the Wastewater Report, there is currently an existing 12-inch vitrified clay pipe (VCP) sewer line in Seward Street flowing south, and an 8-inch VCP sewer line in Hudson Avenue flowing south that would connect to a network of sewer lines and ultimately convey wastewater to the HWRP. This sewer line in Seward Street has a capacity of 3.77 cubic feet per second (cfs) (2,436,445 gpd) and the sewer line in Hudson Avenue has a capacity of 0.90 cfs (581,645 gpd). The Project's net increase in wastewater generation would be approximately 31,307 gpd. The Bureau of Sanitation stated that the sewer system is able to accommodate up to 37,477 gpd of wastewater from the Project to the 12-inch sewer main in Seward Street and the 8-inch sewer main in Hudson Avenue (with 75 percent of flow discharging to Seward and 25 percent of flow discharging to Hudson). Thus, the Project's maximum net increase in sewage generation discharging to Seward Street and Hudson Avenue are approximately 24,663 gpd and 8,221 gpd, respectively. This represents approximately 1.0 percent of the 12-inch pipe's capacity, and 1.4 percent of the 8-inch pipe's capacity. As required by LAMC Section 64.15, the Project would submit a Sewer Capacity Availability Request to LASAN to evaluate the capability of the existing wastewater system and obtain approval to discharge the Project's wastewater to the existing 12-inch sewer line in Seward Street and the 8-inch line in Hudson Avenue. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for the Project during the Project's permitting process. In addition, Project-related sanitary sewer connections and

[23] *LASAN, Water Reclamation Plants, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=vm8qwyj80_4&_afrLoop=18606279438697733#!, accessed April 13, 2021.*

on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Therefore, the Project would not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained.

Based on the above, the Project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Therefore, impacts would be less than significant.

(2) Stormwater

The Project would implement capture and reuse or biofiltration to reduce stormwater pollution on the Project Site in accordance with the City's LID requirements. In addition, specific on-site improvements would include the installation of an infiltration system, capture and use system, biofiltration/bioretention system, or a combination of these as required by the City's LID Manual. As discussed in the Water Resources Report, the existing Project Site does not have any structural or LID BMPs to treat or infiltrate stormwater. Therefore, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions and would serve to prevent on-site flooding and nuisance water on the Project Site. Therefore, the Project would not require the construction of new stormwater drainage facilities or expansion of existing facilities. Impacts would be less than significant.

(3) Telecommunications Facilities

The Project Site is located in an area served by existing telecommunications infrastructure. Installation of new telecommunications infrastructure would primarily take place on-site, with minor off-site work associated with connections to the existing system. 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 Traffic Management Plan pursuant to Project Design Feature TR-PDF-2, 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. 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. As such, the Project would not require or

result in the relocation or construction of new or expanded telecommunications facilities. Impacts would be less than significant.

(4) Solid Waste

The construction activities necessary to build the Project would generate debris, some of which may be recycled.. Pursuant to the requirements of Senate Bill (SB) 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 unclassified 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 286 tons of construction and demolition waste. Given the remaining permitted capacity the Azusa Land Reclamation facility, which is approximately 58.84 million tons, as well as the remaining 148.40 million tons of capacity at the Class III landfills serving the County, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.[24]

As shown in Table VI-1 on page VI-40, upon full buildout, the Project would generate approximately 415 tons of solid waste per year when accounting for the removal of the existing land uses. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as AB 939 which requires California cities, counties, and approved regional solid waste management agencies responsible for enacting plans and implementing programs to diver 50 percent of their solid waste away from landfills and compliance with AB 341, which requires California commercial enterprises and public entities that generate four or more cubic yards per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's Zero Waste LA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.[25] The estimated annual net increase in solid requires California commercial enterprises and public entities that generate 4 cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Solid waste that

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[24] *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.*

[25] *The Zero Waste LA Franchise System would divide the City into 11 zones and designate a single trash hauler for each zone. Source: LA Sanitation, Final Program Environmental Impact Report for City Ordinance: City-Wide Exclusive Franchise System for Municipal Solid Waste Collection and Handling (SCH# 2013021052), March 2014.*

Table VI-1
Estimated Project Solid Waste Generation

Building	Size	Employee Generation Rate per ksf[a]	Estimated No. of Employees	Solid Waste Generation Rate[b]	Total Generation (tons/year)
Existing					
Studio and Production Space[c]	8,442 sf	4.0	34 emp	0.37 tn/emp/yr	13
Restaurant	2,551 sf	4.0	10 emp	2.98 tn/emp/yr	30
Total					*43*
Total to Be Removed					**43**
Proposed					
Office	136,200 sf	4.0	545 emp	0.37 tn/emp/yr	202
Restaurant	12,200 sf	4.0	82 emp	2.98 tn/emp/yr	244
Retail	2,200 sf	2.0	4 emp	2.98 tn/emp/yr	12
Total Proposed					**458**
Total Net Increase					**415**

ksf = thousand square feet

sf = square feet

tn/emp/yr = tons per employee per year

[a] *Employee Generation Rates from LADOT and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.*

[b] *Non-residential yearly solid waste generation factors from LASAN City Waste Characterization and Quantification Study, Table 4, July 2002. Assumes rate of 0.37 tons per employee per year (Services – Business) for office uses.*

[c] *The LADOT VMT Calculator Documentation does not include employee generation rates for studio uses. The General Office rate was used.*

Source: Eyestone Environmental, 2022.

would be generated by the Project represents approximately 0.0003 percent of the remaining capacity for the Class III landfills serving the County.[26] 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.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified

[26] *415 tons per year/148.40 million tons) x 100 = 0.0003 percent*

size.[27] The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant.

p. Wildfire

As discussed above, in Section 6.f, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone[28] or fire buffer zone.[29] In addition, the Project Site is not located near State responsibility lands. Therefore, no impacts related to the following would occur: (1) the impairment of an adopted emergency response plan or emergency evaluation plan related to wildfire; (2) the exposure of Project occupants to pollutant concentrations from a wildfire; (3) the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or (4) the exposure of people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes.

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[27] *Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.*

[28] *City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5533012025, 5533012013, 5533012012, and 5533012011, http://zimas.lacity.org/, accessed April 13, 2021. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.*

[29] *City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.*