VI. Other CEQA Considerations

VI. Other CEQA Considerations

1. Significant Unavoidable Impacts

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

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

As evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, and summarized below, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with regard to regional construction-related emissions of nitrogen oxides (NO_X); on- and off-site noise during construction; and on- and off-site vibration during construction (based on the significance threshold for human annoyance). Cumulative impacts associated with regional construction-related NO_X emissions, on- and off-site noise during construction, and off-site vibration during construction (based on the significance threshold for human annoyance) would also be significant and unavoidable. In addition, both Project-level and cumulative impacts associated with emissions of NOx and volatile organic compounds (VOC) would be significant and unavoidable under a long-term buildout scenario due to concurrent construction and operations.[1]

a. Air Quality (Regional Construction Emissions)

As discussed in Section IV.A, Air Quality, of this Draft EIR, Project buildout may occur in one phase, with a total construction period of approximately 32 months. Construction could begin as soon as 2023 and end as soon as 2026. However, the Project Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043. The analysis provided in Section IV.A,

[1] *While Project buildout is anticipated in 2026, the Project Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043.*

Air Quality, of this Draft EIR, assumes a 2026 buildout year to provide a conservative evaluation.

As discussed in detail in Section IV.A, Air Quality, of this Draft EIR, construction-related daily maximum regional construction emissions would exceed the SCAQMD daily significance threshold for NO_X. The regional construction impact would primarily occur over a nine-month duration beginning in the fourth quarter of 2023 during concurrent demolition and grading/excavation operations. Therefore, the regional construction emissions associated with the Project would result in a short-term significant impact related to NO_X. Implementation of Mitigation Measures AIR-MM-1 through AIR-MM-4 would reduce construction emissions. However, peak daily regional NO_X emissions would be reduced but would still exceed the SCAQMD regional threshold of 100 pounds per day. Therefore, Project construction would result in a significant Project-level and cumulative impact related to regional NO_X emissions, even with the incorporation of feasible mitigation measures. Although temporary, this impact would be significant and unavoidable.

As also discussed in Section IV.A, Air Quality, extending the buildout year to approximately 2043 has the potential to result in concurrent construction and operational activities. Analysis of these concurrent activities was considered in five-year increments, and construction activities were conservatively assumed to occur at approximately 50 percent of the maximum daily intensity as would occur during the shorter construction duration (2023–2026).[2] As shown in Table IV.A-13 in Section IV.A, Air Quality, of this Draft EIR, regional NOx and VOC emissions would exceed the SCAQMD regional operational significance threshold (55 pounds per day) and result in a temporary significant and unavoidable air quality impact.

b. On-Site Construction Noise

As discussed in detail in Section IV.I, Noise, of this Draft EIR, to present a conservative impact analysis, the estimated noise levels were calculated for a scenario in which all pieces of construction equipment were assumed to operate simultaneously and be located at the construction area nearest to the affected receptors. These assumptions represent a conservative noise scenario because construction activities would typically be spread out throughout the Project Site, and, thus, some equipment would be farther away from the affected receptors. In addition, the noise modeling assumes that the construction

[2] *For example, Project buildout by 2026 would require two separate excavation operations. With a long-term buildout and operation of some facilities on-site while construction is occurring, only a single excavation operation could be accommodated on-site, thus reducing the excavation activities and associated haul truck trips by half. Other construction activities such as building construction and finishing would likely occur at a further reduced level.*

noise would be constant, when, in fact, construction activities and associated noise levels are periodic and fluctuate based on the construction activities.

Since construction activities would occur over a period longer than 10 days for all stages combined, the corresponding significance criterion used in the construction noise analysis is when the construction-related noise exceeds the ambient L_{eq} noise level of 5 A-weighted decibels (dBA) at a noise-sensitive use. As discussed in Section IV.I, Noise, of this Draft EIR, the estimated noise levels during all stages of Project construction combined would exceed the significance criterion at all of the representative off-site receptor locations, with the exception of receptor location R6. The estimated construction-related noise would exceed the significance threshold by a range of 3.8 dBA at the uses represented by receptor location R4 to up to 22.7 dBA at the uses represented by receptor location R1, without the implementation of mitigation. The 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 represented by locations R2, R3, R4, R5, R7 and R8 to a less-than-significant level. However, the temporary sound barrier specified for receptor location R1 would not be effective in reducing the construction-related noise levels at the upper levels of the residential building (up to five stories) due to the higher ground elevation relative to the Project Site. In order to be effective, the temporary noise barrier would need to be as high as the building (i.e., five stories), which would not be feasible. Consequently, even with the implementation of Mitigation Measure NOI-MM-1, the construction-related noise at receptor R1 would still exceed the significance threshold by 6.7 dBA. There are no other feasible mitigation measures to further reduce the construction noise impact at receptor R1 to below the significance threshold. Therefore, Project-related construction noise impacts associated with on-site noise sources would remain significant and unavoidable. In addition, as discussed in detail in Section IV.I, Noise, of this Draft EIR, there would be potential cumulative noise impacts at the nearby sensitive uses (e.g., residential uses) located in proximity to the Project Site and Related Project Nos. 1, 11 and 15, in the event of concurrent construction activities. As such, cumulative noise impacts from on-site construction would be potentially significant.

c. Off-Site Construction Noise

As discussed in Section IV.I, Noise, of this Draft EIR, construction haul trucks would travel between the Project Site and the Santa Monica freeway (I-10) via Washington Boulevard, Fairfax Avenue, La Brea Avenue, San Vicente Boulevard, and/or Beverly Boulevard. Hauling activities are anticipated to occur between the hours of 7:00 A.M. and 4:00 A.M. with approval from the Bureau of Engineering District Engineer as well as between 8:00 A.M. and 4:00 A.M. on Saturdays. In addition, haul trucks would also utilize Venice Boulevard, Normandie Avenue, and Vermont Avenue to access the staging areas from I-10. The highest hourly construction truck trips would be associated with the

grading/excavation phase, during which up to approximately 107 truck trips could occur. As discussed in Section IV.I, Noise, of this Draft EIR, the hourly noise levels generated by Project construction trucks along Fairfax Avenue would be consistent with the existing daytime ambient noise levels for all construction stages, except for the grading/excavation stage, where the estimated construction truck noise would exceed the 5-dBA significance threshold by 0.5 dBA L_{eq}. The estimated noise levels along La Brea Avenue, San Vicente Boulevard, Beverly Boulevard, Normandie Avenue, Venice Boulevard, and Vermont Avenue (utilized by haul trucks from the two staging areas during the grading/excavation stage) would be below the significance criterion of a 5 dBA increase over the ambient noise level. In addition, the concrete mat foundation pour could occur during the nighttime hours, if permitted by the Executive Director of the Board of Police Commissioners. The estimated noise levels due to concrete trucks along Fairfax Avenue, La Brea Avenue, and San Vicente Boulevard, would exceed the measured nighttime ambient noise levels plus the 5-dBA significance threshold by up to 1.7 dBA. The estimated noise levels due to concrete trucks used for mat foundation pour traveling along Beverly Boulevard (66.4 dBA L_{eq}) would increase the nighttime ambient noise level (65.8 dBA L_{eq}) by 3.3 dBA, which would be below the 5-dBA significance threshold. Conventional mitigation measures, such as providing temporary noise barrier walls to reduce the off-site construction truck traffic noise impacts would not be feasible as the barriers would obstruct the access and visibility to the properties along the anticipated haul route(s). As such, there are no other feasible mitigation measures to reduce the temporary significant noise impacts associated with the Project's off-site construction trucks. Therefore, noise impacts from Project-related off-site construction truck trips would be significant and unavoidable. In addition, there are related projects located in the vicinity of Fairfax Avenue, La Brea Avenue, and San Vicente Boulevard between the Project Site and I-10, including Related Project Nos. 1, 3, 11, 12, 13, 15, 17, 19, and 21, which could utilize Fairfax Avenue, La Brea Avenue, and San Vicente Boulevard as a haul route. There are also related projects located in the vicinity of Beverly Boulevard, which could utilize Beverly Boulevard as a haul route, including Related Project Nos. 1, 5, 7, 8, 11, 15 and 16. Therefore, cumulative noise due to construction truck trips from the Project Site and other related projects has the potential to increase the ambient noise levels along the haul truck routes by 5 dBA. As such, cumulative noise impacts from off-site construction would also be potentially significant.

d. On-Site Construction Vibration (Human Annoyance)

As discussed in Section IV.I, Noise, of this Draft EIR, per Federal Transit Administrator (FTA) guidance, the significance criteria for human annoyance are 72 VdB for residential and hotel uses (receptor locations R1, R3, and R5 to R8) and 75 VdB for school uses (receptor location R4) uses, assuming there is a minimum of 70 vibration events occurring during a typical construction day. The FTA human annoyance criteria do not apply to people in an outdoor environment (receptor location R2). As discussed in detail in Section IV.I, Noise, of this Draft EIR, the estimated ground-borne vibration levels

from construction equipment would be below the significance criteria for human annoyance at all off-site sensitive receptor locations, with the exception of receptor location R1. The estimated ground-borne vibration levels at receptor location R1 would be up to 89.2 VdB, which would exceed the 72-VdB significance criterion during the demolition and grading/excavation stages with large construction equipment (i.e., large bulldozer, caisson drilling, and loaded trucks) operating within 80 feet of receptor location R1. The estimated ground-borne vibration levels at receptor location R1 would be 71.8 VdB with heavy construction equipment operating at a distance of 80 feet or greater, which would be below the 72 VdB significance criterion. As such, the ground-borne vibration impacts would be limited to construction along the eastern property line, within 80 feet of receptor R1.

Mitigation measures considered to reduce vibration impacts from construction activities with respect to human annoyance included the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, a wave barrier must be very deep and long to be effective, is cost prohibitive for temporary applications, such as construction, and is considered infeasible. In addition, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate ground-borne vibration from the excavation equipment. As such, there are no feasible mitigation measures to reduce the potential vibration human annoyance impacts. Therefore, vibration impacts from on-site construction with respect to human annoyance would be significant and unavoidable.

e. Off-Site Construction Vibration (Human Annoyance)

As discussed above, per FTA guidance, the significance criteria for human annoyance are 72 VdB for residential and hotel uses and 75 VdB for school uses. The estimated vibration levels generated by construction trucks traveling along the anticipated haul route(s) were assumed to be within 24 feet of the sensitive uses (i.e., the residential and motel uses) along Fairfax Avenue, La Brea Avenue, Beverly Boulevard, San Vicente Boulevard, Normandie Avenue, and Vermont Avenue. As indicated in Section IV.I, Noise, of this Draft EIR, the temporary vibration levels could reach approximately 72.6 VdB periodically as trucks pass sensitive receptors along the anticipated haul route(s) at a distance of 24 feet. The vibration-sensitive uses along Venice Boulevard are located a minimum of 55 feet from the truck traveled lane and would be exposed to vibration levels up to 61.8 VdB from the construction trucks, which would be below the 72-VdB significance criterion. However, the residential and motel uses along Fairfax Avenue, La Brea Avenue, San Vicente Boulevard, Beverly Boulevard, Normandie Avenue, and Vermont Avenue would be exposed to ground-borne vibration levels of up to 72.6 VdB, which would exceed the 72-VdB significance criterion. In addition, cumulative vibration impacts (per the human annoyance threshold) from construction trucks associated with related projects would be significant and unavoidable, since several of the related projects are anticipated to use

Fairfax Avenue, La Brea Avenue, Beverly Boulevard, and San Vicente Boulevard, as part of their haul route, or the staging areas along Normandie Avenue and Vermont Avenue, which would generate similar vibration levels.

As previously discussed, mitigation measures considered to reduce vibration impacts from construction activities with respect to human annoyance included the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, a wave barrier must be very deep and long to be effective, is cost prohibitive for temporary applications, such as construction, and is considered infeasible. In addition, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate ground-borne vibration from the excavation equipment. Furthermore, it would not be feasible to install a wave barrier along the public roadways for the off-site construction vibration impacts. As such, there are no feasible mitigation measures to reduce the potential vibration human annoyance impacts. Therefore, Project-level and cumulative vibration impacts from off-site construction with respect to human annoyance would be significant and unavoidable.

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

In addition to identification of a project's significant unavoidable impacts, CEQA Guidelines Section 15126.2(c) requires that an EIR describe the reasons why a project is being proposed, notwithstanding the effects of the identified significant and unavoidable impacts. The reasons why the Project has been proposed are grounded in the underlying purpose of the Project and the associated list of project objectives included in Section II, Project Description, of this Draft EIR.

As provided in Section II, Project Description, of this Draft EIR, the purpose of the Project is to maintain Television City as a studio use and to modernize and enhance production facilities within the Project Site to meet both the existing unmet and anticipated future demands of the entertainment industry, keep production activities and jobs in Los Angeles, upgrade utility and technology infrastructure, and create a cohesive studio lot. This purpose and associated objectives would support the objectives and policies of the Wilshire Community Plan, the City's General Plan Framework Element (Framework Element), and the Southern California Association of Governments' (SCAG) 2020–2045 Regional Transportation Plan/Sustainability Communities Strategy (2020–2045 RTP/SCS).

As discussed in Section IV.H, Land Use and Planning, of this Draft EIR, with regard to the Wilshire Community Plan, the Project would support Goal 2 to encourage strong and competitive commercial sectors that promote economic vitality and serve the needs of the

Wilshire community through well-designed, safe and accessible areas, while preserving historic and cultural character. The Project would involve the modernization and expansion of Television City to meet the contemporary needs and changing demands of the entertainment industry, while rehabilitating and preserving the integrity of the Primary Studio Complex on-site (Historic-Cultural Monument [HCM] No. 1167; CHC-2018-476-HCM). All new construction within the Project Site would be required to comply with the provisions of the Specific Plan, including historic preservation regulations, as applicable, as well as the Project Parameters set forth in Project Design Feature CUL-PDF-1. The Project would preserve all of the existing historic character-defining features of the Primary Studio Complex and restore those character-defining features which, in some cases, have been compromised in the past (prior to this Project), consistent with the HCM designation. The Project would also support Objective 5-1 to preserve existing open space resources and, where possible, develop new open space. Furthermore, the Project would support Objective 8-1 to provide adequate police facilities, personnel and protection to correspond with existing and future population and service demands. Through Project Design Features POL-PDF-1 through POL-PDF-6, the Project would include numerous operational design features to enhance safety within and immediately surrounding the Project Site and therefore reduce the demand for police services. Additionally, the Project would support Objective 10-2 to increase the use of public transit and Policy 12-1.1 to encourage non-residential developments to provide employee incentives for using non-vehicle transportation alternatives (including carpools, vanpools, buses, shuttles, subways, bicycles, and walking) by providing a Mobility Hub and TDM Program.

With regard to the Framework Element, the Project would support Objective 3.2 of the Land Use Chapter to provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled (VMT), and air pollution, as well as Policy 3.2.3 to provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations. In particular, the Project would include a Mobility Hub, which would facilitate the use of public transit and support opportunities for walking and biking, thus promoting an improved quality of life. Specifically, the Mobility Hub would include space to accommodate support uses, storage, maintenance, staging facilities, bike share, and ridership amenities. Such amenities would include interactive kiosks, which would provide real-time transit data and manage access to shared vehicles; charging docks; and self-repair bike stations.

Furthermore, the Project would support Objective 7.2 of the Economic Development Chapter to establish a balance of land uses that provide for commercial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality through the development of a mix of integrated and supporting land uses within a single site. Specifically, as previously discussed, the Project represents the continuation of an existing studio use and would involve the modernization and expansion of Television City to meet the contemporary needs and changing demands

of the entertainment industry, while rehabilitating and preserving the integrity of the HCM on-site. In addition, by providing a Mobility Hub on-site, the Project would facilitate a reduction in vehicle trips and VMT. This, along with the incorporation of Project design features provided in Section IV.A, Air Quality, and Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, would facilitate a reduction in emissions to improve environmental quality. In particular, with the incorporation of Project Design Features GHG-PDF-1 and GHG-PDF-2, the Project would meet the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Gold or equivalent green building standards and provide photovoltaic panels on the Project Site capable of generating a minimum of 2,000,000 kilowatt-hours annually.

The Project would also support the Mobility Plan 2035, which is the Transportation Chapter of the Framework Element, by providing short-term and long-term bicycle parking spaces in accordance with Los Angles Municipal Code (LAMC) requirements, including secured bicycle parking facilities, as well as valet service, showers, lockers, and bicycle service areas with repair stands within the Project Site. Furthermore, the Project Applicant would make a financial contribution toward bicycle improvements in support of the Mobility Plan 2035's policies, as well as pedestrian facilities improvements as part of the City's Vision Zero plan, as discussed further in Section IV.K, Transportation, of this Draft EIR. Lastly, the Project would contribute to and implement traffic-calming measures as part of a Neighborhood Traffic Management Plan to address potential cut-through traffic on surrounding residential streets, as also discussed in Section IV.K, Transportation, of this Draft EIR.

With regard to the 2020–2045 RTP/SCS, the Project would support the goals therein to improve mobility and accessibility; support healthy and equitable communities; increase travel choices within the transportation system; reduce greenhouse gas emissions; and improve air quality. The Project would be developed 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 several bus lines. The availability and accessibility of public transit in the vicinity of the Project Site is documented by the Project Site's location within a designated SCAG High-Quality Transit Area (HQTA) and City of Los Angeles Transit Priority Area, as defined in the City's Zoning Information (ZI) File No. 2452. As previously discussed, the Project would also include a TDM Program and would provide bicycle parking spaces. Furthermore, the Project Applicant would make a financial contribution toward bicycle improvements under the Mobility Plan 2035, as well as pedestrian facilities improvements. Additionally, the Project would contribute to and implement traffic-calming measures as part of a Neighborhood Traffic Management Plan. The Project would also include adequate parking to serve the proposed uses, including the provision of electric vehicle charging stations consistent with LAMC requirements. As such, the Project would provide opportunities for walking and biking and promote an

improved quality of life, and the Mobility Hub and TDM Program would encourage the use of public transit.

Furthermore, as detailed in Section V, Alternatives, of this Draft EIR, other than Alternative 1 (No Project Alternative), none of the alternatives would eliminate all of the Project's significant and unavoidable impacts. In addition, the No Project Alternative would not achieve the Project's purpose or the associated Project objectives. As discussed in detail in Section V, Alternatives, of this Draft EIR, the environmentally superior alternative, Alternative 5 (Above-Ground Parking Alternative), would eliminate the Project's significant regional construction-related air quality impact but would not eliminate the Project's significant construction-related noise and vibration impacts. In addition, Alternative 5 would not meet a number of the Project's basic objectives to the same extent as the Project. Alternative 5 would also result in substantially increased building massing on-site due to several multi-level parking podiums needed to accommodate required parking.

Based on the above, the Project reflects a development program that is consistent with the overall vision of the Wilshire Community Plan, as well as with other primary land use plans such as the City's Framework Element and SCAG's 2020–2045 RTP/SCS. Additionally, the Project's significant and unavoidable impacts with regard to construction-related regional emissions, noise, and vibration would only occur during temporary and periodic construction activities, similar to those occurring at other development sites in urban areas, particularly within infill locations. As such, the benefits of the Project, as outlined above, would outweigh the effects of its temporary significant and unavoidable impacts. 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(d) provides that an EIR must evaluate significant irreversible environmental changes that would be caused by implementation of a proposed project. As stated in CEQA Guidelines Section 15126.2(d), "[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 include the 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 to this Draft EIR. As discussed therein, pursuant to the requirements of SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Furthermore, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project's general contractor and/or subcontractors would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. In addition, during operation, 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 a specified size. The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling, recycling of organic waste, and participation in the City's Curbside Recycling Program. Overall, 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 and the Project would not result in significant impacts regarding solid waste.

b. Water

Consumption of water during construction and operation of the Project is addressed in Section IV.M.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, and such water demand during construction would be offset by the removal of the existing uses on the Project Site. 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 Water Supply Assessment prepared by LADWP for the Project and included as Appendix N of this Draft EIR. The Project would also be required to reduce indoor water use by at least 20 percent, in accordance with the City of Los Angeles Green Building Code. In addition, the Project would implement Project Design Feature WAT-PDF-1, which includes water conservation measures in excess of code requirements, such as high efficiency toilets, high efficiency shower heads, ENERGY STAR Certified residential dishwashers, drip/subsurface irrigation, and proper hydro-zoned irrigation. Thus, as evaluated in Section IV.M.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 significant impacts 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. 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, construction of 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). In addition, as discussed in Section IV.C, Energy, of this Draft EIR,

the Project would comply with all applicable energy conservation policies and plans, including the California Title 24 energy standards, the 2019 CALGreen Code, the City of Los Angeles Green Building Code, City of Los Angeles Green New Deal and the 2020–2045 RTP/SCS. Applicable requirements of Title 24, the CALGreen Code, and the Green Building Code that would be implemented by the Project include specific lighting requirements to conserve energy, window glazing to reflect heat, enhanced insulation to reduce heating and ventilation energy usage, and enhanced air filtration. In addition, compliance with Title 24 standards would ensure the use of the most energy efficient and energy conserving technologies and construction practices. The Project would also implement measures to comply with Title 24 energy efficiency requirements, including Project Design Features GHG-PDF-1 and WAT-PDF-1 included in Section IV.E, Greenhouse Gas Emissions, and Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, respectively.

Regarding transportation uses, the Project design would reduce VMT in comparison to developments located in non-infill, non-urban areas and encourage the use of alternative modes of transportation. The Project would also be consistent with regional planning strategies that address energy conservation. As discussed above and in Section IV.H, Land Use and Planning, of this Draft EIR, SCAG's 2020–2045 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. The 2020–2045 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing the use of renewable sources. The Project would be consistent with the energy efficiency policies emphasized in the 2020–2045 RTP/SCS. Most notably, the Project is a commercial development located in an HQTA, as designated by the 2020–2045 RTP/SCS. The 2020–2045 RTP/SCS identifies HQTAs as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Local jurisdictions are encouraged to focus housing and employment growth within HQTAs to reduce VMT. The Project would provide new development in proximity to neighborhood services and would be well-served by existing public transportation, as evidenced by the Project Site's location within a designated HQTA. The Project's generation of new job opportunities within an HQTA is also consistent with numerous policies in the 2020–2045 RTP/SCS related to locating new jobs near transit.

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 Section IV.F, Hazards and Hazardous Materials, of this Draft EIR. As evaluated therein, operation of the Project would be expected to involve the use and storage of potentially hazardous materials typical of those used in studio campuses, including paints, stains, adhesives, solvents and other materials used in set design and fabrication, fuels, pesticides for landscaping, cleaning and maintenance supplies, materials for pyrotechnic activities, and other general products related to studio operations. 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. Additionally, the existing plans and protocols currently implemented at the Project Site with regard to the handling of hazardous materials and wastes would be updated pursuant to Project Design Features HAZ-PDF-1 through HAZ-PDF-4. Furthermore, the Project Site is currently designated as a small quantity generator under Resource Conservation and Recovery Act (RCRA), and the Applicant implements the life cycle provisions of both RCRA and the Hazardous Waste Control Law (HWCL) by maintaining the required inspection logs, manifests, and records, which are subject to review by the Los Angeles County Department of Health Services. In addition, the Applicant currently employs staff members trained in the appropriate standards for the management of hazardous waste and the clean-up of releases and uses licensed firms for the transport of hazardous waste. The Project would allow for the continued operation of the Project Site under these provisions and the required records, training, and licensed transport would continue to be maintained, thus minimizing risks.

Additionally, any asbestos or lead based paint encountered during demolition and construction would be handled and disposed of according to Project Design Features HAZ-PDF-5 and HAZ-PDF-6 and any contaminated soil would be handled and disposed of according to the Soil Management Plan prepared for the Project, as detailed in Mitigation Measure HAZ-MM-1. With regard to methane, Mitigation Measure HAZ-MM-2 requires the installation of controls during Project construction to mitigate the effects of subsurface gases on workers and the public. These measures would include monitoring devices for methane and benzene to alert workers of elevated gas concentrations, contingency procedures if elevated gas concentrations are detected, worker training to identify exposure symptoms and implement alarm response actions, and the minimization of soil and groundwater during excavations. Additionally, soil removed as part of construction would be sampled and tested for off-site disposal in a timely manner and if soil is stockpiled prior to disposal, it would be managed in accordance with the Project's Storm Water Pollution Prevention Plan (SWPPP). Furthermore, fencing would be erected to limit public access and allow for gas dilution. Lastly, a Health and Safety Plan (HASP) would be prepared to describe the proposed construction activities and hazards associated with each activity. As

such, implementation of Mitigation Measure HAZ-MM-2 would ensure potential impacts related to subsurface gases and associated potential impacts to soil and groundwater would be less than significant.

Therefore, any associated risk due to the use or disposal of hazardous materials would be reduced to a less-than-significant level through implementation of Project Design Features HAZ-PDF-1 through HAZ-PDF-6 and Mitigation Measures HAZ-MM-1 and HAZ-MM-2. As such, it is not expected that the Project would cause irreversible damage from environmental accidents.

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 for future generations or for other uses. However, the consumption of such resources would not be considered substantial and would be consistent with regional and local growth forecasts and development goals for the area. The loss of such resources would not be highly accelerated when compared to existing conditions, and such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result from the Project, such changes are concluded to be less than significant, and the limited use of nonrenewable resources that would be required by Project construction and operation is justified.

4. Growth-Inducing Impacts

CEQA Guidelines Section 15126.2(e) 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 burden 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 involve the modernization and expansion of Television City to meet the contemporary needs and changing demands of the entertainment industry, while rehabilitating and preserving the integrity of the HCM. 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 Wilshire 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. The Project would draw from the existing regional pool of construction workers who typically move from project to project as work is available. Project-related construction workers would not be anticipated to relocate their household's permanent place of residence as a consequence of working on the Project and, therefore, no new permanent residents are expected to be generated during construction of the Project. Accordingly, Project construction would not induce substantial population growth.

As discussed in the Initial Study included as Appendix A to this Draft EIR, the Project would generate an estimated total of 7,832 employees at buildout, for a net increase of 5,702 employees over existing conditions. Per the employment data from the 2020–2045 RTP/SCS, an estimated 1,947,472 employees are projected within the City of Los Angeles in 2026, the Project's earliest buildout year, with 49,586 new employees projected in the City between 2021 and 2026. The Project's net increase in employment would represent 0.29 percent of the total number of employees in the City in 2026 and 11.50 percent of the growth between 2021 and 2026. In the event of phased development of the Project, which could potentially extend to 2043, the Project's net increase in employment would represent 0.27 percent of the total number of employees in the City in 2043 and 2.61 percent of the total projected growth between 2021 and 2043. Overall, the provision of new jobs would constitute a small percentage of the City's anticipated employment growth and would not be considered "unplanned growth."

Furthermore, while some new Project employees may be anticipated to relocate to the Project vicinity, many would not, nor would existing employees be expected to move as a result of redevelopment of the Project Site. Accordingly, this potential indirect increase in

population would not be substantial. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project Site, and it is anticipated that other employees would commute to the Project Site from other communities both in and outside of the City, as under existing conditions. Therefore, given that the Project would not directly contribute to substantial population growth in the Project area through the development of residential uses, and since many of the employment opportunities generated by the Project would be filled by people already residing in the Project vicinity or who would commute to the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Further, as the Project would be located in an urbanized area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth. A variety of public transit options are located within 0.5 mile from the Project Site. Specifically, a number of bus lines provide transit service throughout the Project area, with bus stops located adjacent to the Project Site on both Beverly Boulevard and Fairfax Avenue as well as within a one-block radius; these include Los Angeles County Metropolitan Transportation Authority (Metro) Bus Lines 14, 16, 17, 217, 218, 316, and 780, several of which have headways of 15 minutes or less during the morning and afternoon peak commute periods; and Los Angeles Department of Transportation (LADOT) DASH Line FX. Furthermore, Metro transit facilities planned in the area include the Metro D (Purple) Line extension. The first section of the Metro D (Purple) Line extension, which includes a new Wilshire/Fairfax Station, is currently under construction. The new Wilshire/Fairfax Station will be located approximately 0.8 mile south of the Project Site, with a station portal on the southeast corner of Wilshire Boulevard and Orange Grove Avenue. In addition, as part of the TDM Program set forth in Project Design Feature TR-PDF-2 and as depicted in Figure II-9 in Section II, Project Description, of this Draft EIR, a Mobility Hub would be located on-site to support first-mile/last-mile connections; encourage employee and visitor use of public transit, carpooling, vanpooling, and biking/scootering to work; and to support other TDM strategies, as previously discussed.

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. As discussed in Sections IV.M.1, Utilities–Water Supply and Infrastructure, IV.M.2, Utilities–Wastewater, and IV.M.3, Utilities–Electric Power, Natural Gas, and Telecommunications Infrastructure, of this Draft EIR, while the Project would require local infrastructure to connect the Project Site to the mainlines, 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.

d. Conclusion

Overall, the Project would be consistent with the growth forecast for SCAG's 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 or 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 and to improve safety and walkability. 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 were evaluated. 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. Air Quality

Mitigation Measures AIR-MM-1 to AIR-MM-4 are included in Section IV.A, Air Quality, of this Draft EIR, to reduce the Project's air quality emissions during construction. Mitigation Measure AIR-MM-1 requires that prior to demolition, a Project representative would make available to the City of Los Angeles Department of Building and Safety and the South Coast Air Quality Management District a comprehensive inventory of all off road construction equipment, equal to or greater than 50 horsepower, that, with the exception of demolition activities, will be used during any portion of construction. A copy of each unit's certified tier specification, Best Available Control Technology documentation, and CARB or SCAQMD operating permit would be available on-site at the time of mobilization of each applicable unit of equipment to allow a Construction Monitor to compare the on-site equipment with the inventory and certified Tier specification and operating permit. Furthermore, Mitigation Measure AIR-MM-2 requires that the Project's truck operator(s)/ construction contractor(s) commit to using 2010 model year or newer engines that meet CARB's 2010 engine emission standards of 0.01 grams per brake horsepower-hour (g/bhp-hr) for particulate matter and 0.20 g/bhp-hr of nitrogen oxide emissions or newer, cleaner trucks for haul trucks associated with demolition and grading/excavation activities

and concrete delivery trucks during concrete mat foundation pour. Additionally, Mitigation Measure AIR-MM-3 requires that construction staging areas be located as far away as feasible from adjacent residential uses, and Mitigation Measure AIR-MM-4 requires that all construction equipment would be maintained and properly tuned in accordance with manufacturer's specifications and all equipment would be checked by a certified mechanic and determined to be running in proper condition prior to operation.

Implementation of Mitigation Measures AIR-MM-1 through AIR-MM-4 would be beneficial in addressing the Project's air quality impacts during construction and would not result in any physical improvements that would have the potential to result in significant impacts. With implementation of Mitigation Measures AIR-MM-1, AIR-MM-2, and AIR-MM-4, daily regional NO_x emissions would be reduced from an estimated 296 pounds per day to approximately 205 pounds per day, and Mitigation Measure AIR-MM-3 would minimize the exposure of air pollutants to adjacent residential uses. As such, implementation of Mitigation Measures AIR-MM-1 through AIR-MM-4 would not result in adverse secondary impacts.

b. Cultural Resources

Mitigation Measure CUL-MM-1 is included in Section IV.B, Cultural Resources, of this Draft EIR to address potential Project impacts on archaeological resources. Specifically, Mitigation Measure CUL-MM-1 requires that a principal archaeologist be retained to prepare a written Cultural Resource Monitoring and Treatment Plan in accordance with the Secretary of the Interior's Standards for Archaeological Documentation, to reduce potential Project impacts on unanticipated archaeological resources unearthed during construction, with an emphasis on potential historical-period materials. The Cultural Resource Monitoring and Treatment Plan would include monitoring protocols relative to the varying archaeological sensitivity across the Project Site, provisions for evaluating and treating unanticipated cultural materials discovered during ground-disturbing activities, and implementation of a Worker Environmental Awareness Program (WEAP) training program for construction workers involved in ground disturbance activities. This mitigation measure could potentially require targeted excavations to unearth additional archaeological resources, if such is the recommendation of the principal archaeologist. In addition, in the event that grading and excavation activities are temporarily diverted, construction activities could be delayed and the duration of construction could be extended. As discussed above, if the duration of construction is extended, the same construction activities evaluated throughout this Draft EIR would continue to occur. Extending the duration of construction would not result in new or increased activities not already evaluated in this Draft EIR. As such, extending the construction duration would not result in new or increased impacts related to cultural resources. Therefore, implementation of CUL-MM-1 would be beneficial in reducing

Project impacts on archaeological resources, if any, and would not result in significant adverse secondary impacts.

c. Geology and Soils

Mitigation Measure GEO-MM-1 is included in Section IV.D, Geology and Soils, of this Draft EIR to address potential Project impacts on paleontological resources. This mitigation measure requires that a qualified paleontologist be retained prior to ground disturbance activities associated with the Project in order to develop a site-specific Paleontological Resource Mitigation and Treatment Plan that would include monitoring of all ground disturbance activities within Pleistocene age older alluvial deposits and the Palos Verdes Sand, and if potential resources are found, ground disturbance activities may be temporarily halted as directed by the paleontologist. This mitigation measure could potentially require excavations to unearth additional paleontological resources, if recommended by the paleontologist. In addition, in the event that grading and excavation activities are temporarily diverted due to the discovery of a paleontological resource, construction activities could be delayed and the duration of construction could be extended. As discussed above, if the duration of construction is extended, the same construction activities evaluated throughout this Draft EIR would continue to occur. Extending the duration of construction would not result in new or increased activities not already evaluated in this Draft EIR. As such, extending the construction duration would not result in new or increased impacts related to geology and soils, including paleontological resources. Therefore, implementation of GEO-MM-1 would be beneficial in reducing Project impacts on paleontological resources, if any, and would not result in significant adverse secondary impacts.

d. Hazards and Hazardous Materials

Section IV.F, Hazards and Hazardous Materials, of this Draft EIR incudes Mitigation Measures HAZ-MM-1 and HAZ-MM-2 to address potential hazards during construction. Mitigation Measure HAZ-MM-1 provides for the implementation of a Soil Management Plan that includes protocols regarding precautions, observations, and evaluations of soil conditions to be implemented during ground disturbance activities. The protocols include precautions during earthwork activities within specified areas of the Project Site, implementation of a Health and Safety Plan, measures for sampling and stockpiling of suspect soils, compliance with regulations regarding the safety of construction workers, and provisions for below-grade structures such as storm water infrastructure that have the potential to be encountered during construction. Mitigation Measure HAZ-MM-2 provides for monitoring devices for methane and benzene for construction workers as well as other measures to address potential risks associated with subsurface gases and impacted soil and groundwater, if encountered. Implementation of these mitigation measures would address impacts associated with the release of hazardous materials into the environment.

These measures would be implemented in accordance with applicable regulatory requirements and regulatory oversight. As such, these measures would not include physical improvements that would result in adverse secondary impacts.

e. Noise

Mitigation Measure NOI-MM-1 requires temporary and impermeable sound barriers to be installed during construction. In addition, at plan check, building plans would include documentation prepared by a noise consultant verifying compliance with this measure. The installation of the sound barriers would include limited construction activities associated with installation. Any noise associated with this installation would not result in additional noise beyond what has already been disclosed in the discussion of construction noise impacts. Furthermore, the sound barrier would reduce the Project's noise impacts from construction, and the temporary sound barriers would be removed upon completion of construction. 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 must 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; odors; biological resources; human remains; landslides; soil erosion; soils incapable of supporting septic tanks; airport or airstrip-related hazards; an emergency response plan or emergency evacuation plan; wildland fires; water quality control plans or sustainable groundwater management plans; physical division of an established community; mineral resources; airport or airstrip-related noise; population and housing; schools; parks; libraries; recreation; transportation hazards due to a geometric design feature; inadequate emergency access; solid waste; and wildfire. A summary of the analysis provided in Appendix A for these issue areas is provided below.

a. Aesthetics

As detailed in the Initial Study, Senate Bill (SB) 743 [Public Resources Code (PRC) Section 21099(d)] sets forth the following: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." Pursuant to

PRC Section 21099, the Project is an employment center project that would be located on an infill site within a TPA. The Project is considered an employment center project because it is located on property that is zoned to permit commercial uses with a maximum FAR greater than 0.75. In addition, the Project Site is located on an infill site, as that term is defined in PRC Section 21099(a)(4), because the Project Site includes lots located within an urban area that has been previously developed. Lastly, the Project Site is located within a TPA, as that term is defined in PRC Section 21099(a)(7), because it is located within one-half mile of an existing "major transit stop." Specifically, a number of bus lines provide transit service throughout the Project area, with bus stops located adjacent to the Project Site on both Beverly Boulevard and Fairfax Avenue as well as within a one-block radius; these include Los Angeles County Metropolitan Transportation Authority (Metro) Bus Lines 14, 16, 17, 217, 218, 316, and 780, several of which have headways of 15 minutes or less during the morning and afternoon peak commute periods; and Los Angeles Department of Transportation (LADOT) DASH Line FX. In addition, Metro transit facilities planned in the area include the Metro D (Purple) Line extension. The City's Zone Information and Map Access System (ZIMAS) also confirms the Project Site's location within a transit priority area, as defined in ZI No. 2452. Therefore, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts are not considered to be significant impacts on the environment and therefore do not require further evaluation under CEQA. However, an analysis of the Project's potential aesthetics impacts is included in the Initial Study for informational purposes only and not for determining whether the Project will result in significant impacts on the environment. The analysis therein concludes that in the absence of SB 743, aesthetic impacts of the Project would be less than significant.

b. Agriculture and Forestry Resources

The Project Site is located in an urbanized area of the City of Los Angeles and is developed with commercial buildings 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 vicinity of the Project Site. Therefore, as concluded in the Initial Study, no impacts to agriculture and forestry resources would occur.

c. Air Quality (Odors)

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. 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. Therefore, with compliance with existing regulatory requirements, the Project would not create odors that would adversely affect a substantial number of people.

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, as concluded in the Initial Study, Project impacts related to odors would be less than significant.

d. Biological Resources

The Project Site is located in an urbanized area and is currently developed with studio-related uses. Landscaping within the Project Site is limited to minimal ornamental landscaping and hardscape features. Specifically, the Project Site perimeter is enclosed with chain link, wrought iron, and/or combination block wall/chain link fencing, much of which is lined with trees, shrubs, bougainvillea and climbing vines, and segments of which include green screening. Additional landscaping within the Project Site interior includes limited trees, succulents and shrubs, and some of the parking areas include landscaped infiltration basins. Street trees are also located along Beverly Boulevard and Fairfax Avenue. 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 (CDFW) or U.S. Fish and Wildlife Service (USFWS). In addition, 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. Furthermore, 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. There are also no

water bodies that could serve as habitat for fish 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. A total of 181 trees and palms were inventoried on and surrounding the Project Site including 62 private property trees/palms, 88 off-site trees whose canopies overhang the Project Site, and 31 street trees. None of the trees within the Project Site are protected under the City of Los Angeles Native Tree Protection Ordinance. To allow for development of the Project Site, all 62 of the existing on-site trees and three street trees would be removed as part of the Project and replaced in compliance with applicable City requirements. All other trees would be avoided or preserved in place. Pursuant to the requirements of the City of Los Angeles Urban Forestry Division, the on-site trees are to be removed and replaced at a 1:1 ratio, and the street trees are to be removed and replaced at a 2:1 basis. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources, including a tree preservation policy or ordinance.

Although unlikely due to the Project Site's location within a highly urbanized area, the trees to be removed as part of the Project could potentially provide nesting sites for migratory birds. However, the Project would comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish and Game Code Section 3503 states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." No exceptions are provided in the California Fish and Game Code, and CDFW has never promulgated any regulations interpreting these provisions.

In accordance with the Migratory Bird Treaty Act and California Fish and Game Code, if vegetation removal activities must occur during the nesting season (February 1 through August 31), a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If any active nests are detected, the area would be flagged with a buffer (ranging between 50 and 300 feet, as determined by the monitoring biologist), and the area would be avoided until the nesting cycle has been completed or the monitoring biologist has determined that the nest has failed. With compliance with the Migratory Bird Treaty Act, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with

established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

For the foregoing reasons, as concluded in the Initial Study, Project impacts to biological resources would be less than significant.

e. Cultural Resources (Human Remains)

The Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. Nevertheless, as the Project would require excavation at depths greater than those that have previously occurred on-site, the potential exists to uncover existing but undiscovered human remains. If human remains are discovered during Project construction, work in the immediate vicinity of the construction area would be halted, and the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the discovery until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determines the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the most likely descendent. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. Therefore, as concluded in the Initial Study, due to the low potential that any human remains are located on the Project Site and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, Project impacts related to human remains would be less than significant.

f. Geology and Soils (Landslides; Soil Erosion; Soils Capable of Supporting Septic Tanks)

The Project Site and surrounding area are fully developed and the Project Site is generally characterized by relatively level topography. Given the developed/paved nature of the Project Site, large areas of exposed soil or rocks that could slide or become loose are not present. In addition, the Project Site is not located in a landslide area as mapped by the State, nor is the Project Site mapped as a landslide area by the City of Los Angeles. As such, as concluded in the Initial Study, no impacts from landslides would occur.

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. This potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities during Project construction. Specifically, all grading activities would require grading permits from the City of Los Angeles Department of Building and Safety (LADBS), which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of LAMC Chapter IX, Article 1, which addresses grading, excavations, and fills. Furthermore, the Project would be required to comply with the City's LID ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Therefore, as concluded in the Initial Study, impacts related to soil erosion would be less than significant.

As discussed in IV.M.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project Site is located within an area served by existing wastewater infrastructure and the Project's wastewater demand would be accommodated by connections to the existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, as concluded in the Initial Study, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems.

g. Hazards and Hazardous Materials (Airport or Airstrip-Related Hazards; Emergency Response Plan or Evacuation Plan; Wildland Fires)

With regard to airports, the Project Site is not located within 2 miles of an airport or within an airport planning area. The nearest airport is the Santa Monica Airport located approximately 8.4 miles southwest of the Project Site. Given the distance between the Project Site and this airport, the Project would not have the potential to exacerbate current environmental conditions that would result in a safety hazard or excessive noise. Therefore, as concluded in the Initial Study, no impact would occur.

With regard to emergency response and evacuation, according to the Safety Element, the nearest disaster routes within the Project area are Beverly Boulevard, adjacent to the Project Site's northern property line, and La Cienega Avenue, approximately one mile to the west. While it is expected that the majority of Project construction activities would be confined to the Project Site, limited off-site construction activities may occur within 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. Operation of the Project would generate traffic in the Project vicinity and would result in limited modifications to Project Site access, primarily in expanding the number of access points. Additionally, the Project would comply with Los Angeles Fire Department (LAFD) access requirements and would not impede emergency access within the Project vicinity. Therefore, the Project would not cause an impediment along the City's designated disaster routes or impair implementation of the City's emergency response plan. As concluded in the Initial Study, impacts related to the implementation of the City's emergency response plan would be less than significant, and no mitigation measures are required.

With regard to wildland fires, the Project Site is located in an urbanized area without any wildlands in the vicinity. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone. Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety, and the proposed studio uses would not create a fire hazard that has the potential to exacerbate wildfire risks. Therefore, as concluded in the Initial Study, the Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death as a result of exposure to wildland fires. No impact would occur.

h. Hydrology and Water Quality (Water Quality Control Plans or Sustainable Groundwater Management Plans)

Potential pollutants generated by the Project would be typical of studio and related commercial land uses and may include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. The implementation of BMPs required by the City's LID Ordinance would target these pollutants to minimize pollutant loads in stormwater runoff. Implementation of LID features as part of the Project could result in an improvement in surface water quality runoff as compared to existing conditions. As such, the Project would not introduce new pollutants or an increase in pollutants that would conflict with or obstruct any water quality control plans for the Ballona Creek Watershed. By complying with existing applicable regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. As concluded in the Initial Study, impacts would be less than significant.

i. Land Use and Planning (Physical Division of an Established Community)

The Project Site is currently developed with studio-related uses and is located in an urbanized area that is developed with a diverse mix of land uses. In general, the major arterials in the Project vicinity, including Beverly Boulevard, 3rd Street, and Fairfax Avenue, are lined with commercial, institutional, and some residential uses, with residential neighborhoods interspersed between the major arterials. Land uses immediately surrounding the Project Site include a six-story apartment complex, Broadcast Center Apartments, to the east which includes a ground floor grocery store and café. To the south are large-scale commercial uses, including The Grove, a regional outdoor shopping and entertainment center that includes groupings of one- to three-story retail shops, a movie theater, restaurants, and a seven-level (plus rooftop) parking garage; and The Original Farmers Market with one- and two-story restaurants and other food-related businesses including a four-story mixed-use office and retail building, as well as the Farmers Market Storage Facility, the historic Gilmore Adobe, and surface parking. Along Fairfax Avenue to the west are primarily low-rise community-serving commercial uses, including a gas station, bank, dry cleaner, several restaurants, and retail stores, interspersed with small surface parking lots. Similar development of up to three stories is located to the north along Beverly Boulevard. The organization of such developed uses is defined by the existing street grid, with residential uses concentrated along side streets.

Under the Specific Plan, portions of the Project Site would be redeveloped with new studio-related uses, including associated circulation improvements, parking facilities, landscaping, and open space. These uses would be consistent with the existing uses on-site as well as the other commercial developments located adjacent to and in the general vicinity of the Project Site. All proposed development would occur within the boundaries of the Project Site. Therefore, as concluded in the Initial Study, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant.

j. Mineral Resources

No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone or Surface Mining District where significant mineral deposits are known to be present or within a mineral producing area as classified by the California Geologic Survey. The majority of the Project Site is located within a City designated oil drilling area, but has been developed with the Television City studio since the 1950s. Therefore, as concluded in the Initial Study, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur.

k. Noise (Airport and Airstrip)

The Project Site is not located within the vicinity of a private airstrip. The closest private airstrip or airport is the Santa Monica Airport, which is located approximately 8.4 miles southwest of the Project Site. In addition, the Project Site is not located within 2 miles of an airport or within an area subject to an airport land use plan. Given the distance between the Project Site and the closest private airstrip and public airport, the Project would not have the potential to expose people that reside or work in the Project area to excessive noise levels from these sources of noise. As concluded in the Initial Study, no impacts would occur.

l. Population and Housing

The Project does not include housing and thus would not directly introduce a new residential population that would contribute to population growth in the vicinity of the Project Site or the Wilshire Community Plan area.

While construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time during which their specific skills are needed to complete a particular phase of the construction process. The Project would draw from the existing regional pool of construction workers who typically move from project to project as work is available. Project-related construction workers would not be anticipated to relocate their household's permanent place of residence as a consequence of working on the Project and, therefore, no new permanent residents are expected to be generated during construction of the Project. Accordingly, Project construction would not induce substantial population growth.

With regard to Project employment, as discussed in the Initial Study, the Project would generate an estimated total of 7,832 employees at buildout, for a net increase of 5,702 employees over existing conditions. Per the employment data from the 2020–2045 RTP/SCS, an estimated 1,947,472 employees are projected within the City of Los Angeles in 2026, the Project's earliest buildout year, with 49,586 new employees projected in the City between 2021 and 2026. The Project's net increase in employment would represent 0.29 percent of the total number of employees in the City in 2026 and 11.50 percent of the growth between 2021 and 2026. In the event of phased development of the Project which could potentially extend to 2043, the Project's net increase in employment would represent 0.27 percent of the total number of employees in the City in 2043 and 2.61 percent of the total projected growth between 2021 and 2043.

While some new Project employees may be anticipated to relocate to the Project vicinity, many would not, nor would existing employees be expected to move as a result of

redevelopment of the Project Site. Accordingly, this potential indirect increase in population would not be substantial. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project Site, and it is anticipated that other employees would commute to the Project Site from other communities both in and outside of the City, as under existing conditions. Therefore, given that the Project would not directly contribute to substantial population growth in the Project area through the development of residential uses and since many of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site or who would commute to the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Further, as the Project would be located in an urbanized area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth.

Based on the above, the Project would not induce substantial population growth either directly or indirectly. As concluded in the Initial Study, impacts would be less than significant. Furthermore, as no housing currently exists on the Project Site, the Project would not cause the displacement of any persons, housing, or require the construction of housing elsewhere. Therefore, as concluded in the Initial Study, no impacts related to displacement of people or housing would occur.

m. Public Services

(1) Schools

The Project Site is located within the boundaries of LAUSD, which is divided into six local districts. The Project Site is located in Local District (LD) West and is served by Hancock Park Elementary, John Burroughs Middle School, and Fairfax Senior High School. As previously discussed, the Project does not include residential uses. Therefore, Project implementation would not result in a direct increase in the number of students within the LAUSD service area due to the introduction of a residential population. In addition, while some new Project employees may be anticipated to relocate to the Project vicinity, many would not, nor would existing employees be expected to move as a result of redevelopment of the Project Site, and thus an associated demand for new or expanded school facilities would not be expected. Furthermore, per SB 50, the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered full mitigation of Project-related school impacts. Therefore, as concluded in the Initial Study, impacts related to service ratios or other performance objectives for schools would be less than significant.

(2) Parks

Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. Nearby public parks and recreational facilities include Pan Pacific Park, the Fairfax Senior Citizen Center, Poinsettia Recreation Center, William S. Hart Park, De Longpre Park, and Carthay Circle Park, as well as La Cienega Park located in and operated by the City of Beverly Hills. As previously discussed, the Project would not include residential uses and would not generate a new residential population that would regularly utilize nearby parks and recreational facilities. In addition, while some new Project employees may be anticipated to relocate to the Project vicinity, many would not, nor would existing employees be expected to move as a result of redevelopment of the Project Site, and thus an associated demand for new or expanded park facilities would not be expected. While it is possible that some of the 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. Moreover, Project employees would be more likely to use parks near their homes during non-work hours. Furthermore, the Project proposes on-site outdoor areas and may include fitness amenities for Project employees, thus reducing the likelihood that employees would use local parks. Therefore, as concluded in the Initial Study, impacts related to park services would be less than significant.

(3) Libraries

The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles through its Central Library, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through web-based resources. The nearest library is Fairfax Branch Library located less than 0.2 mile to the southeast within Pan Pacific Park. As previously discussed, the Project would not include residential uses and would not generate a new residential population that would utilize local libraries. In addition, while some new Project employees may be anticipated to relocate to the Project vicinity, many would not, nor would existing employees be expected to move as a result of redevelopment of the Project Site, and thus an associated demand for new or expanded library facilities would not be expected. While it is possible that some of the employees may utilize local libraries, such use would be anticipated to be limited due to the availability of on-site and web-based resources. Therefore, as concluded in the Initial Study, impacts related to libraries would be less than significant.

n. Recreation

As discussed above, the Project would not generate a new residential population that would regularly utilize nearby parks and recreational facilities, and any use of local

parks and recreational facilities is anticipated to be limited. The new employment opportunities generated by the Project may be filled, at least in part, by employees presently residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of new Project employees would be expected to create new demand for local parks and recreational facilities, and such use is anticipated to be limited due to work obligations and the travel time necessary to access off-site parks and recreational facilities. In addition, Project employees are often more likely to use parks and facilities near their homes during non-work hours. Furthermore, the Project proposes on-site outdoor areas and may include fitness amenities for Project employees, thus reducing the likelihood that employees would use local parks and recreational facilities. Lastly, the Project would not include recreational facilities available to the public. Any impacts related to the potential development of fitness amenities for Project employees has been evaluated as part of overall Project impacts. Therefore, as concluded in the Initial Study, impacts related to parks and recreational facilities would be less than significant.

o. Transportation (Hazards Due to a Geometric Design Feature; Inadequate Emergency Access)

The Project Site is located in an urbanized area developed with numerous roadways and infrastructure. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. In addition, the Project would not include any new public roads that would result in an increase in hazards due to a design feature.

As previously discussed, the Project would make use of the existing driveways and pedestrian entrances located around the Project Site perimeter and would add six new vehicular entry points and five new pedestrian gates to improve accessibility, walkability, and vehicular circulation. The proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding Project Site access and would incorporate pedestrian warning systems, as appropriate. Ride-share pick-up/ drop-off zones could be located at Beverly Boulevard, Fairfax Avenue and/or at the Southern Shared Access Drive. Pedestrian access would be provided along all street and alley frontages, and all access points would be controlled with gates and/or staffed guard houses. Relative to on-site circulation, as discussed in Section II, Project Description, of this Draft EIR, the Project would incorporate a multi-level circulation plan to meet the demands of a large-scale studio campus, with a main (ground) level, or production activity level, providing direct access to the sound stages for vehicles and pedestrians, and a lower (subterranean) level, or production operations level, to house production vehicles and store equipment. Additionally, the proposed Mobility Hub would provide an off-street space for Television City employees and visitors to access passenger pick-up/drop-off zones,

carpools, vanpools, shuttles, ride-share, taxi, and other commercial and non-commercial vehicles, and the temporary parking of buses on the Project Site.

The City's *Vision Zero: Eliminating Traffic Deaths in Los Angeles by 2025* (Vision Zero) has identified the High Injury Network (HIN), a network of streets based on collision data from the last five years, where strategic investments will have the biggest impact in reducing death and severe injury. Within the Project area, Fairfax Avenue, Beverly Boulevard, and West 3rd Street have been identified in the HIN. Vision Zero promotes projects designed to increase safety on these City streets, and improvements such as the installation of a new rectangular rapid flash beacon at Fuller Avenue & Beverly Boulevard and left-turn phasing at the signalized intersection of Martel Avenue/Hauser Boulevard & West 3rd Street are planned within the Project vicinity. The Project improvements to the pedestrian and vehicular environment would prioritize safety and access for all individuals and thus would not preclude future Vision Zero safety improvements by the City. Thus, the Project would not conflict with Vision Zero or exacerbate safety issues associated with the HIN.

Similarly, the Mobility Plan 2035 identifies key corridors as components of various mobility-enhanced networks. Each network is intended to focus on improving a particular aspect of urban mobility, such as transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. Within the Project area, segments of Fairfax Avenue, Beverly Boulevard, and West 3rd Street have been designated as part of the Transit Enhanced Network (TEN) and the Pedestrian Enhanced District (PED), and these same streets as well as The Grove Drive south of Caruso Place have been designated for future bicycle lane or sharrow implementation in the Bicycle Lane Network (BLN). In addition, The Grove Drive/Stanley Avenue north of Caruso Place is part of the Neighborhood Enhanced Network (NEN). The Project's access and circulation improvements and proposed Mobility Hub would complement these designations and future facilities planned in the area by the City.

In addition, the Project would not introduce any incompatible uses, as the proposed uses are consistent with the types of studio and related commercial uses already present on-site. Thus, as concluded in the Initial Study, a less than significant impact related to increased hazards due to a design feature or incompatible use would occur.

With respect to emergency access, according to the City's General Plan Safety Element, the nearest disaster routes in the Project area are Beverly Boulevard, adjacent to the Project Site's northern property line, and La Cienega Avenue, approximately one mile to the west. While it is expected that the majority of Project construction activities would be confined on-site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be

implemented to ensure adequate circulation and emergency access. With regard to operation, the Project does not propose the closure of any local public streets, and primary access to the Project Site would continue to be provided from the adjacent roadways. In addition, the Project would comply with LAFD access requirements, including required fire lane widths, turning radii, secondary access, etc., and plot plans would be submitted to LAFD for approval. Therefore, as concluded in the Initial Study, the Project would not result in inadequate emergency access to the Project Site or surrounding uses, and impacts regarding emergency access would be less than significant.

p. Utilities and Service Systems (Solid Waste)

Pursuant to the requirements of SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of 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. Furthermore, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project's general contractor and/or subcontractors would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility.

Based on construction and debris rates established by the U.S. Environmental Protection Agency (USEPA) and after accounting for mandatory recycling, the Project would include the disposal of an estimated 10,398 tons of construction-related waste. It should be noted that soil export is not included in the calculation of construction waste since soil is not disposed of as waste but, rather, is typically used as a cover material or fill at other construction sites requiring soils import. Given the remaining permitted capacity at 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-related solid waste disposal needs. Specifically, the Project's estimated one-time disposal need of an estimated 10,398 tons of construction-related waste represents approximately 0.0177 percent of the remaining capacity (58.84 million tons) at the Azusa Land Reclamation facility and 0.0070 percent of the remaining capacity (148.40 million tons) at the Class III landfills serving the County.

Based on the above, Project construction would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, as concluded in the Initial Study, construction impacts to solid waste facilities would be less than significant.

Upon full buildout, operation of the Project would result in a net increase in solid waste disposal of approximately 643 tons per year. While this estimate accounts for recycling and other waste diversion measures consistent with the Citywide diversion rate of 76.4 percent, it does not include implementation of the City's Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by 2025. The Project's estimated net increase of 643 tons per year for solid waste disposal represents approximately 0.0004 percent of the remaining capacity (148.40 million tons) at the Class III landfills serving the County.

The County will continue to address landfill capacity through the preparation of Countywide Integrated Waste Management Plan (CoIWMP) annual reports. The preparation of each annual report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Solid waste disposal is an essential public service that must be provided without interruption in order to protect public health and safety, as well as the environment. Jurisdictions in the County of Los Angeles continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning directives. These efforts, together with countywide and regional programs implemented by the County and the cities, acting in concert or independently, have achieved significant, measurable results, as documented in the 2019 CoIWMP Annual Report. The Project would be consistent with and would further City policies that reduce landfill waste streams. Such policies and programs serve to implement the strategies outlined in the 2019 CoIWMP Annual Report to adequately meet future countywide disposal needs without capacity shortages.[3]

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste generated by construction and operation of the Project. Therefore, as concluded in the Initial Study, impacts would be less than significant.

The Project would also 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 a specified size. The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling, as well as the City's Curbside Recycling Program. In addition, as discussed above, pursuant to LAMC Sections 66.32 through 66.32.5 (the City's

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

Construction and Demolition Waste Recycling Ordinance No. 181,519), the Project's general contractor and/or subcontractors would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. As concluded in the Initial Study, since the Project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste, impacts would be less than significant.

q. Wildfire

The Project Site is located in an urbanized, generally flat area, and there are no wildlands or steep slopes located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone, nor is it located within a City-designated fire buffer zone. Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. As concluded in the Initial Study, no impacts regarding wildfire risks or related post-fire conditions would occur.