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

INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION

1200 N. Cahuenga Boulevard Project

Case Number: **ENV-2021-10171-MND**

Project Location: 1200 – 1210 N. Cahuenga Boulevard, 6337 – 6357 W. Lexington Avenue, and 6332 – 6356 W. La Mirada Avenue, Los Angeles, California, 90038.

Community Plan Area: Hollywood

Council District: 13—Mitch O'Farrell

Project Description: The 1200 N. Cahuenga Boulevard Project (the "Project") is located at 1200 – 1210 N. Cahuenga Boulevard, 6337 – 6357 W. Lexington Avenue, and 6332 – 6356 W. La Mirada Avenue (the "Project Site") in the City of Los Angeles. The Project proposes to replace an existing, vacant private school campus, the Stratford School, with an approximately 75,262 square-foot creative office campus with a ground-floor retail use. The Project would be comprised of three buildings, Buildings A, B, and C, with an outdoor courtyard located between the buildings. The Project would demolish the school's subterranean parking lot and access ramp, topped with a recreational field and basketball court, and two playgrounds. The Project would also demolish 8,941 square feet of the existing approximately 28,389 square-foot private school building, but would otherwise preserve and upgrade with a few exterior modifications the remaining approximately 19,448 square feet of the building and its subterranean parking garage to be a creative office building (Building B). Building A would be new, located along the northern border of the Project Site, would contain 35,000 square feet, and would be four stories and a maximum of 57' 1" in height. Building B would consist of 19,448 square feet of the existing two-story, 42' 6" tall school building; Building B's unusually tall first story would place its second story approximately in line with the third stories on Buildings A and C. Building C would be new, occupy the southwest corner of the Project Site, would contain approximately 20,814 square feet, and would be four stories and a maximum of 60' 11" in height. All three buildings would provide decks and balconies adjacent to the creative offices. The buildings would surround an outdoor courtyard for the use of the buildings' tenants. The Project would provide 156 vehicular parking spaces and 22 bicycle spaces within the Project's one-level subterranean parking garage, which would extend under both Buildings A and B, and two at-grade parking areas on the first floors of Buildings A and C. The subterranean garage under Building A would contain automated parking stackers. The Project would be built on the 53,557 square-foot Project Site, resulting in a site-wide Floor Area Ratio (FAR) of approximately 1.41 to 1 and a total floor area of 75,262 square feet. Approximately 12,678 cubic yards of dirt is expected to be excavated and exported from the Project Site during construction.

January 2023

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

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

APPLICANT:

BARDAS Investment Group
1015 N. Fairfax Avenue
West Hollywood, California 90046

INITIAL STUDY

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INITIAL STUDY

1 INTRODUCTION

An application for the proposed 1200 N. Cahuenga Boulevard Project has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles, as Lead Agency, has determined that the project is subject to the California Environmental Quality Act (CEQA), and that the preparation of an Initial Study is required.

This Initial Study evaluates the potential environmental effects that could result from the construction and operation of the proposed Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City of Los Angeles uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document.

Based on the analysis provided within this Initial Study, the City of Los Angeles has concluded that, with incorporation of the identified mitigation as agreed to by the Applicant, the Project would not result in significant impacts on the environment and, therefore, that the preparation of an Initial Study/Mitigated Negative Declaration is appropriate under CEQA. This Initial Study and Mitigated Negative Declaration (IS/MND) is intended as an informational document and is ultimately required to be adopted by the decision-making body prior to Project approval by the City of Los Angeles. Because it is an informational document, the Project's effects are shown both without and with incorporation of the mitigation the Applicant has agreed to incorporate into the Project.

1.1 PURPOSE OF AN INITIAL STUDY

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

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but that revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the

effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration nor Mitigated Negative Declaration is appropriate, an EIR is normally required.[1]

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1 INTRODUCTION

Describes the purpose and content of the Initial Study and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.

3 PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.

4 EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

1.3 CEQA PROCESS

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

1.3.1 Initial Study

At the onset of the environmental review process, the City of Los Angeles prepared this Initial Study to determine if the proposed Project may have a significant effect on the environment. This Initial Study determined that the proposed Project could have potentially significant environmental impacts, but that the identified mitigation measures which the Applicant agreed to incorporate into the Project would avoid or reduce such impacts to a point where clearly no significant impacts would occur.

---

1 State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the Lead Agency when there is substantial evidence that the project may cause a significant effect on the environment: "(A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration.

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

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

INITIAL STUDY

2 EXECUTIVE SUMMARY

PROJECT TITLE	**1200 N. Cahuenga Boulevard Project**
ENVIRONMENTAL CASE NO.	**ENV-2021-10171-MND**
RELATED CASES	

PROJECT LOCATION	1200 – 1210 N. Cahuenga Boulevard, 6337 – 6357 W. Lexington Avenue, and 6332 – 6356 W. La Mirada Avenue, Los Angeles, California, 90038
COMMUNITY PLAN AREA	Hollywood
GENERAL PLAN DESIGNATION	Low Medium II Residential
ZONING	RD 1.5-1XL
COUNCIL DISTRICT	13-Mitch O'Farrell

LEAD AGENCY	**City of Los Angeles**
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	Alex Truong, City Planning Associate
ADDRESS	City of Los Angeles Department of City Planning 200 N. Spring Street, Room 763, Los Angeles, CA 90012
PHONE NUMBER	213-978-3308
EMAIL	alexander.truong@lacity.org

APPLICANT	BARDAS Investment Group
ADDRESS	1015 N. Fairfax Avenue, West Hollywood, California 90046
PHONE NUMBER	(323) 461-8815

PROJECT DESCRIPTION

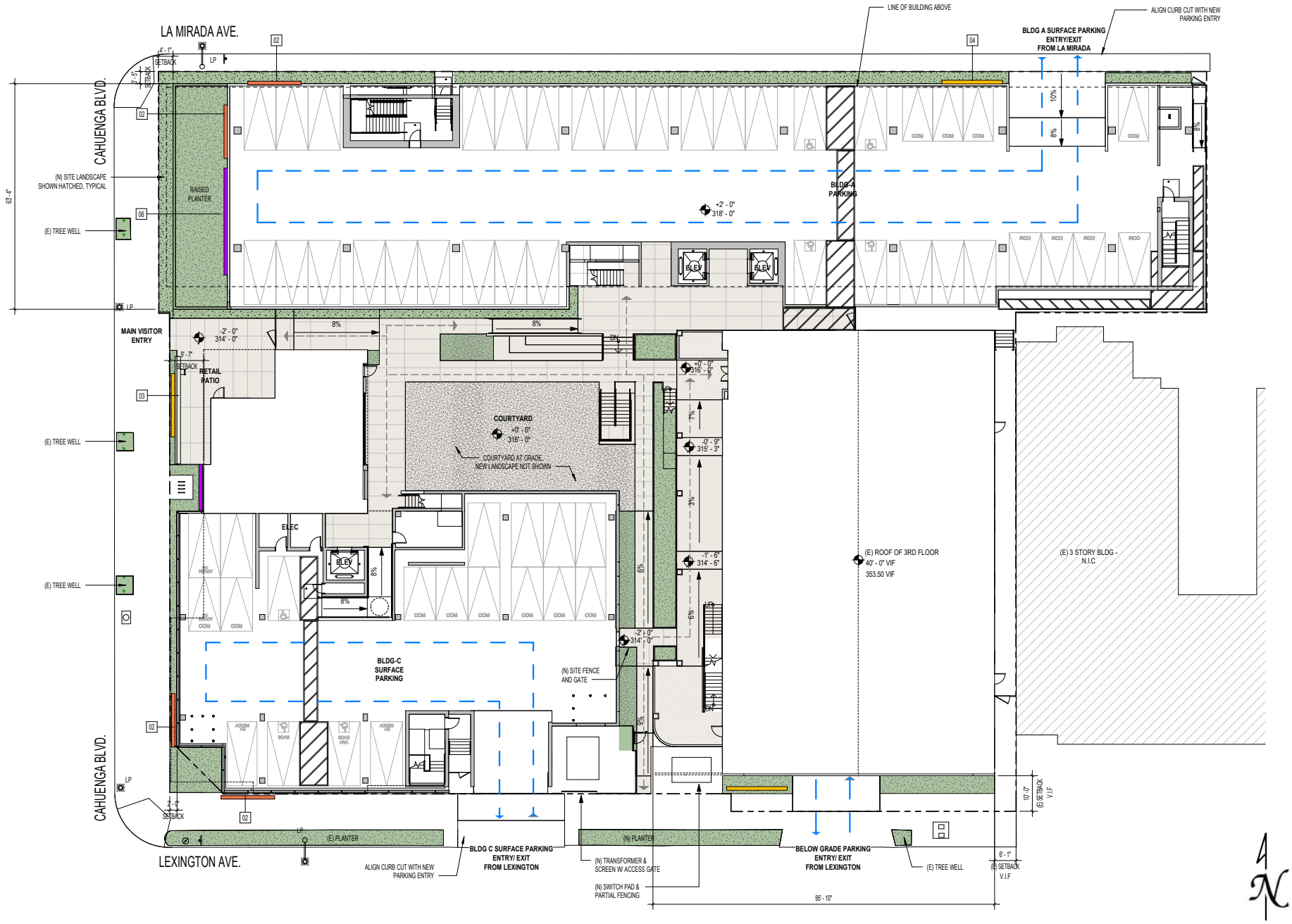
The Project proposes to replace an existing, vacant private school campus, the Stratford School, with an approximately 75,262 square-foot creative office campus with a ground-floor retail use. The Project would include a total of three buildings, Buildings A, B, and C. (Figure 2.1, *Site Plan*.) The Project would demolish the school's subterranean parking lot and access ramp, topped with a recreational field and basketball court, and two playgrounds. The Project would also demolish 8,941 square feet of the existing approximately 28,389 square-foot private school building, but would preserve and upgrade the remaining approximately 19,448 square feet of the building and its subterranean parking garage to be a creative office building.

Building A would be new, located along the northern border of the Project Site, would contain 35,000 square feet, and would be four stories and a maximum of 57' 1" in height. Building B, would consist of 19,448 square feet of the existing two-story, 42' 6" tall school building; Building B's unusually tall first story would place its second story approximately in line with the third story on Building A and on Building C. The third building, Building C would be new, would occupy the southwest corner of the Project Site, would contain approximately 20,814 square feet, and would be four stories and a maximum of 60' 11" in height. The Project's three buildings would provide decks and balconies adjacent to the creative offices and the buildings would surround an outdoor courtyard for the use of the buildings' tenants.

The Project would provide 156 vehicular parking spaces and 22 bicycle spaces within the Project's parking garages. Building A would contain a two-level parking garage, with one screened at-grade parking level and one subterranean level with automated parking stackers. Building A's subterranean parking level would connect to the existing subterranean parking level under Building B. Building C would include a screened at-grade surface parking area.

The Project would be built on the 53,557 square-foot Project Site, resulting in a site-wide Floor Area Ratio (FAR) of approximately 1.41 to 1 and a total floor area of 75,262 square feet proposed by the Project. Approximately 12,678 cubic yards of dirt is expected to be excavated and exported from the Project Site during construction.

The Applicant is requesting the following discretionary approvals: a General Plan Amendment from Low Medium II Residential to Community Commercial and a Zone and Height District Change from RD1.5-1XL to C2-1, which would allow the Project to be developed with a FAR of 1.41:1 and to a maximum height of 62 feet (to the top of the roof parapet). Other discretionary and ministerial permits and approvals that may be deemed necessary, include, but are limited to, haul route approval, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.



Source: West of West, June 2022.

Figure 2.1
Site Plan

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

ENVIRONMENTAL SETTING

The Project Site is comprised of two parcels with Assessor Parcel Number (APN No. 5533-006-035). Parcel A contains Lots 1, 2, 3, 4, 5 and 6 of Track No. 774. Parcel B contains Lots 19, 20, 21, 22, 23, 24, and 25 of Track No. 4622. The Project Site is located at 1200 – 1210 N. Cahuenga Boulevard, 6337 – 6357 W. Lexington Avenue, and 6332 – 6356 W. La Mirada Avenue, and is bounded by Lexington Avenue to the south, by residential uses to the east, by N. Cahuenga Boulevard to the west, and by La Mirada Avenue to the north. The Project Site is rectangular in shape and totals 53,557 square feet in area. The Project Site is currently zoned RD1.5-1XL and is located within the Hollywood Community Plan Area. The RD1.5-1XL designates the land use of the property as Low Medium II Residential. Height District No. 1XL, restricts the height of development to 30 feet, two stories, and a FAR of 3:1. The relatively flat Project Site is currently developed with the Stratford School, which is now vacant, one recreational field and a basketball court over a below-grade parking garage with an access ramp, and two playgrounds. The two-story 28,389 square-foot school building, a portion of which would be retained as Building B by the Project, is located adjacent to Lexington Avenue and N. Cahuenga Boulevard. The building south of La Mirada Avenue with the underground parking garage and access ramp that is topped by the recreational field and basketball court would be demolished by the Project, as would the two playgrounds, which are located at the center of the Project Site and at its northwest corner. The Project Site contains vegetation landscaping and 14 non-protected trees.

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

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

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

CALIFORNIA NATIVE AMERICAN CONSULTATION

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

Yes, a notification was sent on March 31, 2021 to ten tribes and a formal consultation was requested on April 6 and consultation information was provided on November 17, 2022.

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

Alex Truong, City Planning Associate _____

PRINTED NAME, TITLE **DATE**

EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

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

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

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

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

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

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

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

9) The explanation of each issue should identify:

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

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

INITIAL STUDY

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Project proposes the construction of a creative office complex on the currently fully developed urban Project Site located at 1200 – 1210 N. Cahuenga Boulevard, 6337 – 6357 W. Lexington Avenue, and 6332 – 6356 W. La Mirada Avenue within the Hollywood Community Plan area in the City of Los Angeles. The Project would be comprised of three buildings, Buildings A, B, and C, surrounding an outdoor courtyard. (See Figure 2.1, *Site Plan* above.) The Project would include demolition of 8,941 square feet of the existing two-story, approximately 28,389 square-foot, Stratford School Building (Building B), a separate below-grade parking garage and access ramp topped by one recreational field and a basketball court, and two playgrounds; construction of Buildings A and C, totaling 55,814 square-feet; and a few exterior modifications to the remaining approximately 19,448 square-feet of the existing two-story building, Building B, that would leave the majority of that building intact. The Project would provide 156 vehicular parking spaces and 22 bicycle spaces within the one-level subterranean parking garage extending under Buildings a and B and two at-grade parking areas in Buildings A and C. The Project would be built on a 53,557 square-foot lot, resulting in a site-wide Floor Area Ratio (FAR) of approximately 1.41 to 1, and would be a maximum of 62 feet in height (to the top of the roof parapet).

3.2 ENVIRONMENTAL SETTING

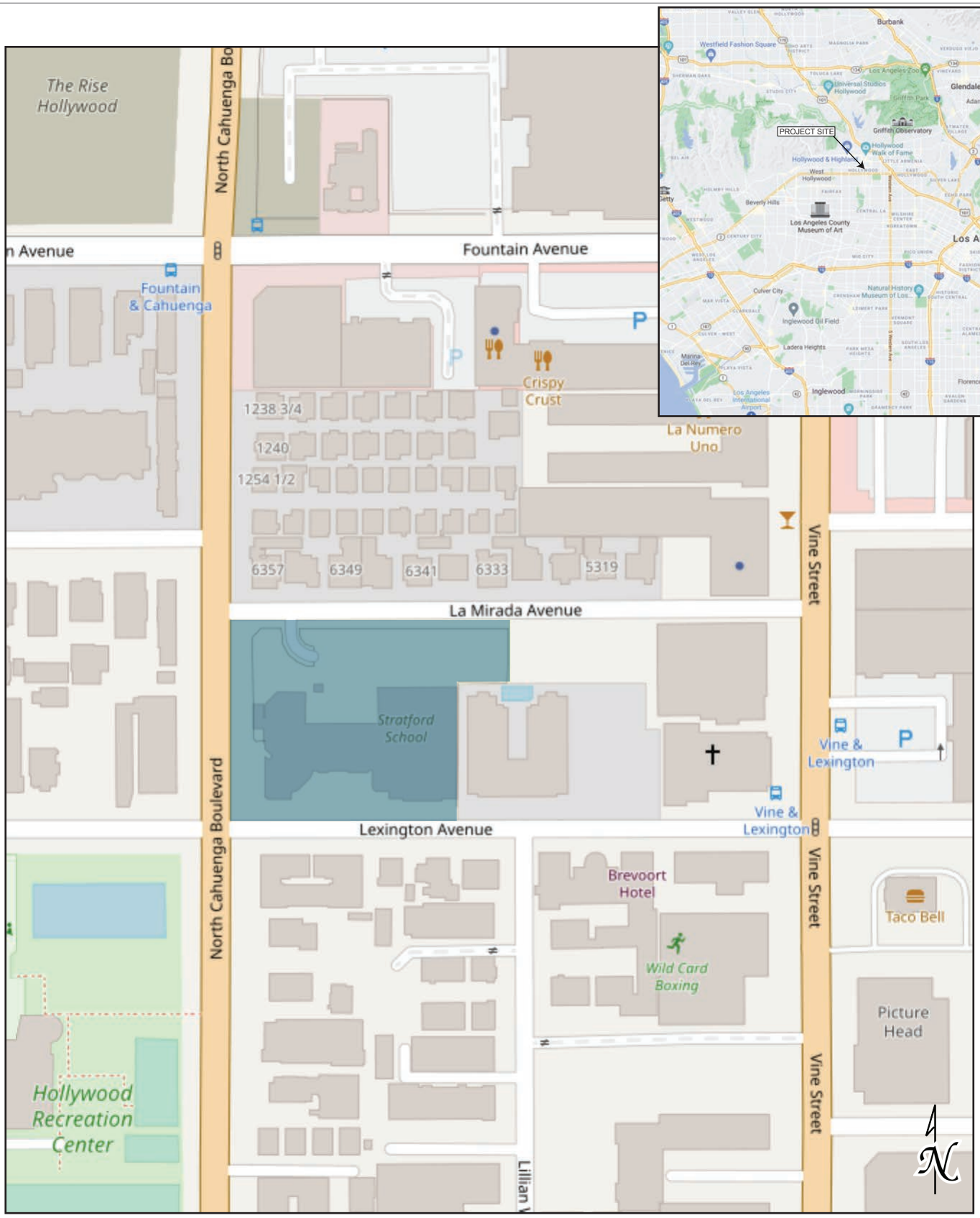
3.2.1 Project Location

The Project Site is located at 1200 – 1210 N. Cahuenga Boulevard, 6337 – 6357 W. Lexington Avenue, and 6332 – 6356 W. La Mirada Avenue, and is bounded by Lexington Avenue to the south, by residential uses and ultimately by Vine Street to the east, by N. Cahuenga Boulevard to the west, and by La Mirada Avenue to the north. The Project Site's location within the City of Los Angeles and greater Los Angeles region is depicted in Figure 3.1, *Regional and Vicinity Map*.

Regional access to the Project Site is provided by the 101 Freeway, located approximately 0.86 mile east of the Project Site. Local access to the Project Site is provided via N. Cahuenga Boulevard and Lexington Avenue.

3.2.2 Existing Conditions

The Project Site is comprised of two parcels with Assessor Parcel Number (APN No. 5533-006-035). Parcel A contains Lots 1, 2, 3, 4, 5 and 6 of Track No. 774. Parcel B contains Lots 19, 20,



Project Site

Source: OpenStreetMap, August 2021.

Figure 3.1
Regional Vicinity Map

21, 22, 23, 24, and 25 of Track No. 4622. The Project Site is rectangular in shape and totals 53,557 square feet in area. The relatively flat Project Site is currently developed with the Stratford School, which is now vacant, one recreational field and one basketball court over a below-grade parking garage with an access ramp, and two playgrounds. As shown in Figure 3.2 *Aerial Map*, and Figure 3.3, *Existing Site Photos*, the two-story 28,389 square-foot school building, a portion of which would be retained as Building B by the Project, is located adjacent to Lexington Avenue and N. Cahuenga Boulevard. The building south of La Mirada Avenue with the underground parking garage and access ramp that is topped by the recreational field and basketball court would be demolished by the Project, as would the two playgrounds, which are located at the center of the Project Site and at its northwest corner. The Project Site currently contains vegetation landscaping and 14 non-protected trees.

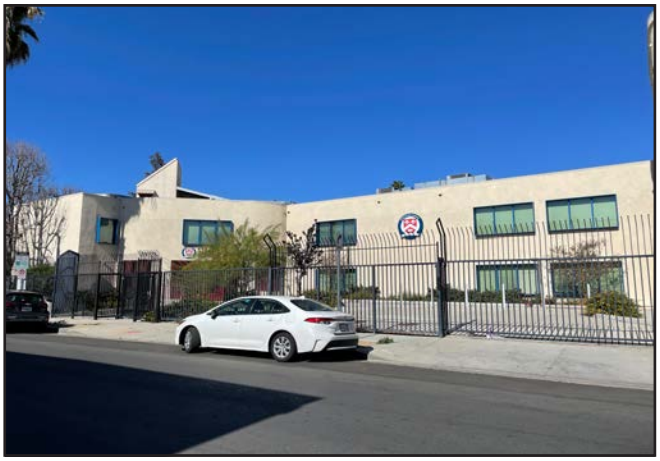
The Project Site is zoned RD1.5-1XL and is located within the boundaries of the Hollywood Community Plan, which is one of the 35 Community Plans that form the Land Use Element of the General Plan for the City of Los Angeles. The entire Project Site is designated Low Medium II Residential under the Hollywood Community Plan. The Project Site is located in Height District No. 1XL, which restricts the height of development to 30 feet, two stories, and a FAR of 3:1 as shown in Figure 3.4, *Zoning and General Land Use Designation*.

As provide in the City of Los Angeles Department of City Planning, Zone Information & Map Access System (Zimas) the Project Site is neither located within the boundaries of nor subject to any Specific Plan, Community Design Overlay, or Interim Control Ordinance.[2] The Project Site is located in the Los Angeles State Enterprise Zone (ZI-2374), and a City of Los Angeles Transit Priority Area (ZI-2452). The Project Site is not located within a Hillside Area or subject to Hillside Construction Regulation, Bureau of Engineering designated Special Grading Area, Historic Preservation Review or Overlay Zone, or a Clean Up-Green Up (CUGU) area. The Project Site is not located within a Very Hight Fire Severity Zone, Flood Zone, Watercourse, Hazardous Waste zone, a High Wind Velocity zone, a BOE Special Grading Area, Landslide area, Preliminary Fault Rupture Study Area, a Tsunami Inundation Zone, Liquefaction zone, or Alquist-Priolo zone. The Project Site is located within approximately 1.64 kilometers of the nearest fault, the Hollywood Fault. The Project Site is located within an Urban Agriculture Incentive Zone; however, the Project does not involve a contract to use vacant property for agricultural purposes in exchange for reduced property taxes. The Project Site is not located in a Methane zone.

2 City of Los Angeles Department of City Planning, Zone Information & Map Access System, http://zimas.lacity.org/, accessed August 2022.

Project Site
Source: Google Earth, August 2022.

Figure 3.2
Aerial Map



View 1: View to the northwest of the Project Site.

View 2: View to the northeast of the Project Site.

View 3: View to the southeast of the Project Site.

PHOTO LOCATION MAP

Source: GoogleEarth, February 2022.

Figure 3.3
Existing Site Photos
Views 1, 2, and 3

Project Site

Source: City of Los Angeles Planning Zimas Maps, August 2021.

Figure 3.4
Zoning and General Land Use Designation

3.2.3 Surrounding Land Uses

The Project Site is located in a fully developed urban area characterized by low- to mid-rise buildings. The Project Site is bounded by Lexington Avenue to the south, by residential uses and ultimately by Vine Street to the east, by La Mirada Avenue to the north, and by N. Cahuenga Boulevard to the west.

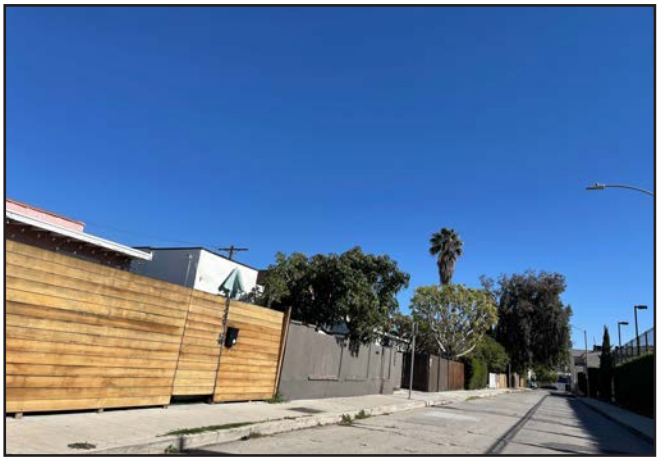
Figures 3.5 and 3.6, *View of Surrounding Land Uses*, depict the existing conditions of the surrounding land uses. Surrounding land uses are comprised of a mix of multi-family residential and commercial uses to the north, south, east, and west of the Project Site, and the Hollywood Pool recreational facility to the southwest of the Project Site. Nearby structures vary in height, building style and construction.

North: North of the Project Site across La Mirada Avenue are one-story single family residential uses. Farther northeast of the Project Site is a surface parking lot, and the one-story Stage Jewelry & Loan Company Pawn Shop. The residential uses are zoned RD1.5-1XL with a General Plan land use designation of Low Medium II Residential. The commercial use is zoned C2-1D with a General Plan land use designation of Highway Orientated Commercial. Farther northeast of the Project Site on Fountain Avenue is the three-story Pickford Center for Motion Picture Study and the Academy of Motion Picture Arts and Sciences Building and the seven-story Rise Residential Building.

East: East and adjacent to the Project Site is a three-story residential use. The residential use is zoned RD1.5-1XL with a General Plan land use designation of Low Medium II Residential. Farther east of the residential use is a vacant lot and Vine Street, which is lined with one to five story commercial developments. The Hampton Inn Suits is a five-story hotel, the Taglyan Complex is a two-story structure, and the Villa Elaine is a four-story mixed-use.

South: Immediately south of the Project Site across Lexington Avenue is a three-story residential use and two one-story residential uses. The residential uses are zoned R3-1XL with a General Plan land use designation of Medium Residential. Farther south on N. Cahuenga Boulevard is a four-story residential use also zoned R3-1XL with a General Plan land use designation of Medium Residential. Farther south at the corner of Lillian Way are three-story and four-story residential structures.

West: West of the Project Site across N. Cahuenga Boulevard is a two-story residential use and a one-story residential use. The residential uses are zoned RD1.5-1XL with a General Plan land use designation of Low Medium II Residential. Farther west are two- and three-story residential uses. The Stevenson Manor residential structure is located farther west on La Mirada Avenue. Southwest is the Hollywood Pool recreational facility, which is zoned OS-1-1XL with a General Plan land use designation of Open Space.



View 1: View to the northeast of the residential uses.

View 2: View to the north of the Stage Jewelry & Loan Company Pawn Shop.

View 3: View to the northeast of the three-story residential use.

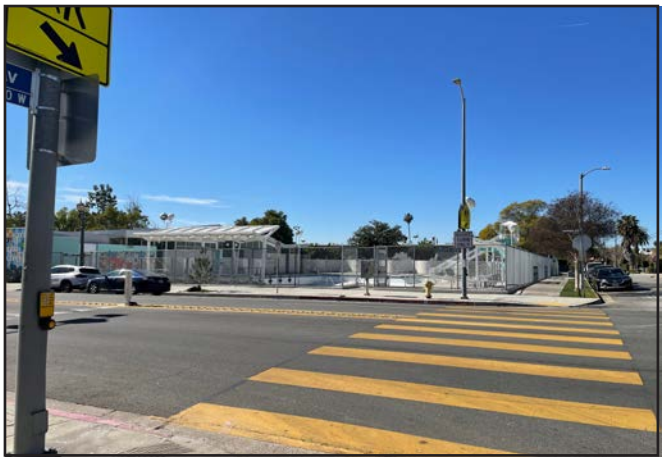
PHOTO LOCATION MAP

Source: GoogleEarth, February 2022.

Figure 3.5
View of the Surrounding Land Uses
Views 1, 2, and 3

View 4: View to the southwest of the three-story residential use.

View 5: View to the southeast of the one- and three-story residential uses.



View 6: View to the southwest of the Hollywood Pool Recreational Facility.

PHOTO LOCATION MAP

Source: GoogleEarth, February 2022.

Figure 3.6
View of the Surrounding Land Uses
Views 4, 5, and 6

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Project proposes to replace an existing, vacant private school campus at the Project Site with an approximately 75,262 square-foot creative office campus with a ground-floor retail use, the details of which are shown in Table 3.1, *Project Development Summary*. The Project is comprised of three buildings, Buildings A, B, and C, surrounding an outdoor courtyard. The Project would demolish the school's subterranean parking lot and access ramp, topped with a recreational field and basketball court, and two playgrounds. The Project would also demolish 8,941 square feet of the existing approximately 28,389 square-foot school building, but would preserve and upgrade with a few exterior modifications the remaining approximately 19,448 square feet of the building and its subterranean parking garage to be a creative office building (Building B).

Table 3.1
Project Development Summary[a]

Size	Total
Creative Office Project	
Existing Creative Office Use	*19,448 sf*
Creative Office Use	*55,814 sf*
Retail Use	*500 sf*
Total Office Project Square Footage	**75,262 sf**
Parking Spaces	
At-Grade	*55*
Subterranean Level 1	*101*
Total Parking Spaces	**156**
Bicycle Parking – Long Term	*14*
Bicycle Parking – Short Term	*8*
Total Bicycle Storage	**22**
Open Space	
Open Space	*14,667 sf*
Total Common Open Space	***14,667 sf***
Landscaping	
Landscaping	*11,419 sf*
Total Landscaping	***11,419 sf***

Notes:
sf = square feet
[a] *19,448 sf of existing uses to remain.*
Source: House & Robertson Architects July 2021.

Building A

Building A, located along the northern portion of the Project Site south of La Mirada Avenue, would be a new four-story, approximately 35,000 square-foot building with one level of surface parking and one level of below-grade parking with an automated parking stacker system. Building A's subterranean parking level would connect to Building B's subterranean parking level. Building A would include a covered and open outdoor terrace, an elevator core and exterior egress stairs, and a partial-level fourth floor with adjacent roof deck and shade canopy.

Building A's subterranean parking garage would be a one-level below-grade structure that would include electrical rooms, mechanical rooms, recycling and trash rooms, bicycle parking spaces and vehicular parking spaces and mechanical parking stackers.

Building B

Building B would consist of the remaining portion of the existing two-story school building; as such, it would be an approximately 20,000 square-foot building above a one-level existing below-grade parking structure. The majority of building B would remain intact, with the following exceptions: new exterior paint, new exterior façade over the existing building façade (south elevation only), modifications to and replacement of select exterior windows and doors, and a new two-story exterior egress stair.

Building C

Building C would be a new-four story, approximately 20,000 square-foot building with one level of surface parking. Building C would include three individual, multi-story "suites" connected by outdoor terraces, decks, stairs, and an elevator. The suites would be located on a concrete podium over the surface parking. The main visitor entrance would be from Lexington Avenue between Building B and the surface parking within Building C.

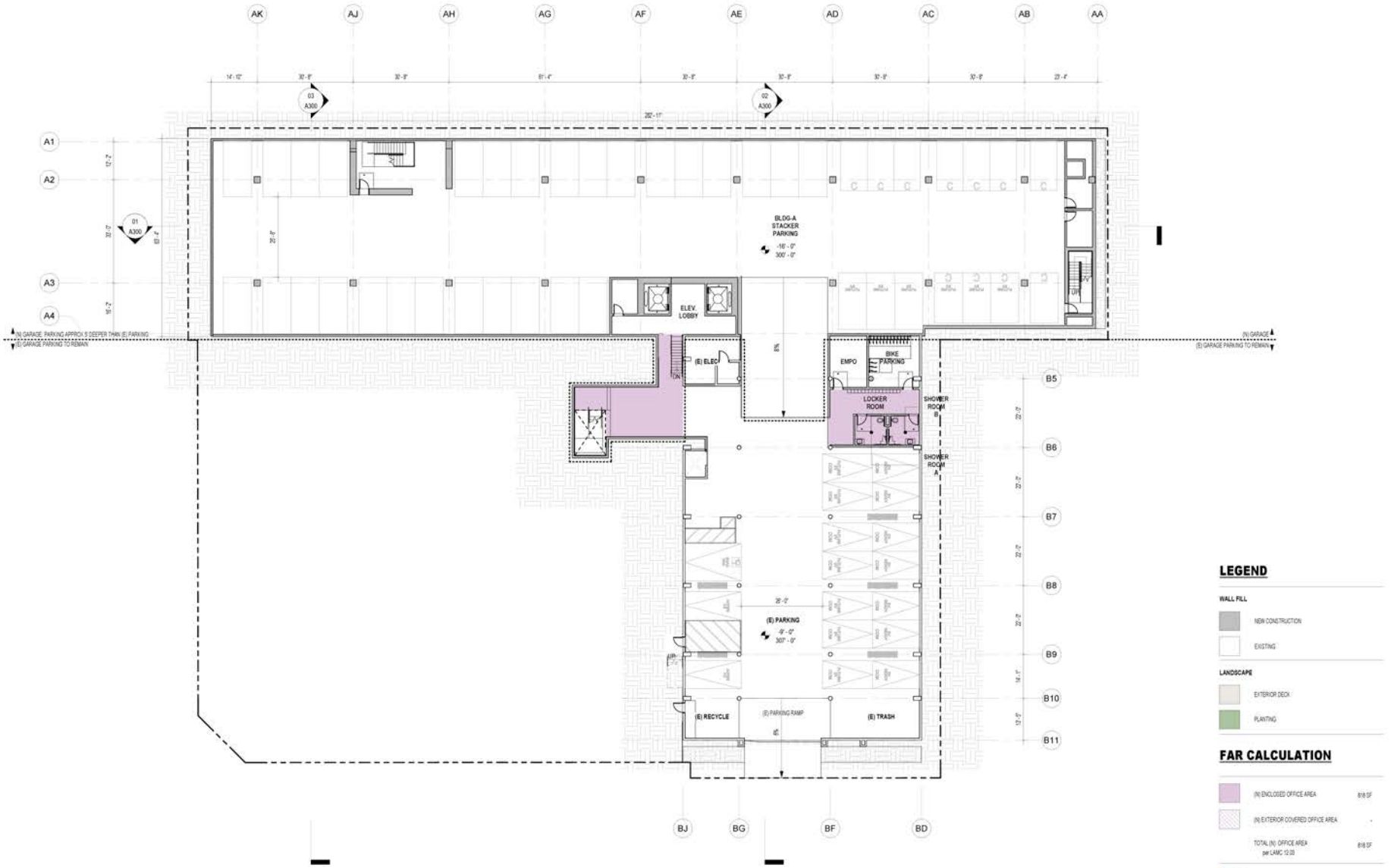
The ground floor of the office building would include electrical rooms and vehicular parking spaces. The ground floor of the office building would also include retail and office space.

The second floor would include office space and office services. The third floor would include office space and office services, and exterior decks. The fourth floor would include office space and office services, and a deck and a roof over Building B. The retail space would be open to the public.

The proposed layout of the Project is illustrated by the floor plans in Figures 3.7 through 3.12. The elevation plans are shown in Figures 3.13 through 3.16.

Zoning, Floor Area and Building Height

The Project Site is currently zoned RD1.5-1XL and is located within the Hollywood Community Plan Area. The RD1.5-1XL designates the land use of the property as Low Medium II Residential. Height District No. 1XL, restricts the height of development to 30 feet, two stories, and a FAR of 3:1. The Applicant has requested a General Plan Amendment and Zone Change from RD1.5-1XL to C2-1, which would allow the Project Site to be developed with a FAR of 1.41:1 and to a maximum height of 62 feet.



Source: West of West, October 2021.

Figure 3.7
Basement Level

Source: West of West, June 2022.

Figure 3.8
First Floor

Source: West of West, June 2022.

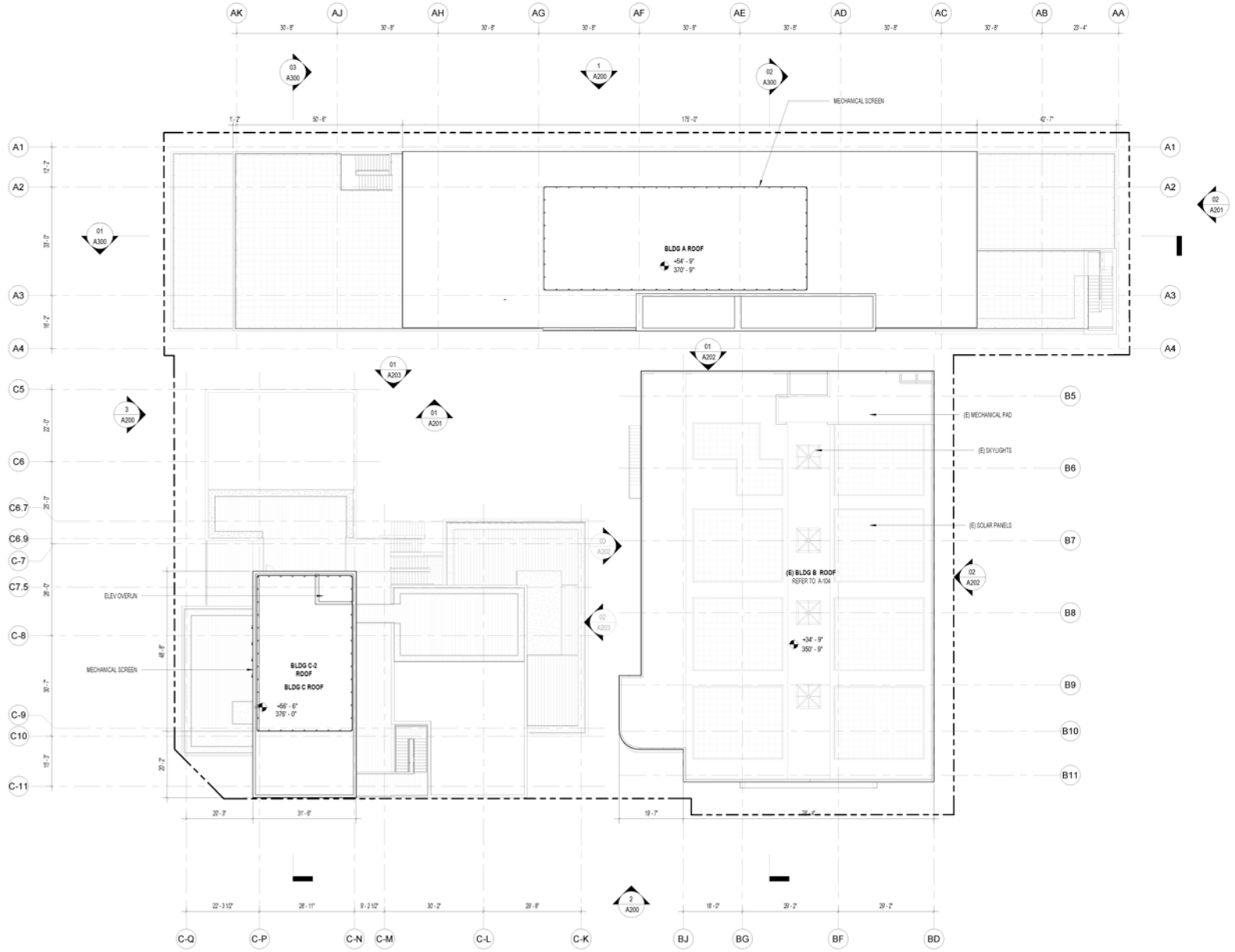
Figure 3.9
Second Floor

Source: West of West, June 2022.

Figure 3.10
Third Floor

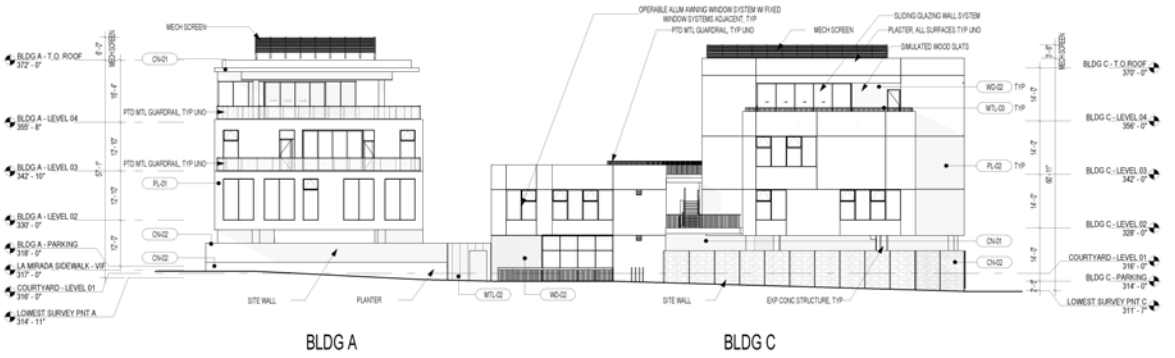
Source: West of West, June 2022.

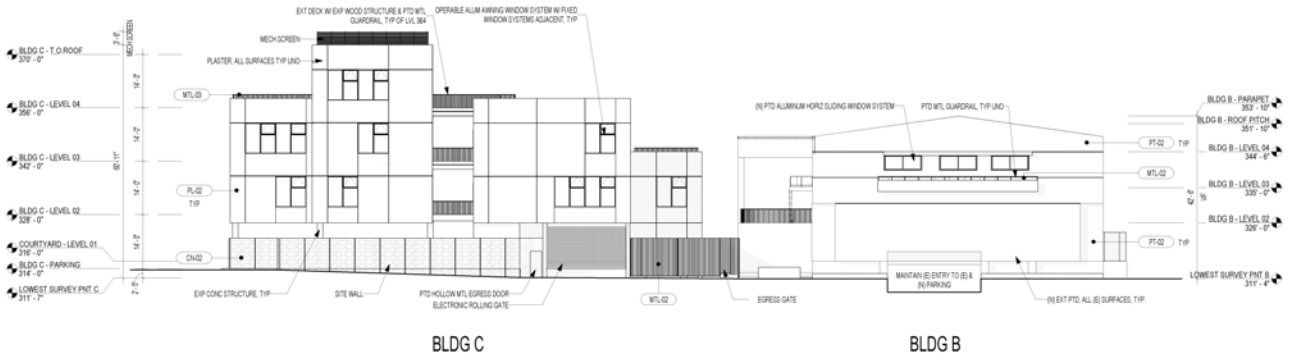
Figure 3.11
Fourth Floor

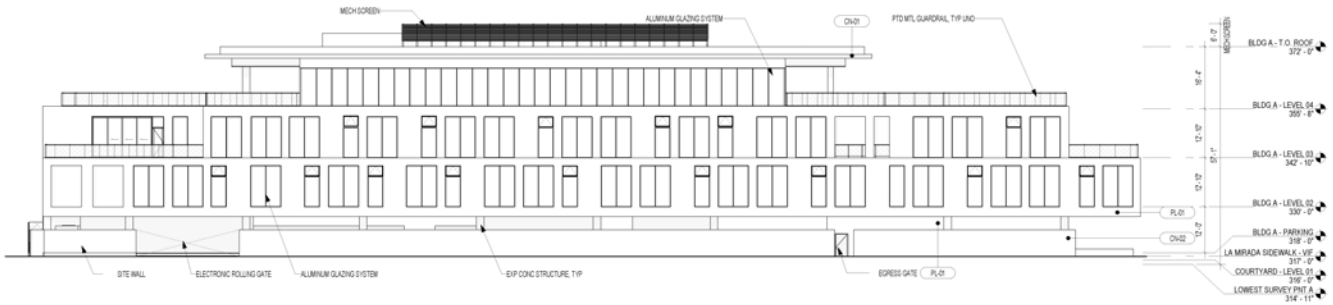


Source: West of West, June 2022.

Figure 3.12
Roof Plan

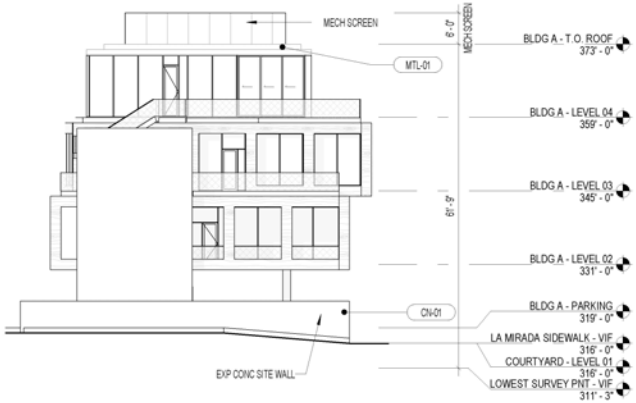




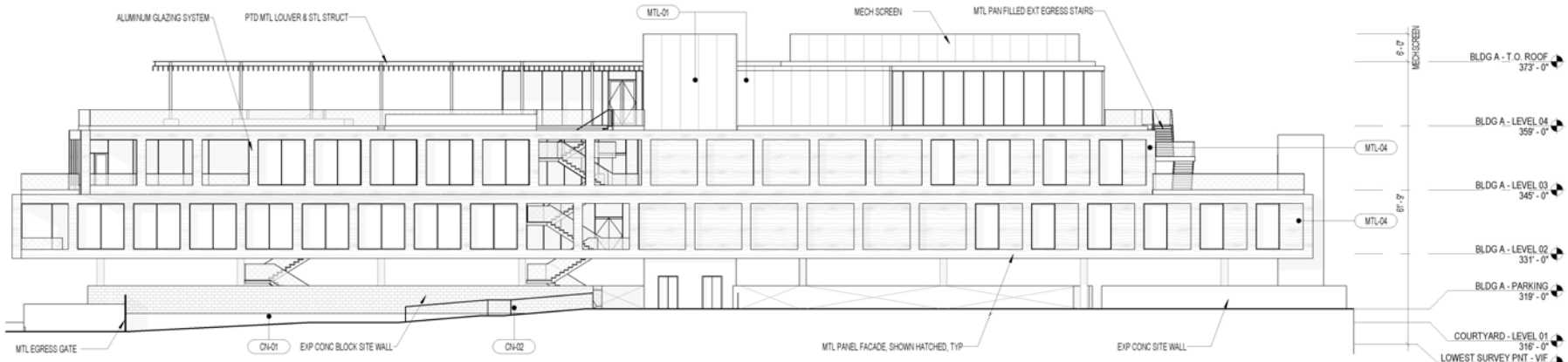


Source: West of West, June 2022.

Figure 3.13
Overall Elevations



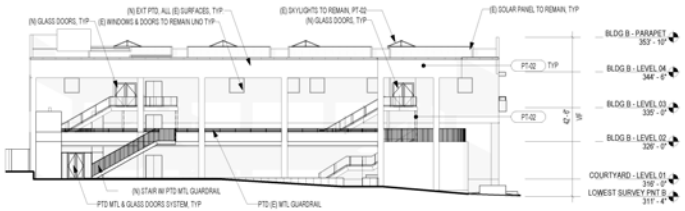
BLDG A - EAST ELEVATION | 1/16" = 1'-0" | 02



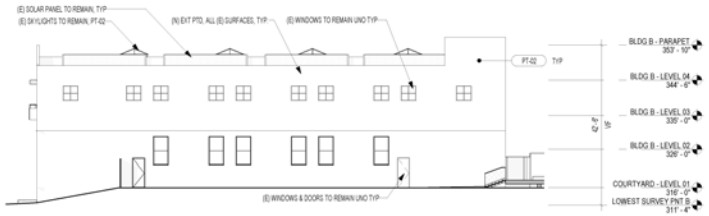
BLDG A - SOUTH ELEVATION | 1/16" = 1'-0" | 01

Source: West of West, June 2022.

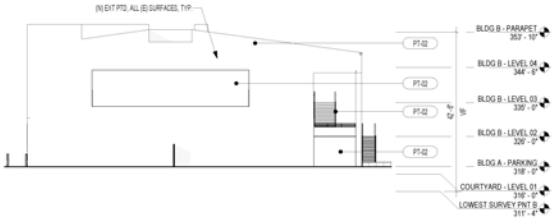
Figure 3.14
Building A Elevations



BLDG B - WEST ELEVATION | 1/16" = 1'-0" | 03



BLDG B - EAST ELEVATION | 1/16" = 1'-0" | 02

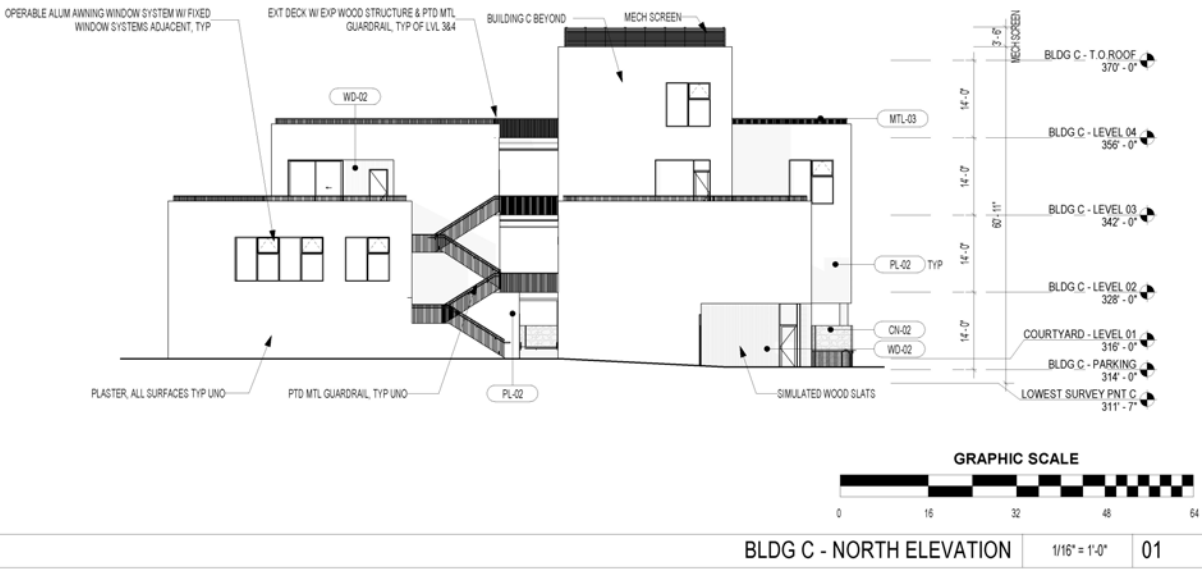


BLDG B - NORTH ELEVATION | 1/16" = 1'-0" | 01

Source: West of West, June 2022.

Figure 3.15
Building B Elevations

BLDG C - EAST ELEVATION | 1/16" = 1'-0" | 02



BLDG C - NORTH ELEVATION | 1/16" = 1'-0" | 01

Source: West of West, June 2022.

Figure 3.16
Building C Elevations

3.3.2 Design and Architecture

The four-story maximum creative office complex would be formed by 3 buildings. As shown in Figure 3.17, *Architectural Rendering of the Project*, the 3 buildings would be different in material, color, form, shape, and proportion, but would work together around a central courtyard. Each building would maintain its own identity, while working with the adjacent buildings to form a cohesively designed Project.

Building A's façade would be comprised of a regular grid of square windows and a thickened "frame" assembly of even width and depth on all sides. The regular grid, in addition to increasing construction efficiency, would contrast and enhance the effect of the building's stacked shape. The façade would be clad in a light-colored metal panel. Soffits and overhangs would be clad to match. Concrete pedestal pavers and silver aluminum would accent the metal panels.

The stucco façade of the existing Building B's would be repainted a deep green. Select areas would be over-clad with metal panel, perforated metal panel, and exterior wall tile in a similar color. The result would be a rich tone on tone palette, as an adjacent backdrop to Building A & C.

Building C's would be comprised of three distinct suites, or bungalows. It would use a stucco system façade with wood accents to evoke house-like characteristics. Circulation between suites would be along exterior wood deck walkways. Each suite would also have access to private decks with indoor/outdoor connections.

Project Site Improvements surrounding the building would include curb adjustments, and new sidewalks as required. The streetscape design would be supportive of the street life characteristics of Lexington Avenue. New street trees would be provided in accordance with City of Los Angeles recommendations.

At its maximum height of 62 feet in height to the top of the roof parapet, the proposed buildings would be similar to the height of nearby residential and commercial uses in the vicinity of the Project Site. In addition, the proposed design would be compatible with the design elements of surrounding office buildings in the Hollywood area.

3.3.3 Open Space and Landscaping

Additional Project Site improvements would include planting at grade along the facades on Lexington Avenue and N. Cahuenga Boulevard as well as in the courtyard, on the upper-level terraces, and on the decks. This shared courtyard between the buildings would be delineated from the surface parking through plantings as well as ground pavers.

Currently, the Project Site contains vegetation landscaping and 14 existing trees (6 street trees and 8 trees located on-site, 0 protected trees). There are 6 street trees; 3 on Lexington Avenue: 1 Mexican Fan Palm / Washingtonia Robusta, 1 Cherry Plum / Prunus Cerasifera, and 1 Natchez Crape Myrtle / Lagerstroemia 'Indica; and 3 street trees on N. Cahuenga Boulevard: 1 Purple

Source: West of West, June 2022.

Figure 3.17
Architectural Rendering of the Project

Orchid Tree / Bauhinia Blakeana, and 2 Pink Trumpet Tree / Handroanthus Heptaphyllu. There are 8 existing trees on-site, 2 Italian Cypress/ Cupressus Sempervirens, 1 Purple Coraltree/Erthrina Fusca, and 1 Palo Verde /Parkinsonia Desert, 1 Coast Redwood / Sequoia Sempervirens, and 3 Sweet Gum / Liquidambar Styraciflua. The Project would require the removal of 8 existing trees on-site but all 6 existing street trees would remain in place. There are no protected species or heritage trees on the Project Site or in the adjacent public right-of-way.

Pursuant to the Los Angeles Municipal Code (LAMC), the existing on-site trees would be required to be replaced at a ratio of 2:1 with a minimum 24" box replacement tree (16 trees). In addition, one tree per 500 square feet of landscaped area (22 trees per 11,419 square foot landscaped area), and three trees per 10,000 square feet of developed area (5 trees per 53,557 square foot developed area), would be required.

LAMC Landscape Ordinance 12.42 C 1.(a) states "at least one tree, which shall not be a palm, shall be provided in the Project for each 500 square feet of landscaped area in the Project." City of Los Angeles Ordinance 2019-0004 §1, 2019, Section 22.126.030.A 1.(c), under Amount of Trees, states "for projects that are non-residential or mixed-use, a minimum of three trees shall be planted for every 10,000 square feet of developed lot area." Thus, a total of 30 trees would be provided as part of the Project. (17 Olea Europaea 'New Wilsonii' / Fruitless Olive, 5 Lagerstroemia X 'Natchez' / Natchez Crape Myrtle, 2 Ligustrum Lucidum / Glossy Privet, and 6 Melaleuca Quinuenervia / Broad-Leaved Paperbark). The Project would also provide 11,419 square feet of landscaping, as shown in Figure 3.18 *Landscaping Ground Level Plan*. Landscaping would be added to the courtyard, terraces, and decks.

Because the Project does not propose any residential uses, no LAMC code-required open space, or recreational space, would be required. Notwithstanding, the Project would provide 14,667 square feet of non-required open space for the tenants as part of its design, intended to promote worker well-being and enjoyment and attract/retain media-focused tenants in Hollywood. This open space would include the courtyard, terraces, and the decks.

3.3.4 Access, Circulation, and Parking

Vehicular access to the Project Site would be via two, two-way entry/exit driveways on Lexington Avenue and a two-way entry/exit driveway on La Mirada Avenue. There would also be an at-grade on-site drop-off area to serve both rideshare arrivals/departures in the surface parking lot on Lexington Avenue.

Parking for the proposed office development would be provided on-site in two at-grade parking levels, one in Building A and one in Building C, and one below-grade subterranean level extending under Buildings A and B. As shown in Table 3.2, *Summary of Required and Proposed Vehicular Parking Spaces*, the Project is required to provide a total of 151 vehicular parking spaces. The Project would provide 156 vehicular parking spaces, located and configured in compliance with applicable requirements of the LAMC. The Project would provide parking both at-grade and in one below-grade level accessed by internal vehicle ramps located at La Mirada Avenue, and Lexington Avenue. As part of the 156 parking spaces, a total of 16 spaces would be designated for clean air vehicles, and 10 spaces would be designated for EV charging stations. Mechanical

Source: West of West, June 2022.

Figure 3.18
Landscaping Ground Level Plan

Table 3.2
Summary of Required and Proposed Vehicular Parking Spaces

Description	Quantity	Rate	Spaces
Required[a]			
Existing Creative Office Use Existing	*19,448 sf*	*2 per 1,000 sf*	*39*
Creative Office Use	*55,314 sf*	*2 per 1,000 sf*	*111*
Retail New	*500 sf*	*2 per 1,000 sf*	*1*
		Required Total	**151**
		Parking Spaces Offset by Bicycle Spaces	**5**
		Minimum Required On-site Parking Spaces	**146**
Proposed			
At-Grade			*55*
Subterranean Level 1			*101*
		Proposed Total	**156**

Notes:
sf = square feet
[a] *Pursuant to LAMC Section 12.21-A, 169a)(2)..*
Source: House & Robertson Architects July 2021.

parking stackers would be provided on the subterranean parking level of Building A. The Project parking is designed for managed parking at all levels (surface and underground). The Project would be consistent with applicable parking requirements of the LAMC.

As shown in Table 3.3, *Summary of Required and Proposed Bicycle Parking Spaces*, the Project is required to provide 22 bicycle parking spaces. The Project would provide 8 short-term bicycle parking spaces and 14 long-term bicycle parking spaces, all located and configured in compliance with applicable requirements of the LAMC. Four showers and a total of 14 lockers would be provided in the subterranean parking facility.

Table 3.3
Summary of Required and Proposed Bicycle Parking Spaces

Description	Quantity	Rate	Spaces
Required[a]			
Bicycle Parking – Long Term	*55,814 sf*	*1 per 5,000 sf*	*14*
Bicycle Parking – Short Term	*55,814 sf*	*1 per 10,000 sf*	*8*
		Required Total	**22**
Proposed			
Bicycle Parking – Long Term	*55,814 sf*	*1 per 5,000 sf*	*14*
Bicycle Parking – Short Term	*55,814 sf*	*1 per 10,000 sf*	*8*
		Proposed Total	**22**

Notes:
sf = square feet
[a] *Pursuant to LAMC Section 12.21-A,16(a)(2).*
Source: House & Robertson Architects July 2021.

3.3.5 Lighting and Signage

The exterior lighting would include soffit downlights in the ground floor covered area, as well as low-level landscape lighting and limited façade up-lighting (including lighting of the feature exterior stair on the east-facing elevation) for pedestrian safety, wayfinding and to highlight key architectural features.

All exterior lighting would meet all applicable LAMC standards and be shielded or directed toward the areas to be illuminated. The exterior lighting would include soffit downlights in the ground floor covered area, as well as low-level landscape lighting and limited façade up-lighting (including lighting of the feature exterior stair on the east-facing elevation) for pedestrian safety, wayfinding and to highlight key architectural features. In compliance with all applicable LAMC standards, exterior lighting on the Project Site would not illuminate adjacent properties, unless otherwise required for other safety purposes as determined by the City of Los Angeles.

The Project would include the following type of signage: monument signs, wayfinding signs, projecting signs, wall signs, illuminated architectural canopy signs, pole signs, roof signs and window signs. Project signage would be illuminated by means of low-level external lighting, internal halo lighting, or ambient light. The Project would not include electronic signage or signs with flashing, mechanical, or strobe lights. In accordance with LAMC Section 14.4.4-E, illumination used for project signage would be limited to a light intensity of 3-foot candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

3.3.6 Site Security

During construction, the Project Site would be secured with perimeter fencing. During Project operations, security would be provided via site planning and secured access points of entry. In addition, the Project would include security cameras, as well as access control to the building, secured parking facility with key system, and well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of building entrances in high-foot traffic areas.

3.3.7 Sustainability Features

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

The Project would include enhanced energy-efficiency via high-performance glazing as well as enhanced roof and deck insulation values in buildings A & C. The air conditioning system would be comprised of highly efficient Variable Refrigerant Flow (VRF) systems allowing for minimal electrical consumption, particularly when the building is lightly occupied. The building systems would include enhanced filtration of outside air being delivered to the occupied areas, and operable windows and sliding glass walls that would enhance the natural ventilation whenever weather conditions permit.

Water usage would be minimized via the use of ultra-low flow plumbing fixtures throughout the project. All roof, balcony and plaza deck drains would feed into a rainwater harvesting cistern, to be used entirely for irrigation of the on-site landscaping.

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

The on-site drop-off areas in the surface parking lot would encourage ridesharing and carpooling, while the below-grade parking would include preferential parking electric parking and low-emitting vehicles with valet drop-off. The project would also provide electric vehicle charging stations. The Project's infill location would promote the concentration of development in an urban location with extensive infrastructure and access to public transit facilities, which would reduce vehicle miles traveled for the office space. As further described in the Energy Use Analysis section in the IS/MND, below, compliance with Title 24 of the California Administrative Code and the L.A. Green Building Code would reduce the Project's energy consumption.

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

3.3.8 Anticipated Construction Schedule

For purposes of analyzing impacts associated with air quality, this analysis assumes a Project construction schedule of approximately 19 months, with construction beginning September 2022 and final buildout occurring in April 2024. Construction activities would be undertaken in four main phases: (1) demolition; (2) grading, excavation, and foundations; (3) building construction; and (4) finishing and architectural coatings. Construction activities would be performed in accordance with all applicable state and federal laws and City of Los Angeles Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City of Los Angeles are 7:00 A.M. to 9:00 P.M. Monday through Friday, and between 8:00 A.M. and 6:00 P.M on any Saturday or national holiday. No construction activities are permitted on Sundays.

Temporary shoring with tie backs or rakers would be used for excavation of the subterranean garage and foundations. The Project would include approximately 12,678 cy of excavation and export. A total of approximately 906 truck trips (assuming 14 cy/load) would be required for export.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. This IS/MND analyzes the potential impacts associated with the Project and provides the environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- **General Plan Amendment.** Pursuant to Los Angeles City Charter (LACC) Sections 555, 556, and 558, and Los Angeles Municipal Code (LAMC) Section 11.5.6, the Applicant seeks a General Plan Amendment from Low Medium II Residential to Community Commercial.
- **Zone and Height District Change.** Pursuant to LAMC Section 12.32, the Applicant seeks a Zone and Height District Change as follows:
    - All Project Site lots: From RD1.5-1XL to C2-1,
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, haul route approval, temporary street closure permits, demolition permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

3.5 RESPONSIBLE PUBLIC AGENCIES

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

- No responsible agencies have been identified for the Project.

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

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

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City of Los Angeles CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA."[3]

PRC Section 21099 applies to the Project. Therefore, analysis of the Project's potential aesthetic impacts is not required. The analysis in this IS/MND is provided for informational purposes only.

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

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

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

No Impact. A significant impact may occur if a proposed project were to introduce incompatible visual elements within a field of view containing a scenic vista or to substantially block a scenic vista. Scenic vistas are generally described in two ways: (1) panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance); and (2) focal views (visual access to a particular object, scene, or feature of interest). Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on a scenic vista is made considering the following factors:

- The nature and quality of recognized or valued views (such as natural topography, settings, man-made or natural features of visual interest, and resources such as mountains or ocean);
- Whether a project affects views from a designated scenic highway, corridor, or parkway;
- The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment); and

- The extent to which a project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.

As discussed in Section 3, Project Description, of this IS/MND, the Project Site is relatively flat, is located in a fully developed urban area, and is bound by Lexington Avenue to the south, by residential uses and then by Vine Street to the east, by N. Cahuenga Boulevard to the west, and by La Mirada Avenue to the north. The Project Site is currently developed with the existing two-story, approximately 28,389 square-foot Stratford School Building, a recreational field, and a below-grade parking garage. Currently, all existing buildings on the Project Site are two-stories high.

With regard to panoramic views, valued visual resources in the vicinity of the Project Site include the Hollywood Hills and the Hollywood Sign, which is City of Los Angeles-designated Historic-Cultural Monument No. 111, both of which are located to the distant north.

Currently, in the vicinity of the Project Site, views of the Hollywood Hills and the Hollywood Sign are only available from east-west running streets when looking north along streets running north-south. Specific to the Project Site, views of the Hollywood Hills and the Hollywood Sign are available looking north from Lexington Avenue along Vine Street east of the Project Site and along N. Cahuenga Boulevard west of the Project Site. However, because of the existing development on the Project Site, no views of either the Hollywood Hills or the Hollywood sign are available looking north, northeast or northwest across the Project Site from Lexington Avenue.

The Project would replace an existing, vacant private school campus that extended across the Project Site with an approximately 75,262 square-foot creative office campus with ground-floor retail uses. The Project would be comprised of three buildings, Buildings A, B, and C. Building A would be approximately 57’ 1” tall and located along the northern side of the Project Site, Building B would be 42’ 6” tall at its highest point and located at the eastern and southern sides of the Project Site, and Building C would be 60’ 11” tall and located along the southern and western sides of the Project Site. Therefore, like the existing development on the Project Site, the Project would, continue to block views of the Hollywood Hills and Hollywood Sign looking north, northeast and northwest across the Project Site. However, like the existing development on the Project Site, the Project would not interfere with views of the Hollywood Hills and the Hollywood Sign that are available when looking north along north-south running roadways. In particular, the Project would not block existing public views of the distant Hollywood Hills or Hollywood Sign when looking north along N. Cahuenga Boulevard or Vine Street. Therefore, the Project would not change or obstruct the distant views of the Hollywood Hills and Hollywood Sign that are currently available.

The Project Site is surrounded by other development, is predominately flat, and is not located within a Hillside Area. The existing viewshed at the Project Site is defined by existing urban development with multi-family residential to the north, south, east, and west of the Project Site.

Overall, as the area is fully developed and highly urbanized, the Project would not have a substantial adverse effect on a publicly available scenic vista. Moreover, pursuant to SB 743 and ZI No. 2452, the Project’s aesthetics impact would not be considered a significant impact on the

environment. **The Project would not directly obstruct an existing public view of a scenic vista as no scenic vistas are near the Project Site vicinity. Therefore, no impacts would occur and no mitigation measures are required.**

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

Less Than Significant Impact. A significant impact may occur only where scenic resources would be damaged or removed by the project. There are no State-designated scenic highways in the Project Site vicinity. The nearest officially eligible state scenic highway is along the Foothill Freeway (I-210), approximately 14 miles northeast of the Project Site,[4] and the nearest City of Los Angeles-designated scenic highway is along Mulholland Drive approximately 7 miles northwest of the Project Site.[5] Therefore, the Project would not substantially damage scenic resources within a state- or City of Los Angeles-designated scenic highway as no scenic highways are located adjacent to the Project Site. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impact would not be considered a significant impact on the environment. In addition, as discussed in response to Checklist Question No. V.a, below, there are no historic buildings located in the vicinity of the Project Site. **Therefore, the Project would not have an impact on scenic resources or historic buildings within a State scenic highway. Therefore, impacts would be less than significant and no mitigation measures are required.**

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

Less Than Significant Impact. A significant impact may occur if, in a non-urbanized area, the project would substantially degrade the existing visual character or quality of the site and its surroundings, or if, in an urbanized area, the project would conflict with applicable zoning or regulations governing scenic quality. The Project Site is located in a fully developed and highly urbanized area in the Hollywood community of the City of Los Angeles; therefore, the applicable threshold with respect to the Project is consistency with applicable zoning and other regulations governing scenic quality.

The Project would replace an existing, vacant private school campus at the Project Site with an approximately 75,262 square-foot creative office campus with ground-floor retail uses. Thus, although the Project would result in a change in the visual character of the development at the Project Site, the change would simply be from one urban use to another.

Zoning Consistency

The Project Site is currently zoned RD1.5-1XL and is located within the Hollywood Community Plan Area. The RD1.5-1XL designates the land use of the property as Low Medium II Residential.

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

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

Height District No. 1XL, restricts the height of development to 30 feet, two stories, and a FAR of 3:1. The Applicant has requested a General Plan Amendment and Zone Change from RD1.5-1XL to C2-1, which would allow the Project Site to be developed with a FAR of 1.41:1 and to a maximum height of 62 feet. With the approval of the requested General Plan Amendment and Zone Change with Project approval, the Project would be consistent with the General Plan and zoning.

The Project Site is located in the Los Angeles State Enterprise Zone (ZI-2374), a Revised Hollywood Injunction (ZI-2433), and a Transit Priority Area in the City of Los Angeles (ZI-2452).

Surrounding Uses

As discussed in Section 3, Project Description, of this IS/MND, the Project Site is located in a fully developed urban area characterized by low- to mid-rise buildings. The Project Site is bounded by Lexington Avenue to the south, by residential uses and ultimately by Vine Street to the east, by La Mirada Avenue to the north, and by N. Cahuenga Boulevard to the west.

Figures 3.5 and 3.6, *View of Surrounding Land Uses*, depict the existing conditions of the surrounding land uses. Surrounding land uses are comprised of a mix of multi-family residential and commercial uses to the north, south, east, and west of the Project Site, and the Hollywood Pool recreational facility to the southwest of the Project Site. Nearby structures vary in height, building style and all are constructed with a variety of styles and materials including stucco, and a variety of sizes of glass windows.

North: North of the Project Site across La Mirada Avenue are one-story single family residential uses. Farther northeast of the Project Site is a surface parking lot, and the one-story Stage Jewelry & Loan Company Pawn Shop. The residential uses are zoned RD1.5-1XL with a General Plan land use designation of Low Medium II Residential. The commercial use is zoned C2-1D with a General Plan land use designation of Highway Orientated Commercial. Farther northeast of the Project Site on Fountain Avenue is the three-story Pickford Center for Motion Picture Study and the Academy of Motion Picture Arts and Sciences Building and the seven-story Rise Residential Building.

East: East and adjacent to the Project Site is a three-story residential use. The residential use is zoned RD1.5-1XL with a General Plan land use designation of Low Medium II Residential. Farther east of the residential use is a vacant lot and Vine Street, which is an Avenue II street that provides two lanes in each direction and is lined with one to five story commercial developments. The Hampton Inn Suits is a five-story hotel, the Taglyan Complex is a two-story structure, and the Villa Elaine is a four-story mixed-use.

South: Immediately south of the Project Site across Lexington Avenue is a three-story residential use and two one-story residential uses. The residential uses are zoned R3-1XL with a General Plan land use designation of Medium Residential. Farther south on N. Cahuenga Boulevard is a four-story residential use also zoned R3-1XL with a General Plan land use designation of Medium Residential. Farther south at the corner of Lillian Way are three-story and four-story residential structures.

West: West of the Project Site across N. Cahuenga Boulevard is a two-story residential use and a one-story residential use. The residential uses are zoned RD1.5-1XL with a General Plan land use designation of Low Medium II Residential. Farther west are two- and three-story residential uses. The Stevenson Manor residential structure is located farther west on La Mirada Avenue. Farther southwest is the Hollywood Pool recreational facility, which is zoned OS-1-1XL with a General Plan land use designation of Open Space.

The Project proposes to replace an existing, vacant private school campus at the Project Site with an approximately 75,262 square-foot creative office campus with ground-floor retail uses, the details of which are shown in Table 3.1, *Project Development Summary*. The Project would cover the existing Project Site with three buildings, Buildings A, B, and C, surrounding an outdoor courtyard. The Project would demolish the school's subterranean parking lot and access ramp, topped with a recreational field and basketball court, and two playgrounds. The Project would also demolish 8,941 square feet of the existing approximately 28,389 square-foot school building, but would preserve and upgrade with a few exterior modifications the remaining approximately 19,448 square feet of the building and its subterranean parking garage to be a creative office building (Building B).

Project Development

Building A

Building A, located along the northern portion of the Project Site south of La Mirada Avenue, would be a new four-story, approximately 35,000 square-foot building with one level of surface parking and one level of below-grade parking with an automated parking stacker system. Building A's subterranean parking level would connect to Building B's subterranean parking level. Building A would include a covered and open outdoor terrace, an elevator core and exterior egress stairs, and a partial-level fourth floor with adjacent roof deck and shade canopy.

Building A's subterranean parking garage would be a one-level below-grade structure that would include electrical rooms, mechanical rooms, recycling and trash rooms, bicycle parking spaces and vehicular parking spaces and mechanical parking stackers.

Building B

Building B would consist of the remaining portion of the existing two-story school building; as such, it would be an approximately 20,000 square-foot building above a one-level existing below-grade parking structure. The majority of building B would remain intact, with the following exceptions: new exterior paint, new exterior façade over the existing building façade (south elevation only), modifications to and replacement of select exterior windows and doors, and a new two-story exterior egress stair.

Building C

Building C would be a new-four story, approximately 20,000 square-foot building with one level of surface parking. Building C would include three individual, multi-story "suites" connected by outdoor terraces, decks, stairs, and an elevator. The suites would be located on a concrete

podium over the surface parking. The main visitor entrance would be from Lexington Avenue between Building B and the surface parking within Building C.

The ground floor of the office building would include electrical rooms, handicap vehicular parking spaces and vehicular parking spaces. The ground floor of the office building would also include retail and office space.

The second floor would include office space and office services. The third floor would include office space and office services, and exterior decks. The fourth floor would include office space and office services, and a deck and a roof over Building B. The retail space would be accessible only to tenants and their guests, and would not be open to the public.

Design and Architecture

The four-story maximum creative office complex would be formed by 3 buildings. As shown in Figure 3.17, *Architectural Rendering of the Project*, the 3 buildings would be different in material, color, form, shape, and proportion, but would work together around a central courtyard. Each building would maintain its own identity, while working with the adjacent buildings to form a cohesively designed Project.

Building A's façade would be comprised of a regular grid of square windows and a thickened "frame" assembly of even width and depth on all sides. The regular grid, in addition to increasing construction efficiency, would contrast and enhance the effect of the building's stacked shape. The façade would be clad in a light-colored metal panel. Soffits and overhangs would be clad to match. Concrete pedestal pavers and silver aluminum would accent the metal panels.

The stucco façade of the existing Building B's would be repainted a deep green. Select areas would be over-clad with metal panel, perforated metal panel, and exterior wall tile in a similar color. The result would be a rich tone on tone palette, as an adjacent backdrop to Building A & C.

Building C's would be comprised of three distinct suites, or bungalows. It would use a stucco system façade with wood accents to evoke house-like characteristics. Circulation between suites would be along exterior wood deck walkways. Each suite would also have access to private decks with indoor/outdoor connections.

Project Site Improvements surrounding the building would include curb cuts, and new sidewalks as required. The streetscape design shall be supportive of the street life characteristics of Lexington Avenue. New street trees shall also be provided in accordance with City of Los Angeles recommendations and per the requirements of the Bureau of Street Services, Urban Forestry Division.

At its maximum height of 62 feet in height to the top of the roof parapet, the proposed buildings would be similar to the height of nearby residential and commercial uses in the vicinity of the Project Site. Specifically, the Project would be similar in height to the four-story Villa Elaine mixed-use project located to the east of the Project Site, and the four-story residential uses located to the south of the Project Site located on N. Cahuenga Boulevard and at the corner of Lillian Way.

The Project is also not as tall as the five-story Hampton Inn Suites hotel located to the south east of the Project Site.

In addition, the proposed design would be compatible with the design elements of surrounding office buildings in the Hollywood area. Specifically, the Project would be compatible with the five-story Netflix building on Vine Street, located southeast of the Project Site, and the three-story BLT Studios and Soundstages on Vine Street, located southeast of the Project Site. In addition, farther northeast of the Project Site on Fountain Avenue is the three-story Pickford Center for Motion Picture Study and the Academy of Motion Picture Arts and Sciences Building which would also be compatible with the design elements of the Project Site.

Overall, while the Project would change the visual character of the Project Site, the height of the proposed buildings, design, massing, and scale would be compatible with the existing urban uses that set the aesthetic character of the vicinity. Based on the analysis above, the Project would not substantially degrade the existing visual character or quality of the Project Site or surrounding vicinity.

With regard to the City of Los Angeles's regulations governing scenic quality, local land use plans applicable to the Project Site also include policies governing scenic quality, including the Citywide General Plan Framework Element (Framework Element), the Hollywood Community Plan (1988), the Hollywood Redevelopment Plan, the Citywide Urban Design Guidelines, and the City of Los Angeles's Walkability Checklist.

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

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

Less Than Significant Impact.

Construction

Construction could include nighttime activities involving the use of on-site lighting during demolition, excavation, framing, and building construction. Lighting would include floodlights focused on the work area that would be shielded to focus the light on-site and preclude light trespass onto nearby properties. The principal effect of nighttime construction lighting would be to increase the overall ambient glow emanating from the Project Site. Per the requirements of the LAMC, construction hours would be limited to 7:00 AM to 9:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday. As such, Project construction lighting would not result in substantial changes to existing artificial light conditions or interfere with off-site activities. **Therefore, less than significant impacts would occur related to construction lighting.**

Operation

Light

The Project Site is located in a well-lit area of the City of Los Angeles where there are moderate to high levels of ambient nighttime lighting, including street lighting, vehicle headlights, architectural and security lighting, and indoor building illumination (light emanating from structures which passes through windows), all of which are common to densely populated areas. Cahuenga Boulevard is a major thoroughfare with four lanes of traffic and includes lighted streets along its length in this area. Lexington Avenue is a thoroughfare with two lanes and includes lighted streets along its length in this area.

The streets in these areas are lit using City of Los Angeles standard streetlights. Because the Project Site is located within an urban environment, light emanating from any one source contributes to the overall lighting effect rather than being solely responsible for lighting impacts on a particular use. As land uses surrounding the Project Site are already lit from existing development in the area, any additional amount of new light sources must be noticeably visible to light-sensitive uses to have any notable effect.

There are several sensitive use receptors near the Project Site that could be susceptible to light impacts created by the Project. Sensitive uses are defined by Los Angeles Municipal Code Chapter IX, Article 3, Section 93.0117 as any exterior glazed window or sliding glass door on any other property containing a residential unit or units, elevated habitable porch, deck, or balcony on any other property containing a residential unit or units, or any ground surface intended for uses such as recreation, barbecue, or lawn areas on any other property containing a residential unit or units. Office, warehouse, manufacturing, commercial, and institutional uses are not considered light sensitive uses because they are generally not in use during the evening hours, although many of these uses maintain interior, exterior, and/or landscape lighting during the late hours for maintenance and security purposes.

The light-sensitive uses in the vicinity include the one-story single family residential uses located across La Mirada Avenue, the three-story residential use located east and adjacent to the Project Site, the three-story residential use and two one-story residential uses located south of the Project Site across Lexington Avenue, and the two-story residential use and one-story residential use located west of the Project Site across Cahuenga Boulevard.

The Project would increase lighting effects compared to the existing uses on the Project Site. The Project is designed with windows and office lighting. The exterior lighting would include soffit downlights in the ground floor covered area, as well as low-level landscape lighting and limited façade up-lighting (including lighting of the feature exterior stair on the east-facing elevation) for safety, wayfinding and to highlight key architectural features.

The exterior lighting would include soffit downlights in the ground floor covered area, as well as low-level landscape lighting and limited façade up-lighting (including lighting of the feature exterior stair on the east-facing elevation) for pedestrian safety, wayfinding and to highlight key architectural features.

All exterior lighting would meet all applicable LAMC standards and be shielded or directed toward the areas to be illuminated. The exterior lighting would include soffit downlights in the ground floor covered area, as well as low-level landscape lighting and limited façade up-lighting (including lighting of the feature exterior stair on the east-facing elevation) for pedestrian safety, wayfinding and to highlight key architectural features. In compliance with all applicable LAMC standards, exterior lighting on the Project Site would not illuminate adjacent properties, unless otherwise required for other safety purposes as determined by the City of Los Angeles.

The Project would include the following type of signage: monument signs, wayfinding signs, projecting signs, wall signs, illuminated architectural canopy signs, pole signs, roof signs and window signs. Project signage would be illuminated by means of low-level external lighting, internal halo lighting, or ambient light. The Project would not include electronic signage or signs with flashing, mechanical, or strobe lights. In accordance with LAMC Section 14.4.4-E, illumination used for project signage would be limited to a light intensity of 3-foot candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

Therefore, while it is anticipated that the amount of light emanating from the Project would represent an increase over current light levels, with compliance with all applicable LAMC standards, exterior lighting on the Project Site would not illuminate adjacent properties, or create a substantial change in the lighting environment of the Project Site and surrounding area. As such, the Project would not result in substantial changes to existing artificial light conditions and would not interfere with off-site activities. **Therefore, the Project's potential light impacts would be less than significant.**

Glare

The Project would incorporate both solid and glass surfaces. The Project would be prohibited from the using highly reflective building materials such as mirrored glass on exterior façades. Examples of commonly used non-reflective building materials include cement, plaster, concrete, metal, and non-mirrored glass, and would likely include additional materials as technology advances in the future. As such, the Project would not glare effects in areas that are highly visible to off-site glare-sensitive uses. **Therefore, impacts related to daytime glare would be less than significant.**

II. AGRICULTURE AND FORESTRY RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

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

No Impact. A significant impact may occur if a project were to result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use. The Project Site is developed with the Stratford School Building, a recreational field, and a below-grade parking garage and is located in a developed area of the City of Los Angeles. According to the State Farmland Mapping and Monitoring Program's most recent Farmland mapping data for Los Angeles County, neither the Project Site nor the surrounding area are designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[6] **Thus,**

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

the Project would not result in the loss of State-designated Farmland. Therefore, no impacts would occur, and no mitigation measures are required.

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

No Impact. A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act contract from agricultural use to another non-agricultural use. The Project Site is zoned RD1.5-1XL and has a General Plan land use designation of Low Medium II Residential land uses. Thus, the Project Site is not zoned for agricultural use, nor are there any agricultural uses currently occurring at the Project Site or within the surrounding area. The Site is located within an Urban Agriculture Incentive Zone; however, the Project does not involve a contract to use vacant property for agricultural purposes in exchange for reduced property taxes. Additionally, according to the State's most recent Williamson Act land data, neither the Project Site nor surrounding area is under a Williamson Act contract. **Therefore, no impacts would occur, and no mitigation measures are required.**

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

No Impact. A significant impact may occur if a project results in the conversion of farmland to another, non-agricultural use, and/or if a project results in the conversion of forest land to another, non-forest use. There are no forest or timberland resources on this fully developed site that is in an urbanized part of the City of Los Angeles.

In the City of Los Angeles, forest land is a permitted use in areas zoned OS (Open Space); however, the City of Los Angeles does not have specific zoning for timberland or timberland production. The Project Site is zoned RD1.5-1XL and has a General Plan land use designation of Low Medium II Residential. The Project Site is not zoned for forest land, timberland, or timberland production land uses. **Therefore, no impacts would occur, and no mitigation measures are required.**

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

No Impact. A significant impact may occur if a project results in the conversion of forest land to another, non-forest use. The Project Site is developed with the Stratford School Building, a recreational field, and a below-grade parking garage and is located in a developed area of the City of Los Angeles. No forest land exists on or in the vicinity of the Project Site, and Project implementation would not result in the loss or conversion of forest land. **Therefore, no impacts would occur, and no mitigation measures are required.**

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

No Impact. A significant impact may occur if a project results in the conversion of farmland to another, non-agricultural use, and/or if a project results in the conversion of forest land to another, non-forest use. The Project Site is previously developed and located in an urbanized area of the

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

III. AIR QUALITY

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

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

The following analysis summarizes and incorporates by reference the information provided in the *1200 Cahuenga Project Air Quality, Greenhouse Gas, and Energy Study, City of Los Angeles, California* (Air Quality Study) prepared by MD Acoustics, Inc. dated November 29, 2022. The document is available as Appendix A to this IS/MND.

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

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

The agency for air pollution control for the South Coast Air Basin (SoCAB or Basin) is the South Coast Air Quality Management District (SCAQMD). The SCAQMD is responsible for controlling emissions primarily from stationary sources. The SCAQMD maintains air quality monitoring stations throughout the Basin. The SCAQMD, in coordination with the Southern California Association of Governments, is also responsible for developing, updating, and implementing the

AQMP for the Basin. An AQMP is a plan prepared and implemented by an air pollution district for a county or region designated as nonattainment of the federal and/or California ambient air quality standards.

On March 3, 2017, the SCAQMD adopted the 2016 AQMP. The 2016 AQMP addresses strategies and measures to attain the 2008 federal 8-hour ozone standard by 2032, the 2012 federal annual $PM_{2.5}$ standard by 2021 to 2025, and the 2006 federal 24-hour $PM_{2.5}$ standard by 2019. The 2016 AQMP also examined the regulatory requirements for attaining the 2015 federal 8-hour ozone standard. The 2016 AQMP also updates previous attainment plans for ozone and $PM_{2.5}$ that have not yet been met. In general, the AQMP is updated every 3 to 4 years. However, the air quality planning process for the AQMP is continuous and each iteration is an update of the previous plan. The 2016 AQMP is the current AQMP that is in place, however, the SCAQMD is currently in the process of developing the 2022 AQMP.

The Project Site is located within the City of Los Angeles, which is located within the South Coast Air Basin (SoCAB or Basin) that includes all of Orange County as well as the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The South Coast Air Basin is located on a coastal plain with connecting broad valleys and low hills to the east. Regionally, the South Coast Air Basin is bounded by the Pacific Ocean to the southwest and high mountains to the east forming the inland perimeter.

CEQA requires a discussion of any inconsistencies between a proposed project and applicable General Plans and Regional Plans (CEQA Guidelines Section 15125). The regional plan that applies to the proposed Project includes the applicable SCAQMD Air Quality Management Plan (AQMP). Therefore, this section discusses any potential inconsistencies of the proposed Project with the AQMP.

The assessment of the Project's consistency with the 2016 AQMP sets forth the issues regarding the Project's consistency with the assumptions and objectives of the 2016 AQMP and discusses whether the Project would interfere with the region's ability to comply with Federal and State air quality standards.

The SCAQMD CEQA Handbook states that "New or amended General Plan Elements (including land use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP." Strict consistency with all aspects of the plan is usually not required. A proposed project should be considered to be consistent with the AQMP if it furthers one or more policies and does not obstruct other policies. The SCAQMD CEQA Handbook identifies two key indicators of consistency:[7]

(1) Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

7 SCAQMD. CEQA Air Quality Handbook. November 1993. Print.

(2) Whether the project will exceed the assumptions in the AQMP or increments based on the year of project buildout and phase. According to Chapter 12 of the SCAQMD CEQA Air Quality Handbook, the purpose of the General Plan consistency findings is to determine whether a project is inconsistent with the growth assumptions incorporated into the air quality plan, and thus, whether it would interfere with the region's ability to comply with federal and California air quality standards.

Both of these indicators are evaluated below.

Increase in the Frequency or Severity of Violations?

Based on the air quality modeling analysis presented above, neither the Project's short-term construction activities, nor its long-term operations would result in significant impacts based on the SCAQMD regional and local thresholds of significance. As such, the Project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of air quality standards.

Exceed the Assumptions in the AQMP and thus Interfere with the Region's Ability to Comply with Air Quality Standards?

As discussed in the Population and Housing analysis for the Project, the Project would be consistent with the regional growth projections for the Los Angeles Subregion. As noted above in the Project Description, as a creative office project, the Project would not introduce new homes at the Project Site and would therefore not result in direct population growth in the area. Based on employee generation rates promulgated by the City of Los Angeles VMT Calculator Documentation and also provided in the Project's Transportation Assessment, the Project would generate approximately 300 employees (Overland Traffic Consultants, 2021). According to SCAG's 2016–2040 RTP/SCS, there were approximately 1,848,339 employees within the City of Los Angeles in 2021 and approximately 1,917,721 employees are projected within the City for 2023, the Project's buildout year, which would be an increase of 69,382 employees. As such, the Project's estimated 300 employees would represent 0.02 percent of the total number of employees in 2023 and 0.43 percent of the growth between 2021 and 2023 within the City of Los Angeles. While some of the new employment positions could be filled by persons who would relocate to the vicinity of the Project Site, this potential increase in population would not be substantial since not all employees would move close to the Project Site. Specifically, some employment opportunities may be filled by persons already residing in the vicinity of the Project Site and other persons would commute to the Project Site from other communities in and outside of the City. Therefore, the increase in employees would be well within the existing employment projections for the community and region. Because the Project would result in a minimal increase in permanent employment, it would be consistent with the demographic projections set forth in SCAG's 2016–2040 RTP/SCS that were used in the 2016 AQMP. Thus, the Project would not conflict with or obstruct implementation of the 2016 AQMP.

Additionally, the Project would be consistent with the vehicle miles travelled (VMT) reduction policies included in SCAG's 2016–2040 RTP/SCS. Specifically, consistent with the 2016–2040 RTP/SCS alignment of transportation, land use, and housing strategies, the Project would provide

employees and visitors with convenient access to public transit, which would facilitate a reduction in VMT. The Project's transportation demand management (TDM) plan and its less than significant VMT would be consistent with regional strategies and would be consistent with and support the goals and benefits of the SCAG RTP/SCS, which seeks improved "mobility and access by placing destinations closer together and decreasing the time and cost of traveling between them. Thus, consistent with 2016–2040 RTP/SCS, the Project would create less than significant VMT, and, consequently, the Project's mobile source emissions would be reduced.

Therefore, the Project would not exceed the assumptions in the 2016 AQMP and thus would not interfere with the region's ability to comply with air quality standards. As such, the Project would not be inconsistent with the SCAQMD 2016 AQMP.

In addition, the Project would not conflict with or obstruct implementation of the City's General Plan Air Quality Element.[8] The City's General Plan Air Quality Element identifies policies and strategies for advancing the City's clean air goals. To achieve the goals of the Air Quality Element, performance-based standards have been adopted by the City of Los Angeles to provide flexibility in implementation of its policies and objectives. The goal, objectives, and policies provided in the City's Air Quality Element applicable to the Project include the following.

- **Goal 1:** Good air quality and mobility in an environment of continued population growth and healthy economic structure.
- **Objective 1.1:** It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.
- **Objective 1.3:** It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.
- **Policy 1.3.2:** Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.
- **Policy 4.2.3:** Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles

The Project's location within an existing developed urban area would reduce VMT and related vehicle emissions in comparison to a project located in a non-urban environment. The Project Site is also located in Hollywood, with its growth in mixed-use residential and commercial development. High population density would result in employees and visitors potentially living closer to the Project Site, reducing travel distances and overall VMT. In addition, the Project includes short- and long-term bicycle parking spaces, shower/changing facilities, pedestrian-friendly features and on-site EV and EV-ready parking, and the Project Site provides convenient access to public transit, all of which encourages multi-modal transportation and facilitates a

8 Department of City Planning Los Angeles, General Plan Air Quality Element, November 1992, https://planning.lacity.org/odocument/0ff9a9b0-0adf-49b4-8e07-0c16feea70bc/Air_Quality_Element.pdf.

reduced use of vehicular use and a reduction in VMT as discussed in the Transportation Assessment.

As shown in Tables 9 through 12 of Appendix A of this IS/MND, Project implementation would not exceed the SCAQMD localized significance thresholds which were developed to ensure no exceedances of the California or federal ambient air quality standards or thresholds. As the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for air quality pollutants (including VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$), the Project also would not delay timely attainment of air quality standards or interim emission reductions specified in the 2016 AQMP. In addition, the Project would be consistent with the population and employment growth projections in the AQMP.

Based on the above, the Project would not conflict with or obstruct implementation of the SCAQMD's AQMP or the City's General Plan Air Quality Element. **Therefore, a less than significant impact would occur and no mitigation measures are required.**

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

Less Than Significant Impact. A significant impact could occur if the project were to add a considerable cumulative contribution to federal or State non-attainment pollutants.

The Project has been evaluated to determine if it would violate an air quality standard or contribute to an existing or projected air quality violation. Additionally, the Project has been evaluated to determine if it would result in a cumulatively considerable net increase of a criteria pollutant for which the South Coast Air Basin (SCAB) is non-attainment under an applicable federal or state ambient air quality standard.

The City has determined to adopt the checklist questions set forth in Appendix G of the CEQA Guidelines as thresholds for assessing the significance of a project's potential impacts related to air quality. A significant impact would occur if the project would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard;
- Expose sensitive receptors to substantial pollutant concentrations; or
- Result in other emissions (such as those leading to odors adversely affecting a substantial number of people).

There are daily emission thresholds for construction and operation of a proposed project in the basin.

Regional Significance Thresholds for Construction Emissions

The following CEQA significance thresholds for construction emissions are established for the Basin:

- 75 pounds per day (lbs/day) of ROC
- 100 lbs/day of NO_x
- 550 lbs/day of CO
- 150 lbs/day of PM_{10}
- 55 lbs/day of $PM_{2.5}$
- 150 lbs/day of SO_2

Projects in the basin with construction-related emissions that exceed any of the emission thresholds are considered to be significant under SCAQMD guidelines.

Regional Significance Thresholds for Operational Emissions

The daily operational emissions significance thresholds for the basin are as follows:

- 55 pounds per day (lbs/day) of ROC
- 55 lbs/day of NO_X
- 550 lbs/day of CO
- 150 lbs/day of PM_{10}
- 55 lbs/day of $PM_{2.5}$
- 150 libs/day of SO_2

Thresholds for Localized Significance

The maximum number of acres disturbed in a day would be 2 acres as shown in Table 4.1, *Construction Equipment Assumptions*. The nearest existing sensitive receptor are the residences adjacent to the east, approximately 10 feet. According to LST methodology any receptor located closer than 25 meters should be based on the 25-meter threshold. Therefore, the localized threshold for 2 acres of disturbance per day and a 25-meter distance in Central LA has been used for this analysis.

Table 4.1
Construction Equipment Assumptions[1]

Activity	Equipment	Number	Acres/8hr-day	Total Acres
Demolition	Rubber Tired Dozers	1	0.5	0.5
	Tractors/Loaders/Backhoes	3	0.5	1.5
Total Per Phase				*2.0*
Grading	Graders	1	0.5	0.5
	Rubber Tired Dozers	1	0.5	0.5
	Tractors/Loaders/Backhoes	2	0.5	1.0
Total Per Phase				*2.0*

Notes:

[1.] Source: Source: South Coast AQMD, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. *http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf?sfvrsn=2*
Source: MD Acoustics, 2022.

California Emissions Estimator Model

Emissions are estimated using the California Emissions Estimator Model (CalEEMod) (Version 2020.4.0) software, which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Regional data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The model is an accurate and comprehensive tool for quantifying air quality impacts from land use projects throughout California and is recommended by the SCAQMD.[9] The latest version of CalEEMod was used to estimate the on-site and off-site construction emissions. The emissions estimates incorporate SCAQMD Rule 402 and 403. Measures incorporated into the Project to reflect compliance with Rules 402 and 403 (fugitive dust) are not considered mitigation measures as the Project is required to incorporate these rules during construction.

Modeling Assumptions

Construction

Typical emission rates from construction activities were obtained from CalEEMod Version 2020.4.0. CalEEMod is a computer model published by the SCAQMD for estimating air pollutant emissions. Using CalEEMod, the peak daily air pollutant emissions were calculated and presented below. These emissions represent the highest level of emissions for each of the construction phases in terms of air pollutant emissions.

The analysis assesses the emissions associated with the construction of 55,814 square feet of new buildings and associated hardscape and parking lot. Construction was estimated to begin approximately September 2022 and end approximately April 2024. The phases of the construction activities analyzed below are: 1) demolition of 8,941 square feet of buildings and facilities, 2) grading (12,678 CY of export of material), 3) paving, 4) building construction, and 5) architectural coating. The building phase was condensed from CalEEMod default length to accommodate the construction timing per the Project applicant. Default CalEEMod equipment counts and daily equipment usage hours were used for this analysis. For details on construction modeling, please see Appendix A. Table 4.2, *Construction Equipment* shows the full list of construction equipment per CalEEMod.

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

Table 4.2
Construction Equipment

Phase	Offroad Equipment Type	Amount	Daily Usage Hours
Demolition	Concrete/Industrial Saws	1	8
	Rubber Tired Dozers	1	8
	Tractors/Loaders/Backhoes	3	8
Grading	Graders	1	8
	Rubber Tired Dozers	1	8
	Tractors/Loaders/Backhoes	2	7
Building Construction	Cranes	1	6
	Forklifts	1	6
	Generator Sets	1	8
	Tractors/Loaders/Backhoes	3	6
	Welders	1	8
Paving	Cement and Mortar Mixers	1	6
	Pavers	1	6
	Paving Equipment	1	8
	Rollers	1	7
	Tractors/Loaders/Backhoes	1	8
Architectural Coating	Air Compressors	1	6

Source MD. Acoustics 2022.

Operations

Operational or long-term emissions occur over the life of the Project. Both mobile and area sources generate operational emissions. Area source emissions arise from consumer product usage, heaters that consume natural gas, gasoline-powered landscape equipment, and architectural coatings (painting). Mobile source emissions from motor vehicles are the largest single long-term source of air pollutants from the operation of the Project. Small amounts of emissions would also occur from area sources such as the consumption of natural gas for heating, from landscaping emissions, and consumer product usage. The operational emissions were estimated using the latest version of CalEEMod.

Mobile Sources

Mobile sources include emissions from the additional vehicle miles generated from the proposed Project. CalEEMod default values were used to estimate mobile-source emissions. Please see CalEEMod output comments sections in Appendix A for details.

Area Sources

Area sources include emissions from consumer products, landscape equipment and architectural coatings. Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, rototillers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers, as well as air compressors, generators, and pumps. As specifics were not known about the

landscaping equipment fleet, CalEEMod defaults were used to estimate emissions from landscaping equipment.

Energy Usage

2020.4.0 CalEEMod defaults were utilized.

Localized Construction Analysis

The SCAQMD has published a "Fact Sheet for Applying CalEEMod to Localized Significance Thresholds" (South Coast Air Quality Management District 2011b). CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily disturbance activity possible for each piece of equipment. In order to compare CalEEMod reported emissions against the localized significance threshold lookup tables, the CEQA document should disclose the following parameters:

1) The off-road equipment list (including type of equipment, horsepower, and hours of operation) assumed for the day of construction activity with maximum emissions.

2) The maximum number of acres disturbed on the peak day.

3) Any emission control devices added onto off-road equipment.

4) Specific dust suppression techniques used on the day of construction activity with maximum emissions.

As shown in Table 4.2, the maximum number of acres disturbed in a day would be up to 2 acres; therefore, the data for a 2-acre site was used.

The local air quality emissions from construction were analyzed using the SCAQMD's Mass Rate Localized Significant Threshold Look-up Tables and the methodology described in Localized Significance Threshold Methodology, prepared by SCAQMD, revised July 2008. The Look-up Tables were developed by the SCAQMD in order to readily determine if the daily emissions of CO, NO_X, PM_{10}, and $PM_{2.5}$ from the proposed Project could result in a significant impact to the local air quality. The emission thresholds were calculated based on the Central Los Angeles source receptor area (SRA 1) and a disturbance of 2 acres per day at a distance of 25 meters (82 feet). The distance to the nearest sensitive receptor is approximately 10 feet; however, according to LST methodology, any receptor closer than 25 meters should be based on the 25 meter threshold.

Localized Operational Analysis

For operational emissions, the screening tables for a disturbance area of 2 acre and a distance of 25 meters were used to determine significance. The tables were compared to the Project's operational emissions.

Regional Construction Emissions

Construction of the Project would have the potential to create regional air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities).[10] In addition, fugitive dust emissions would result from site preparation, grading and construction activities. Mobile source emissions, primarily particulate matter and nitrogen oxides (NO_X), would result from the use of off-road construction equipment such as loaders, graders, backhoes, haul and materials trucks and employee vehicles. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release volatile organic compounds (VOCs). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

The construction criteria pollutant emissions for the Project would not exceed the SCAQMD's daily emission thresholds at the regional level as reported in Table 4.3*, Regional Significance – Construction Emissions (pounds/day)*, and therefore would be considered less than significant and no mitigation measures are required.

Localized Construction Emissions

The data provided in Table 4.4*, Localized Significance – Construction* shows that none of the analyzed criteria pollutants would exceed the local emissions thresholds at the nearest sensitive receptors. Therefore, a less than significant local air quality impact would result from construction of the proposed Project and no mitigation measures are required.

Regional Operational Emissions

The operations-related criteria pollutant emission impacts created by the proposed Project have been analyzed using the CalEEMod model. The operating emissions were based on year 2024, which is the anticipated opening year for the Project. The summer and winter emissions created by the proposed Project's long-term operations were calculated and are summarized in Table 4.5*, Regional Significance – Operational Emissions (lbs/Day)* using the maximum value from either summer or winter. Based on trip generation factors, long-term operational emissions associated with the proposed Project, calculated with the CalEEMod model, are shown in Table 4.5.

10 Construction assumptions are contained in Appendix A of this IS/MND. Construction emissions conservatively do not account for the offsetting emissions from decommissioning of existing operational uses during construction. All construction emissions are considered new emissions.

Table 4.3:
Regional Significance – Construction Emissions (pounds/day)

	Pollutant Emissions (pounds/day)					
Activity	**VOC**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Demolition						
On-Site[2]	1.69	16.62	13.93	0.02	1.35	0.86
Off-Site[3]	0.07	1.09	0.75	0.01	0.26	0.08
Total	**1.76**	**17.71**	**14.68**	**0.03**	**1.61**	**0.94**
Grading						
On-Site[2]	1.54	16.98	9.22	0.02	3.55	2.03
Off-Site[3]	1.09	39.60	9.38	0.14	4.36	1.39
Total	**2.63**	**56.58**	**18.61**	**0.16**	**7.91**	**3.41**
Building Construction						
On-Site[2]	1.65	12.50	12.73	0.02	0.59	0.57
Off-Site[3]	0.19	1.09	2.05	0.01	0.63	0.18
Total	**1.84**	**13.60**	**14.78**	**0.03**	**1.21**	**0.75**
Paving						
On-Site[2]	0.62	5.86	8.83	0.01	0.28	0.26
Off-Site[3]	0.04	0.03	0.44	0.00	0.15	0.04
Total	**0.66**	**5.89**	**9.26**	**0.01**	**0.43**	**0.30**
Architectural Coating						
On-Site	31.64	1.22	1.81	0.00	0.06	0.06
Off-Site	0.03	0.02	0.30	0.00	0.10	0.03
Total	**31.66**	**1.24**	**2.11**	**0.00**	**0.16**	**0.09**
Total Construction Duration						
Maximum Daily	**38.55**	**95.02**	**59.44**	**0.24**	**11.32**	**5.48**
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Thresholds	No	No	No	No	No	No

Notes:
[1] Source: CalEEMod Version 2020.4.0.
[2] On-site emissions from equipment operated on-site that is not operated on public roads.
[3] Off-site emissions from equipment and vehicles operated on public roads.
Source: MD Acoustics, 2022.

Table 4.4:
Localized Significance – Construction

Phase	On-Site Pollutant Emissions (pounds/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Demolition	16.62	13.93	1.35	0.86
Grading	16.98	9.22	3.55	2.03
Paving	12.50	12.73	0.59	0.57
Building Construction	5.86	8.83	0.28	0.26
Architectural Coating	1.22	1.81	0.06	0.06
Total Construction Duration				
Maximum Daily	53.19	46.51	5.83	3.77
SCAQMD Construction Threshold for 25 meters (82 feet)[2]	**108**	**1,048**	**8**	**5**
Exceeds Threshold?	**No**	**No**	**No**	**No**

Notes:
[1] Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for 2-acre in Central LA.
[2] The estimated distance from the Project Site to the nearest existing multi-family building located 10 feet east of the Project Site, however according to LST methodology any receptor located closer than 25 meters should be based on the 25-meter threshold.
Source: MD Acoustics, 2022.

Table 4.5
Regional Significance – Operational Emissions (lbs/Day)

Activity	Pollutant Emissions (pounds/day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Area Sources[2]	1.28	0.00	0.02	0.00	0.00	0.00
Energy Usage[3]	0.02	0.15	0.13	0.00	0.01	0.01
Mobile Sources[4]	1.01	1.09	10.12	0.02	2.35	0.64
Total Emissions	**2.30**	**1.24**	**10.27**	**0.02**	**2.36**	**0.65**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?	No	No	No	No	No	No

Notes:
[1] Source: CalEEMod Version 2020.4.0
[2] Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.
[3] Energy usage consists of emissions from generation of electricity and on-site natural gas usage.
[4] Mobile sources consist of emissions from vehicles and road dust.
Source: MD Acoustics, 2022.

Table 4.5 provides the Project's operational emissions. Table 4.5 shows that the Project's criteria pollutant emissions would not exceed the corresponding SCAQMD daily emission thresholds. The operational impacts would be less than significant.

Localized Operational Emissions

Table 4.6*, Localized Significance – Operational Emissions* shows the calculated localized emissions for the proposed operational activities compared with appropriate LSTs. The LST analysis only includes on-site sources; however, the CalEEMod software outputs do not separate

on-site and off-site emissions for mobile sources. For a worst-case scenario assessment, the emissions shown in Table 4.6 include Project-related mobile sources that were estimated at one tenth of the gross vehicular emissions and road dust. This trip length represents an estimate of the amount of Project-related new vehicle traffic that would occur on-site.[11]

Table 4.6 demonstrates that the operational emission rates would not exceed the LST thresholds for the nearest sensitive receptors at 25 meters or less. Therefore, the Project would not result in significant localized operational emissions.

Operation of the Project would not introduce any major new sources of air pollution within the Project Site. Project-related air pollutant emissions would occur from on-site sources such as architectural coatings, landscaping equipment, and on-site usage of natural gas, as well as the operation of vehicles on-site.

Table 4.6
Localized Significance – Operational Emissions

LST Pollutants[1]	NO_X	CO	PM_{10}	$PM_{2.5}$
	(lbs/day)	(lbs/day)	(lbs/day)	(lbs/day)
Area Sources[2]	0.00	0.02	0.00	0.00
Energy Usage[3]	0.15	0.13	0.01	0.01
Vehicle Emissions[4]	0.11	1.01	0.23	0.06
Total Emissions	**0.26**	**1.16**	**0.25**	**0.08**
SCAQMD Operational Threshold for 25 meters (82 feet)	**108**	**1,048**	**2**	**2**
Exceeds Threshold?	**No**	**No**	**No**	**No**

Notes:
[1] Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for 2-acre in Central LA.
[2] Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.
[3] Energy usage consists of emissions from on-site natural gas usage.
[4] On-site vehicular emissions based on 1/10 of the gross vehicular emissions and road dust.
[5] The estimated distance from the Project Site to the nearest existing multi-family building located 10 feet east of the Project Site, however according to LST methodology any receptor located closer than 25 meters should be based on the 25-meter threshold.
Source: MD Acoustics, 2022.

Because the Project's operational emissions would be less than significant, the Project's contribution to cumulative regional emissions would not be cumulatively considerable. Thus, the Project's impacts would be less than significant, and no mitigation measures are required.

c. Expose sensitive receptors to substantial pollutant concentrations?

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

11 The Project Site is approximately 0.06 miles in length at its longest point; therefore the on-site mobile source emissions represent approximately 1/115th of the shortest CalEEMod default distance of 6.9 miles. Therefore, to be conservative, 1/10th the distance (dividing the mobile source emissions by 10) was used to represent the portion of the overall mobile source emissions that would occur on-site.

The Project Site is bordered by commercial uses to the west, by La Mirada Avenue and single-family residences to the north, by multi-family units and commercial uses and ultimately Vine Street to the east, by Lexington Avenue and multi-family residences and commercial uses to the south, and by North Cahuenga Boulevard and commercial uses to the east. Therefore, air quality-sensitive uses border the Project Site on its north, east and south sides.

Localized Construction Emissions

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

The data provided in Table 4.4*, Localized Significance – Construction* above, shows that none of the analyzed criteria pollutants would exceed the local emissions thresholds at the nearest sensitive receptors. Therefore, a less than significant local air quality impact would result from construction of the proposed Project and no mitigation measures are required.

Localized Operational Emissions

Table 4.6, Localized Significance – Operational Emissions above, shows the calculated localized emissions for the proposed operational activities compared with appropriate LSTs. The LST analysis only includes on-site sources; however, the CalEEMod software outputs do not separate on-site and off-site emissions for mobile sources. For a worst-case scenario assessment, the emissions shown in Table 4.6 include Project-related mobile sources that were estimated at one tenth of the gross vehicular emissions and road dust. This trip length represents an estimate of the amount of Project-related new vehicle traffic that would occur on-site.[12]

Table 4.6 demonstrates that the operational emission rates would not exceed the LST thresholds for the nearest sensitive receptors at 25 meters or less**.** Therefore, the Project would not result in significant localized operational emissions.

Operation of the Project would not introduce any major new sources of air pollution within the Project Site. Project-related air pollutant emissions would occur from on-site sources such as architectural coatings, landscaping equipment, and on-site usage of natural gas, as well as the operation of vehicles on-site.

Construction-Related Toxic Air Contaminants

The greatest potential for toxic air contaminant emissions would be related to diesel particulate emissions associated with heavy equipment operations during construction of the proposed Project. According to SCAQMD methodology, health effects from carcinogenic air toxics are

[12] The Project Site is approximately 0.06 miles in length at its longest point; therefore the on-site mobile source emissions represent approximately 1/115th of the shortest CalEEMod default distance of 6.9 miles. Therefore, to be conservative, 1/10th the distance (dividing the mobile source emissions by 10) was used to represent the portion of the overall mobile source emissions that would occur on-site.

described in terms of "individual cancer risk". "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Given the temporary and short-term construction schedule (approximately 18 months), the proposed Project would not result in a long-term (i.e., 70 years) substantial source of toxic air contaminant emissions and would not create a long-term (i.e., lifetime or 70-year) exposure to toxic air contaminant emissions and corresponding individual cancer risk. Therefore, no significant short-term toxic air contaminant impacts would occur during construction of the proposed Project.

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

CO Hot Spots Analysis

With regard to off-site localized impacts, land use development projects may increase traffic in the nearby vicinity resulting in an increase in mobile source emissions. CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future without and with Project CO levels to the State and federal CO standards which were presented above.

The SCAQMD recommends that a local CO hot spot analysis be conducted if the intersection meets one of the following criteria: 1) the intersection is at level of service (LOS) D or worse and where the project increases the volume to capacity ratio by 2 percent, or 2) the project decrease at an intersection from C to D.

Micro-scale air quality emissions have traditionally been analyzed in environmental documents where the air basin was a non-attainment area for CO. However, the SCAQMD has demonstrated in the CO attainment redesignation request to EPA that there are no "hot spots" anywhere in the Basin. If the worst-case intersections in the air basin have no "hot spot" potential, any local impacts will be below thresholds.

The analysis prepared for CO attainment in the Basin by the SCAQMD was used to assist in evaluating the potential for the Project to create CO exceedances in the Air Basin. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 Air Quality Management Plan (2003 AQMP) and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan). [13,14]

As discussed in the 1992 CO Plan, peak carbon monoxide concentrations in the Air Basin are due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. Considering the region's unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of the 1992 CO Plan and subsequent plan updates and air quality management plans.

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

In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which had a daily traffic volume of approximately 100,000 vehicles per day. As part of the 2003 AQMP CO Modeling Attainment Demonstration, an updated analysis was performed based on the 1992 CO Plan using more recent modeling techniques (dispersion modeling, emission factors).[15] The 2003 AQMP CO Modeling and Attainment Demonstration estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day. As an initial screening step, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis.

According to the Project's Revised Transportation Assessment (Overland 2021), the volume of traffic at Project buildout with cumulative projects would be well below 100,000 vehicles, which is below the volume that would trigger even the preparation of a detailed CO hot spot analysis.

Operations-Related Toxic Air Contaminants

When considering potential operational air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit toxic air contaminants. The California Air Resources Board (CARB) has published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective (2005), which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities).[16] SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning (2005).[17] Together, the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses.

The Project would not include any substantial sources of toxic air contaminant emissions such as generators, boilers or any other combustion sources. Moreover, if the Project were to install stationary equipment with the potential to emit toxic air contaminants, this equipment would be subject to SCAQMD permitting requirements which will identify health risk to nearby sensitive receptors. As the Project would not contain substantial sources of toxic air contaminant emissions and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the

15 SCAQMD, Air Quality Management Plan, Appendix V, Modeling and Attainment Demonstrations, August 2003.

16 California Air Resources Board, Air Quality and Land Use Handbook: A Community Health Perspective, April 2005, ww3.arb.ca.gov/ch/handbook.pdf.

17 SCAQMD, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 2005, www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf.

exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential toxic air contaminant impacts would be less than significant.

The SCAQMD recommends Health Risk Assessments (HRAs) for substantial sources of diesel particulate matter such as warehouse distribution and cold storage facilities. No such uses are proposed by the Project. As such, an HRA was not required for the Project.

Therefore, no significant long-term air quality impact is anticipated to local air quality with the on-going use of the proposed Project and no mitigation measures are required.

As discussed above, the Project would not exceed any of thresholds of significance recommended by the SCAQMD; therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant and no mitigation measures would be required.

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

Less Than Significant Impact. A significant impact could occur if a project were to create objectionable odors which could adversely impact sensitive receptors. Odors are typically associated with the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes.

According to the SCAQMD *CEQA Air Quality Handbook*, an odor impact would occur if the proposed project were to create an odor nuisance pursuant to SCAQMD Rule 402, which states:

> 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 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.
>
> The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

Land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The Project involves the construction and operation of creative office and retail uses; which are not typically associated with odor complaints.

Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement. The objectionable odors that may be produced during the construction process are of short-term in nature and the odor emissions are expected cease upon the drying or hardening of the odor producing materials. Due to the short-term nature and limited amounts of odor producing materials being utilized, no significant impact related to odors would occur during construction of the proposed Project.

As the Project involves no operational elements related to industrial projects, no long-term operational objectionable odors are anticipated. Trash receptacles for the Project would be covered, and odors from trash would be contained within the trash area. **Therefore, as the Project is required to comply with SCAQMD Rule 402, the Project would not create objectionable odors affecting a substantial number of people. Potential impacts associated with objectionable odors would be less than significant and no mitigation is required.**

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒

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

The following analysis is based on the Tree Report prepared by Paul Lewis Landscape Architect, dated September 27, 2021. All specific information on trees in the discussion below is from this report unless otherwise noted. The Tree Report is included as Appendix B of this IS/MND.

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. A significant impact may occur if a project were to remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the State or federal regulatory agencies cited. The Project Site is developed with the Stratford School Building, a recreational field, and a below-grade parking garage and is located in a developed area of the City of Los Angeles. The Project Site and immediately surrounding area are not within or near a designated Significant Ecological Area.[18] The Project Site does not contain any habitat capable of sustaining any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). Additionally, there are no known locally designated natural communities at the Project Site or in the immediate vicinity, nor is the Project Site located immediately adjacent to undeveloped natural open space or a natural water source that may otherwise serve as habitat for state- or federally listed species. **Therefore, no impacts would occur, and no mitigation measures are required.**

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

No Impact. A significant impact may occur if riparian habitat or any other sensitive natural community identified locally, regionally, or by the State and federal regulatory agencies cited were to be adversely modified without adequate mitigation. The Project Site is developed with the Stratford School Building, a recreational field, and a below-grade parking garage and is located in a developed area of the City of Los Angeles. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site. As discussed above, neither the Project Site nor adjacent areas are within a biological resource area or Significant Ecological Area. Implementation of the Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities. **Therefore, no impacts would occur, and no mitigation measures are required.**

18 Los Angeles County Department of Regional Planning, Planning & Zoning Information, GIS-NET3 online database, accessed August 2021.

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

No Impact. A significant impact may occur if state or federally protected wetlands are modified or removed without adequate mitigation. The Project Site is developed with the Stratford School Building, a recreational field, and a below-grade parking garage and is located in a developed area of the City of Los Angeles. Review of the National Wetlands Inventory identified no protected wetlands in the vicinity of the Project Site.[19] Furthermore, the Project Site is fully developed and does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act. As discussed above, neither the Project Site nor adjacent areas are within a biological resource area or Significant Ecological Area; thus, implementation of the Project would not result in any adverse impacts to state or federally protected wetlands such as marshes vernal pools, or coastal areas. **Therefore, no impacts would occur, and no mitigation measures are required.**

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

No Impact. A significant impact may occur if a project would interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites. The Project Site is developed with the Stratford School Building, a recreational field, and a below-grade parking garage and is located in a developed area of the City of Los Angeles.

Currently, the Project Site contains vegetation landscaping and 14 existing trees (6 street trees and 8 trees located on-site, 0 protected trees). There are 6 street trees; 3 on Lexington Avenue: 1 Mexican Fan Palm / Washingtonia Robusta, 1 Cherry Plum / Prunus Cerasifera, and 1 Natchez Crape Myrtle / Lagerstroemia Indica; and 3 street trees on N. Cahuenga Boulevard: 1 Purple Orchid Tree / Bauhinia Blakeana, and 2 Pink Trumpet Tree / Handroanthus Heptaphyllu. There are 8 existing trees on-site, 2 Italian Cypress/ Cupressus Sempervirens, 1 Purple Coraltree/Erthrina Fusca, and 1 Palo Verde /Parkinsonia Desert, 1 Coast Redwood / Sequoia Sempervirens, and 3 Sweet Gum / Liquidambar Styraciflua. The Project would require the removal of 8 existing trees on-site but all 6 existing street trees would remain in place. There are no protected species or heritage trees on the Project Site or in the adjacent public right-of-way.

‘’Pursuant to the Los Angeles Municipal Code (LAMC), the existing trees would be replaced at a ratio of 2:1 with a minimum 24” box replacement tree (16 trees). In addition, one tree per 500 square feet of landscaped area (22 trees per 11,419 square foot landscaped area); and three trees per 10,000 square feet of developed area (5 trees per 53,557 square foot developed area).

LAMC Landscape Ordinance 12.42 C 1.(a) states “at Least one tree, which shall not be a palm, shall be provided in the Project for each 500 square feet of landscaped area in the Project.” City of Los Angeles Ordinance 2019-0004 §1, 2019, Section 22.126.030.A 1.(c), under Amount of Trees, states “for projects that are non-residential or mixed-use, a minimum of three trees shall

19 U.S. Fish and Wildlife Service, National Wetlands Inventory, Wetlands Mapper, accessed August 2021.

be planted for every 10,000 square feet of developed lot area." Thus, a total of 30 trees would be provided as part of the Project. (17 Olea Europaea 'New Wilsonii' / Fruitless Olive, 5 Lagerstroemia X 'Natchez' / Natchez Crape Myrtle, 2 Ligustrum Lucidum / Glossy Privet, and 6 Melaleuca Quinuenervia / Broad-Leaved Paperbark). The Project would also provide 11,419 square feet of landscaping, as shown in Figure 3.18, *Landscaping Ground Level Plan*. Landscaping would be added to the courtyard, terraces, and decks.

Because the Project does not propose any residential uses, no LAMC code required open space, or recreational space is required. Notwithstanding, the Project would provide 14,667 square feet of non-required open space for tenants as part of its design, intended to promote worker well-being and enjoyment and attract/retain media-focused tenants in Hollywood. This open space would include the courtyard, terraces, and the decks.

The Project Site is not part of a wildlife corridor. Additionally, there are no waterways located in the vicinity of the Project Site that are used by migratory fish, and there are no wildlife nursery sites in the area. The Project would be required to comply with the Migratory Bird Treaty Act (MBTA), to reduce potential impacts to migratory bird species that could potentially nest in trees that would be removed as part of the Project. Thus, the Project would not interfere substantially with the movement of any native resident or migratory fish, wildlife species, or with established native resident or migratory wildlife corridors, and/or impede the use of native wildlife nursery sites. **Therefore, no impacts would occur, and no mitigation measures are required.**

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

No Impact. A project-related significant adverse effect could occur if a project is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance No. 177,404. As set forth in Ordinance No. 177,404, any of the following Southern California native tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, is a protected tree:

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

As discussed in the Tree Report in Appendix B, the Project Site also contains 14 non-protected trees (six street trees and eight trees located on-site). There are 6 street trees; 3 on Lexington Avenue: 1 Mexican Fan Palm / Washingtonia Robusta, 1 Cherry Plum / Prunus Cerasifera, and 1 Natchez Crape Myrtle / Lagerstroemia Indica; and 3 street trees on N. Cahuenga Boulevard: 1 Purple Orchid Tree / Bauhinia Blakeana, and 2 Pink Trumpet Tree / Handroanthus Heptaphyllu. There are 8 existing trees on-site, 2 Italian Cypress/ Cupressus Sempervirens, 1 Purple

Coraltree/Erthrina Fusca, and 1 Palo Verde /Parkinsonia Desert, 1 Coast Redwood / Sequoia Sempervirens, and 3 Sweet Gum / Liquidambar Styraciflua. The Project would require the removal of 8 existing trees on-site but all 6 existing street trees would remain in place. There are no protected species or heritage trees on the Project Site or in the adjacent public right-of-way.

Any street trees that would be removed through the development of the proposed Project would be required to comply with the City of Los Angeles's tree removal procedures, and replacement trees would be required to be provided in conformance with the City of Los Angeles's current guidelines and policies. There are no protected species or heritage trees.

However, as explained in the Project Description, above, there are no proposed right-of-way improvement other than what is required by the City of Los Angeles. In addition, no street trees would be removed without prior approval of Urban Forestry based on compliance with LAMC Sections 62.169 and 62.170 and applicable findings. At the time of preparation of this document, no approvals have been given for any tree removals on-site or in the right-of-way by BPW. A Tree Report has been prepared (see Appendix B) to identify all trees on the Project Site and in the right-of-way. No protected trees would be removed (# of protected trees on-site proposed for removal) and no (total # of street trees in the public right-of-way in front of the property, regardless of what is being proposed for removal) street trees would be removed as described above.

Pursuant to the Los Angeles Municipal Code (LAMC), the existing trees would be replaced at a ratio of 2:1 with a minimum 24" box replacement tree (10 trees). In addition, one tree per 500 square feet of landscaped area (22 trees per 11,419 square foot landscaped area); and three trees per 10,000 square feet of developed area (15 trees per 53,557 square foot developed area).

The Project Site does not contain locally protected biological resources, such as oak trees, Southern California black walnut, western sycamore, and California bay trees. Additionally, there is limited vegetation landscaping on and adjacent to the Project Site. Construction of the Project would not affect any protected trees. **Therefore, no impacts would occur, and no mitigation measures are required.**

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

No Impact. A significant impact may occur if a project is inconsistent with resource policies of any conservation plans of the types cited above. The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.[20] **Therefore, no impacts would occur, and no mitigation measures are required.**

20 California Department of Fish and Wildlife, California State Wildlife Action Plan, September 2015.

V. CULTURAL RESOURCES

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

The following section summarizes and incorporates by reference the information provided in the *Historical Resources Technical Report for 1200 Cahuenga Boulevard, Los Angeles*, (Historic Report) prepared by Historic Resources Group, November 21, 2022. The Historic Report is provided in its entirety in Appendix C of this IS/MND.

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

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

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

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

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

The fact that a resource is not listed in, or determined to be eligible for listing in the California Register, not included in a local register of historical resources (pursuant to §5020.1(k) of the Public Resources Code), or identified in an historical survey (meeting the criteria in §5024.1(g) of

the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code §§5020.1 (j) or 5024.1.

Regulatory Setting

National Register of Historic Resources

The National Historic Preservation Act of 1966 established the National Register of Historic Places (National Register) as "an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation's historic resources and to indicate what properties should be considered for protection from destruction or impairment."[21] The National Register recognizes a broad range of historical and cultural resources that are significant at the national, state, and local levels and can include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes. Within the National Register, approximately 2,500 (3 percent) of the more than 90,000 districts, buildings, structures, objects, and sites are recognized as National Historic Landmarks or National Historic Landmark Districts as possessing exceptional national significance in American history and culture.[22]

Whereas individual historic properties derive their significance from one or more of the criteria discussed in the subsequent section, a historic district derives its importance from being a unified entity, even though it is often composed of a variety of resources. With a historic district, the historic resource is the district itself. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties.[23] A district is defined as a geographic area of land containing a significant concentration of buildings, sites, structures, or objects united by historic events, architecture, aesthetic, character, and/or physical development. A district's significance and historic integrity determine its boundaries.

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

Criteria

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

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

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

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

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

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

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

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

Context

To be eligible for listing in the National Register, a property must be significant within a historic context. National Register Bulletin #15 states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are "those patterns, themes, or trends in history by which a specific property or site is understood and its meaning. is made clear."[24] A property must represent an important aspect of the area's history or prehistory and possess the requisite integrity to qualify for the National Register.

Integrity

In addition to meeting one or more of the criteria of significance, a property must have integrity, which is defined as "the ability of a property to convey its significance."[25] The National Register recognizes seven qualities that, in various combinations, define integrity. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance. In general, the National Register has a higher integrity threshold than State or local registers.

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

- Location is the place where the historic property was constructed or the place where the historic event took place.
- Design is the combination of elements that create the form, plan, space, structure, and style of a property.
- Setting is the physical environment of a historic property.

24 National Register Bulletin #15, 7-8.

25 National Register Bulletin #15, 44.

- Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.

- Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.

- Feeling is a property's expression of the aesthetic or historic sense of a particular period of time.

- Association is the direct link between an important historic event or person and a historic property.[26]

California Register of Historic Resources

The California Register of Historical Resources (California Register) is "an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change."[27] The California Register was enacted in 1992, and its regulations became official on January 1, 1998. The California Register is administered by the California Office of Historic Preservation (OHP). The criteria for eligibility for the California Register are based upon National Register criteria.[28] Certain resources are determined to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register. To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, State, and/or federal level under one or more of the following four criteria:

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.

2. Associated with the lives of persons important to local, California or national history.

3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.

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

    - The California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register includes the following: California properties formally determined

26 National Register Bulletin #15, 44-45.

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

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

eligible for (Category 2 in the State Inventory of Historical Resources), or listed in (Category 1 in the State Inventory), the National Register of Historic Places.

- State Historical Landmark No. 770 and all consecutively numbered state historical landmarks following No. 770. For state historical landmarks preceding No. 770, the Office of Historic Preservation (OHP) shall review their eligibility for the California Register in accordance with procedures to be adopted by the State Historical Resources Commission (commission).

- Points of historical interest which have been reviewed by the OHP and recommended for listing by the commission for inclusion in the California Register in accordance with criteria adopted by the commission.[29]

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

- Individual historic resources.

- Historic resources contributing to the significance of a historic district.

- Historic resources identified as significant in historic resources surveys, if the survey meets the criteria listed in subdivision (g).

- Historic resources and historic districts designated or listed as city or county landmarks or historic properties or districts pursuant to any city or county ordinance, if the criteria for designation or listing under the ordinance have been determined by the office to be consistent with California Register criteria.

- Local landmarks or historic properties designated under any municipal or county ordinance.[30]

City of Los Angeles Historic-Cultural Monuments

The City of Los Angeles Cultural Heritage Ordinance, enacted in 1962, allows for the designation of buildings and sites as individual local landmarks in the City of Los Angeles. These landmarks are known as "Historic-Cultural Monuments."

Section 22.171.7 of Article 1, Chapter 9, Division 22 of the City of Los Angeles Administrative Code defines a Historic-Cultural Monument as "any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles." A proposed Monument may be designated by the City Council upon the recommendation of the Cultural Heritage Commission if it meets at least one of the following criteria:

29 Public Resources Code Section 5023.1(d).

30 Public Resources Code Section 5023.1(e).

1. Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community;

2. Is associated with the lives of historic personages important to national, state, city, or local history; or

3. Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

Designation recognizes the unique architectural value of certain structures and helps to protect their distinctive qualities. Any interested individual or group may submit nominations for Historic-Cultural Monument status. Buildings may be eligible for Historic-Cultural Monument status if they retain their historic design and materials. Those that are intact examples of past architectural styles or that have historical associations may meet the criteria listed in the Cultural Heritage Ordinance.

Hollywood Community Plan Area

The Project Site is located within the planning boundary of the Hollywood Community Plan Area (CPA). The Hollywood Community Plan was adopted in December 1988 and is one of thirty-five Community Plans that comprise the Land Use Element of the City of Los Angeles' General Plan. The General Plan is the City's fundamental policy document, directing the City's future growth and development.

The Hollywood Community Plan does not specifically address historic resources; however, a stated objective of the plan is to "encourage the protection and enhancement of the varied and distinctive residential character of the Community…" In addition, the Housing Policy in the Community Plan version "encourages the protection and enhancement of well-defined residential neighborhoods in Hollywood through (1) application of Historic Preservation Overlay Zones where appropriate, and/or (2) preparation of neighborhood preservation plans which further refine and tailor development standards to neighborhood character."[31]

The Plan also reiterates that it is "the City's policy that the Hollywood Community Plan incorporate the sites designated on the Cultural and Historical Monuments Element of the General Plan."[32]

SurveyLA

The Project Site is located within the City of Los Angeles, which has been subject to a citywide historic resources survey known as SurveyLA. SurveyLA, the Los Angeles Historic Resources Survey, is the City's comprehensive program to identify and document potential historic resources

31 "Hollywood Community Plan," December 13, 1988, https://planning.lacity.org/odocument/78322462-6303-410a-ae8d-8435483c3b41/Hollywood_Community_Plan.pdf (accessed August 2022).

32 "Hollywood Community Plan."

throughout the City of Los Angeles. SurveyLA is intended to provide baseline information on historic resources to inform planning decisions and support City policy goals and processes.[33]

As part of SurveyLA, the Office of Historic Resources has developed a Historic Context Statement (HCS) to provide a framework for identifying and evaluating potential historic resources within the City of Los Angeles. The HCS utilizes the Multiple Property Documentation (MPD) format developed by the National Park Service for the National Register of Historic Places and complies with the standards and guidelines set forth by the National Park Service and the California Office of Historic Resources.[34] This approach organizes the themes, trends, and patterns of history shared by properties into historic contexts; identifies and describes historic resources or property types that represent the contexts; and provides specific standards to guide the evaluation of significance. The SurveyLA HCS is organized into nine broad historical contexts, which are specific to Los Angeles and focus on the development of the City during the period dating from 1780 to 1980, and further subdivided into themes and sub-themes that reflect the various historical trends and patterns of events associated with each context.[35]

SurveyLA surveys of the City of Los Angeles were organized by Community Plan Area (CPA). The Project Site falls within the boundaries of the Hollywood CPA, which was surveyed most recently as part of SurveyLA in 2015.[36]

Summary of Previous Evaluations

In order to determine whether the properties located within or adjacent to the Project Site have been subject to previous historic resource evaluation and/or designation, HRG consulted several sources related to the status of historic resources in Los Angeles. These sources included both online and physical repositories such as ZIMAS, HistoricPlacesLA (HPLA), and the State of California's Built Environment Resources Directory (BERD). These repositories, the scope of their data, and resultant findings are discussed in greater detail below.

Zone Information and Map Access System (ZIMAS)

The Zone Information and Map Access System, more commonly known as ZIMAS, is an online portal developed by the City of Los Angeles Department of City Planning to provide digital access

33 SurveyLA Los Angeles Historic Resources Survey, "Field Survey Results Master Report," August 2016, https://planning.lacity.org/odocument/c118f301-cc39-4ede-af5a-3e5ec901e7be/SurveyLA_Master_Report.pdf (accessed August 2022). Resources identified through SurveyLA are not designated resources; designation is a separate process that requires public hearings and property owner notification.

34 SurveyLA Los Angeles Historic Resources Survey, "Los Angeles Citywide Historic Context Statement: Context Outline, Revised January 2020," https://planning.lacity.org/odocument/fbb3582b-b6b0-4fb7-b27a-dbabacd760aa/SurveyLA_HistoricContextStatementOutline_July2018.pdf (accessed August 2022).

35 SurveyLA Los Angeles Historic Resources Survey, "Los Angeles Citywide Historic Context Statement: Context Outline, Revised January 2020."

36 SurveyLA Los Angeles Historic Resources Survey, "Historic Resources Survey Report: Hollywood Community Plan Area," prepared for the City of Los Angeles Department of City Planning Office of Historic Resources by Historic Resources Group, August 2011, revised November 2015, https://planning.lacity.org/odocument/7de89dca-89c9-494e-8e72-e67694613161/SurveyLAHollywood_SurveyReport.pdf (accessed August 2022).

to zoning-related information for specific properties.[37] While ZIMAS does not include records of previous historic resource evaluations for specific properties, such as those evaluations undertaken as part of citywide historic resources surveys, it does identify prior historic designations associated with a specific property that have been awarded at the local, state, or federal level.

A review of ZIMAS did not identify any designated resources within the boundaries of the Project Site or within the vicinity of the Project Site.

HistoricPlacesLA (HPLA)

HistoricPlacesLA is the City of Los Angeles's online historic resource inventory and management system. The website includes information collected for SurveyLA and other historic resources surveys. Also included are Los Angeles Historic-Cultural Monuments, Historic Preservation Overlay Zones, and properties listed in the National Register of Historic Places and California Register of Historical Resources.[38] Most significantly, HistoricPlacesLA includes information on properties identified as eligible for designation through SurveyLA, the Los Angeles Historic Resources Survey, and equivalent surveys utilizing SurveyLA methodology.[39]

A review of HPLA did not identify any eligible resources within the boundaries of the Project Site or within the vicinity of the Project Site.

According to HPLA, the nearest eligible resource is the Brevoort Hotel at 6326 West Lexington Avenue. Surveyors found the property to be eligible for national, state, and/or local designation under Criterion A/1/1 as a "rare example of a 1920s residential hotel in Hollywood; one of [the] few remaining examples from this period." [40] The nearest designated resource is the Villa Elaine at 1237-1249 North Vine Street, which was designated as Los Angeles Historic-Cultural Monument No. 675 in 2000.[41] Although these properties are located outside the vicinity of the Project Site, they are noted here for reference.

Built Environment Resources Directory (BERD)

The Built Environment Resources Directory (BERD) files provide information, organized by county, regarding non-archaeological resources included in the inventory of the California Office

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37 ZIMAS can be accessed at http://zimas.lacity.org/. Designation information, if applicable, may be found by searching for a specific property and then clicking on the dropdown menu for "Planning & Zoning." Designation status will be noted under "Historic Preservation Review."

38 "Historic Resources Surveys: HistoricPlacesLA," https://planning.lacity.org/preservation-design/historic-resources-survey (accessed August 2022).

39 HistoricPlacesLA, "About the Data," http://historicplacesla.org/about_data (accessed August 2022). Please note that as of this writing, a "significant percentage," but not all, designated Los Angeles Historic-Cultural Monuments are listed in HPLA. Until such time as the data for all designated resources has been updated, refer to ZIMAS for confirmation of prior historic designation.

40 HistoricPlacesLA, "Brevoort Hotel," http://historicplacesla.org/reports/0ac32c90-f731-4cfa-b38b-313dc3783132 (accessed August 2022).

41 HistoricPlacesLA, "Villa Elaine," http://historicplacesla.org/reports/741eb36d-b9af-4161-b1f8-8f3c4efd8a0e (accessed August 2022). Per HPLA, the property is designated for its association with artist and photographer Man Ray, who resided at the property from 1940 to 1951.

of Historic Preservation (OHP).[42] The BERD inventory contains information only for cultural resources that have been processed through the OHP. This includes resources reviewed for eligibility to the National Register of Historic Places and the California Historical Landmarks programs through federal and state environmental compliance law, and resources nominated under federal and state registration programs. The BERD replaces the previous Historic Resources Inventory (HRI).

A review of the Built Environment Resources Directory identified the following resources. Please note that while ZIMAS addresses have been utilized for consistency elsewhere in this report, in this instance addresses are noted as they appear in the BERD. Addresses are listed in the BERD as they were documented at the time of survey or evaluation and may reflect historical street addresses that are inconsistent with contemporary numbering. As assessor parcel numbers are not included in the BERD, it is not possible to confirm which address(es) correspond to a particular parcel.

A review of the BERD identified the following resources:

- Nine properties within the boundary of the Project Site are currently included in the BERD.
    1. The two properties at 1206 and 1210 North Cahuenga Boulevard have all been assigned a status code of 5D2, or "Contributor to a multi-component resource that is eligible for local listing or designation."[43] Both properties are listed with construction dates of 1916. However, as demolition permits were filed for both of these addresses in 1980[44] and the properties are currently improved with institutional facilities initially constructed in 1982, it appears that these evaluations correspond to residences that have since been demolished. Consequently, these evaluations do not apply to the current facilities.

    2. The seven properties at 6332, 6336, 6340, 6344, 6348, 6352, and 6356 West La Mirada Avenue have all been assigned a status code of 7N, or "Needs to be reevaluated – formerly coded as may become [National Register] eligible with restoration or other specific conditions."[45] All seven properties are listed with construction dates of 1923. However, as demolition permits were filed for all seven of these properties between 1986 and 2003,[46] and the properties are currently improved with institutional facilities of recent construction, it appears that these evaluations

42 Description of the scope of the California BERD has been excerpted from the Built Environment Resource Directory (BERD), California Office of Historic Preservation, https://ohp.parks.ca.gov/?page_id=30338 (accessed November 2020).

43 California Office of Historic Preservation, "California Historical Resource Status Codes, Current as of 3/1/2020," https://ohp.parks.ca.gov/pages/1068/files/Resource-Status-Codes.pdf (accessed August 2022).

44 See permits #1980LA04770 (1210 North Cahuenga Boulevard) and #1980LA04771 (1206 North Cahuenga Boulevard).

45 California Office of Historic Preservation, "California Historical Resource Status Codes, Current as of 3/1/2020."

46 Refer to Appendix C of this IS/MND for demolition permits for specific properties.

correspond to residences that have since been demolished. Consequently, these evaluations do not apply to the current facilities.

- Twelve properties and three additional resources in the vicinity of the Project Site are currently included in the BERD.

    1. The 1100-1300 blocks of North Cahuenga Boulevard have been assigned a status code of 5S2, or "Individually eligible for local listing or designation."[47] However, no potential historic district has been identified in this area in more recent comprehensive surveys of Hollywood.

    2. The 6300 block of West La Mirada Avenue has been assigned a status code of 7N, or "Needs to be reevaluated – formerly coded as may become [National Register] eligible with restoration or other specific conditions."[48] However, no potential historic district has been identified in this area in more recent comprehensive surveys of Hollywood.

    3. The 6300 block of West Lexington Avenue has been assigned a status code of 5S2, or "Individually eligible for local listing or designation."[49] However, no potential historic district has been identified in this area in more recent comprehensive surveys of Hollywood.

    4. The nine properties at 6327, 6328, 6333, 6337, 6341, 6345, 6349, 6353, and 6357 West La Mirada Avenue have all been assigned a status code of 7N, or "Needs to be reevaluated – formerly coded as may become [National Register] eligible with restoration or other specific conditions."[50] All nine properties were constructed in 1922-1923. However, none of these properties have been identified in more recent comprehensive surveys of Hollywood, nor has a potential historic district been identified in this area.

    5. The three properties at 6330-6332, 6340-6342, and 6344 West Lexington Avenue have all been assigned a status code of 5D2, or "Contributor to a multi-component resource that is eligible for local listing or designation."[51] All three properties are listed with construction dates of 1921; however, the property 6330-6332 West Lexington Avenue is presently improved with a multi-family residence constructed in 2007. Neither property at 6340-6342 West Lexington Avenue nor 6344 West Lexington Avenue has been identified in more recent comprehensive surveys of Hollywood, nor has a potential historic district been identified in this area.

It should be noted that while no survey date is given in conjunction with the survey results listed in the BERD, these previous evaluation records likely correspond to survey efforts undertaken in the 1980s. At that time, the survey methodology for historic resources in California often evaluated

47 California Office of Historic Preservation, "California Historical Resource Status Codes, Current as of 3/1/2020."
48 California Office of Historic Preservation, "California Historical Resource Status Codes, Current as of 3/1/2020."
49 California Office of Historic Preservation, "California Historical Resource Status Codes, Current as of 3/1/2020."
50 California Office of Historic Preservation, "California Historical Resource Status Codes, Current as of 3/1/2020."
51 California Office of Historic Preservation, "California Historical Resource Status Codes, Current as of 3/1/2020."

groupings of buildings based on their location, rather than their shared historic context. The result was a collection of buildings identified by address blocks on individual streets, such as "the 300-400 blocks of Main Street;" a similar grouping on an adjacent block or street might then be identified as "the 500-600 blocks of Main Street" or "the 100-200 blocks of Elm Street," with no explanation provided for how these collections of resources might be related. Today, best practices for historic resources surveys requires that groups of contiguous buildings dating from the same period of development and sharing similar historic contexts be identified as a single historic district, regardless of street address or block delineation. None of the properties previously noted in the BERD as contributors to a potential historic district have been identified as such in more recent comprehensive surveys of potential historic resources in Hollywood, nor have any potential historic districts been identified within the boundaries of the Project Site or in the vicinity of the Project Site.

Description of the Surrounding Area

The area that became Hollywood was originally part of two former Spanish land grants: Rancho La Brea and Rancho Los Feliz.[52] These two ranchos were oriented along the Cahuenga Pass, a major transportation corridor to the north, and the growing city of Los Angeles to the south. The Cahuenga Pass encompassed part of the Camino Real del Rey, which was the principal coastal passageway and used continuously as a trail facilitating commerce, livestock transport, and travel since the earliest Spanish exploration. Hollywood began as a small agricultural community in the nineteenth century. Farmers, many of whom were European immigrants, experimented in cultivating a wide variety of exotic fruits, vegetables, and flowers. A freight rail line was first constructed in 1887-1888, linking Hollywood and the neighboring community of Colegrove to downtown Los Angeles. The fields and orchards of the nineteenth century increasingly gave way to speculative real estate development by the turn of the twentieth century.

In 1900, the Cahuenga Valley Improvement Association was established to guide real estate development in the area, just as the first electric track down the length of Prospect Avenue (present day Hollywood Boulevard) was completed.[53] Other streetcar lines soon followed, including along Melrose Avenue, La Brea Avenue, Santa Monica Boulevard, Highland Avenue, Vine Street, Western Avenue, Vermont Avenue, Virgil/Hillhurst Avenues, Kenmore Avenue, Fountain Avenue, Talmadge Street, Hyperion Avenue, Los Feliz Boulevard, and Beachwood Drive.

In 1903, the City of Hollywood officially incorporated with a population of 700. In 1904, gas lines were laid, the streets were numbered, and a single track of the Los Angeles Pacific Railroad was placed perpendicular to the electric track already on Prospect Avenue.[54] As the area became increasingly developed, churches, clubs, and schools were built in proximity to the grand single-family residences that lined Hollywood Boulevard and other nearby streets. By 1909, like many of its neighboring communities, Hollywood had experienced immense growth. While its

52 Discussion of the history of the surrounding area has been excerpted and adapted from SurveyLA Los Angeles Historic Resources Survey, "Historic Resources Survey Report: Hollywood Community Plan Area."

53 Gregory Paul Williams, The Story of Hollywood: An Illustrated History (BL Press LLC, 2011), 29.

54 Williams, 43.

population in 1903 was a mere 700, by 1909 it had reached 4,000.[55] Though dwarfed by the neighboring city of Los Angeles with 100,000 inhabitants, the small City of Hollywood quickly began to experience water shortages, drainage issues, and sewage problems, and less than ten years later Hollywood began to reconsider its status as an independent city.[56] In February of 1910, Hollywood was consolidated to the City of Los Angeles to take advantage the City's established sewer system and the anticipated new water supply created by the Los Angeles Aqueduct, which was then under construction. The pre-consolidation area boundary is generally defined by the southernmost portion of the Hollywood Hills to the north, Fountain Avenue to the south, Crescent Heights Boulevard to the west, and Mariposa Street to the east.

Although now formally part of the City of Los Angeles, Hollywood continued to maintain its own identity, which was tied directly to the growth of the motion picture industry. By this time Hollywood was no longer a small independent city struggling to deal with infrastructure problems, but a thriving suburb with a rapidly growing population and the home of a significant national industry. As the popularity of motion pictures grew, more physical facilities related to film production were constructed in Hollywood, and the industry contributed significantly to the area's overall industrial growth. From the 1910s through the boom of the 1920s and into the 1930s, Hollywood experienced tremendous population growth. Hollywood reached its heyday in the 1920s, when a large number of movie studios, theaters, and shopping centers filled Hollywood and Sunset Boulevards between Vine Street and Highland Avenue. To accommodate the increased demand for housing as well as services and amenities, residential and commercial development in Hollywood increased dramatically. The large parcels of land which were once occupied by a bucolic landscape of citrus groves and single-family residences were disappearing, replaced more and more frequently by dense urban development.

As the Hollywood district began to grow more commercial in nature beginning in the late teens, it also began to lose its status as a prestigious address. Many of the mansions that lined Hollywood Boulevard were abandoned by 1925, as developments such as Hancock Park and Beverly Hills drew elite residents away from the district.[57] In the mid-to-late 1930s, the glamorous image of Hollywood as a national fashion and entertainment destination began to fade. This was due in part to the effects of the Great Depression. During this era, the district experienced little in the way of growth but much in the way of increased activity in a manner that reinforced Hollywood's role as a hub between Los Angeles and adjacent communities.

By the 1980s the Hollywood community was in a state of economic decline; the Community Redevelopment Agency of Los Angeles established the Hollywood Redevelopment Project Area in 1986 to encourage development in the area. Among the goals of the agency were to revitalize the historic core and preserve historically significant buildings.

By the dawn of the new millennium, Hollywood began to experience a resurgence that continues today. The establishment of the city's Adaptive Reuse ordinance greatly facilitated the reuse of

55 Bruce T. Torrence, Hollywood: The First 100 Years (Hollywood, CA: Hollywood Chamber of Commerce & Fiske Enterprises, 1979), 9.

56 Williams, 52-53.

57 Williams, 132.

under-utilized historic buildings into new housing. New, large-scale mixed-use projects – Hollywood & Highland (including the Kodak Theater), the Renaissance Hotel, the W Hotel at Hollywood and Vine – along with the Red Line subway stations, have helped to revitalize Hollywood's streets and its economy, bringing with it an influx of new residents and tourists, higher rents, and new development pressures.

Today, Hollywood contains a wide range of building types, including single- and multi-family residences, along with commercial, institutional, and industrial properties. Extant properties remain from every significant period of development in Hollywood, and together they represent an impressive range of historical themes and property types.

Description of Project Site

Architectural Description

The Project Site represents the school campus originally developed as the Arshag Dickranian Armenian School, and later occupied by the Stratford School. The site is generally rectangular in plan and is bordered on all four sides by a concrete block wall and/or a metal security fence. Gated vehicular access to the site is offered from West La Mirada Avenue to the north and West Lexington Avenue to the south. Controlled pedestrian access is offered from West Lexington Avenue and North Cahuenga Boulevard.

The Project Site is currently improved with a group of school buildings, which are situated in the southern and eastern portions of the site, as well as two playgrounds, a concrete basketball court, an athletic field of artificial turf, and a subterranean parking garage, which are situated in the northern portion of the site. Building permits for construction activity undertaken within the Project Site are included in Appendix C of this IS/MND.

Constructed in 1980, the main school building is situated in the southwestern corner of the property and is set back from the sidewalk to the south and east. The building has an irregular plan and complex massing. It is composed of three smaller, irregularly-shaped component buildings connected by a series of covered breezeways. The building is two stories in height and is of wood frame construction, with a flat roof of rolled asphalt with a parapet and a penthouse.

Façades are asymmetrically composed and finished in smooth cement plaster. The primary entrance is located on the south façade, fronting West Lexington Avenue, and is accessed via a semicircular driveway or an adjacent pedestrian entrance; both are enclosed by metal security gates. The entrance consists of a flight of shallow concrete steps with metal railings that lead to pair of metal security doors flanked by metal transom grilles. Fenestration consists primarily of single or grouped fixed windows with contemporary projecting surrounds.

An addition to the main school building, which was constructed in 2003, is situated immediately to the east and is connected to the main building by a breezeway, which is topped at the second story by a covered balcony surrounded by a metal railing. The building is set directly at the sidewalk to the south, and has a generally rectangular plan with simple massing. It is two stories in height atop a subterranean parking garage and is of wood frame construction with a front-gable roof of rolled asphalt with a parapet and solar panels. Façades are asymmetrically composed

and finished in smooth cement plaster. The primary (south) façade fronting West Lexington Avenue is primarily characterized by the vehicular entrance to the building's subterranean parking garage, which is set at the street and enclosed by a metal security gate. A secondary pedestrian entrance to the garage is situated to the west of the vehicle ramp and consists of a pair of metal security gates topped with a transom grille. At the second story, there is a projecting balcony enclosed by a balcony wall and sheltered by a projecting canopy. Fenestration is mixed and consists primarily of contemporary single and grouped fixed windows with divided lights.

Site History

Development History

The land comprising the subject property was first recorded as part of the Colegrove Tract (MR053-010), which was subdivided from a portion of the Rancho La Brea in 1893.

Rancho La Brea originated as a Mexican land grant awarded to Antonio José Rocha and Nemisio Dominguez in 1828.[58] (Dominguez sold his interest in the land grant to Antonio José Rocha's son of the same name.) Following the elder Antonio Rocha's death in 1837, claim to the land passed to his family and was confirmed in 1840. The claim was situated to the east of the Rancho Rodeo de las Aguas and encompassed one square league – over 4,400 acres that spanned roughly the area bounded by present-day Sunset Boulevard to the north, Gower Street to the east, Wilshire Boulevard to the south, and San Vicente Boulevard to the west.

The subsequent passage of the California Land Act in 1851 required all Spanish and Mexican land grant owners to prove their title to the land that had been granted to them. Antonio Rocha's heirs enlisted the assistance of Henry Hancock (1822-1883), an attorney and civil engineer who is known today for conducting some of the earliest land surveys of the City of Los Angeles. Hancock had taken up residence on the Rancho La Brea following his arrival in Los Angeles in 1850, and had soon become well known to the Mexican and Spanish landowners in the area, many of whom were now in the midst of proving their claims to the land on which they had settled and found Hancock to be a valuable asset. In addition to Hancock's legal background, "he was an expert in settling grants because [of] his familiarity with Mexican and Spanish customs and all concerned felt, to put it popularly, that they had received a square deal."[59] The Rocha family sought the assistance of Henry Hancock in proving their claim to the Rancho La Brea land, which proved to be a protracted process as there was some confusion over the boundaries of the rancho as they related to the extent of the nearby pueblo settlement, El Pueblo de Nuestra Señora la Reina de los Ángeles. It took nearly twenty years for the Rocha family's claim to make its way

58 The history of the rancho has been derived from information included in the Works Progress Administration Abstract (WPA Abstract), a summary document prepared in 1938 under the Works Progress Administration program detailing the history of the rancho beginning with the Spanish-American land through the U.S. patenting process. The WPA Abstract for the rancho is available at "La Brea, Diseños 487, GLO No. 429, Los Angeles County, and associated historical documents," California State University, Monterey Bay, https://digitalcommons.csumb.edu/hornbeck_usa_4_a_lac/16/ (accessed August 2022). The narrative has been supplemented with additional information from Florence Josephine Seaman, "A Brief History of Rancho La Brea," Annual Publication of the Historical Society of Southern California 9, no. 3 (1914): 253-256, https://www.jstor.org/stable/41168712 (accessed August 2022).

59 Seaman, 253.

through the courts, and during that time, Jose Jorge Rocha eventually deeded the rancho to Henry Hancock's brother, John, in November 1860. It was not uncommon for lawyers defending land claims to accept the land itself as payment for their services, and it was likely in this manner that the Hancocks came to own the majority of the Rancho La Brea.

The land was still in dispute, however, and it now fell upon Henry Hancock to confirm the claim. Hancock approached his friend and fellow attorney, Cornelius Cole (1822-1924), who had been elected to the United States Senate in 1863, and asked him to have the title to the land perfected in the United States Supreme Court. In December 1869, the Supreme Court affirmed the Rocha family's claim – and, by extension, Hancock's claim – to the Rancho La Brea land, and the patent for the land was issued in 1873.

In exchange for his assistance, Henry Hancock had promised Cornelius Cole a one-tenth share of the rancho land in exchange for Cole's handling of the case before the Supreme Court.[60] Cole ultimately selected approximately 480 acres to the south of the fledgling community of Hollywood and dubbed the area "Colegrove," after his wife's maiden name. By 1877 Cole had settled his family on the land,[61] constructing a residence at the northwest corner of Santa Monica Boulevard and North Gower Street and developing a robust agricultural operation that included the cultivation of apricots, watermelon, lemons, oranges, corn, wheat, and rye. Although acreage in Colegrove was offered for sale publicly as early as 1887, suggesting that Cole had already made a survey of the land, no formal subdivision was recorded until 1893, when approximately four hundred acres of Cole's land was surveyed and subdivided as the Colegrove tract (MR053-010).[62] The land was divided into five- and ten-acre lots, which were initially offered for sale at auction in March 1893.[63]

The land comprising the subject property was first subdivided as part of Block 13 of the Colegrove tract. The present-day Project Site encompasses land from two different lots in Block 13 – Lot 3 and Lot 5 – and as a result its initial development reflects two separate and distinct efforts, although the lots were later combined to create the current parcel.

The earlier of the two development efforts occurred in the southern portion of the block. The southern portion of the Project Site – those six lots fronting present-day West Lexington Avenue to the south and North Cahuenga Boulevard to the west[64] – represented a portion of Lot 5 of Block 13 and was subdivided as part of Tract No. 774 (MB 016-096A) in 1910 by owners John A. Myers and C. C. Hill.[65] Sanborn fire insurance maps indicate that four of the six lots had been improved with single-family residences by 1919, and a fifth lot had been improved with a duplex.

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60 Seaman, "A Brief History of Rancho La Brea," 255.

61 "House and Lot: A Cahuenga Subdivision," Los Angeles Times, March 4, 1893.

62 See "House and Lot: A Cahuenga Subdivision," Los Angeles Times, March 4, 1893. Advertisements for the sale of the land began to appear in the Los Angeles Times as early as November 1887.

63 "Auction at Colegrove," Los Angeles Times, March 26, 1893. See also "House and Lot: The Cahuenga," Los Angeles Times, April 1, 1893. Along with the neighboring community of Hollywood to the north, Colegrove was subsequently annexed to the City of Los Angeles in 1909.

64 These lots are distinguished as Parcel A in plans furnished by the Applicant.

65 Present-day West Lexington Avenue was originally known as Emilita Avenue.

The remaining vacant lot at 6337 West Lexington Avenue was improved with a single-family residence later that same year.[66]

The northern portion of the Project Site – those seven lots fronting present-day West La Mirada Avenue to the north[67] – represented a portion of Lot 3 of Block 13 and remained undeveloped until 1921, when it was subdivided as part of Tract No. 4622 (MB 045-047) by owners Duncan and Sophia McDonald and the Security Trust & Savings Bank.[68] This tract also included those parcels to the north of West La Mirada Avenue –which was originally known as McDonald Place in honor of its initial developers –between North Cahuenga Boulevard to the west and North Vine Street to the east. Construction records indicate that the development of the tract appears to have been something of a speculative venture for Duncan McDonald, given that he is listed as the owner on the majority of building permits for residences constructed on the block, and that all of the permits showing McDonald – who was a builder – as the owner were filed in 1922. In September 1922, the Hollywood Citizen-News noted that "six of 24 proposed bungalows are completed on McDonald Place. Five more have been plastered and will be ready for occupancy soon, after which the remaining 11 will be constructed. The work is being done by D. McDonald Building Company."[69] According to permit records, the remaining handful of undeveloped residential lots on the block were improved in 1923 by another developer.

The land comprising the Project Site and the properties in the vicinity of the Project Site remained residential in character until the 1980s, when redevelopment prompted the block to assume its current form.

Development of the Dickranian School

Development of the subject property as it exists today originated in 1980, when Armenian businessman and philanthropist Arshag Dickranian donated money to purchase a parcel of land in Hollywood for the development of an Armenian school. Dickranian's acquisition of the parcel was part of a wider philanthropic effort; in 1950, he had established the Armenian Educational Foundation, and later went on to establish thirteen Armenian schools throughout California.[70] The Hollywood land purchased by Dickranian in 1980 comprises the present-day subject property, which was originally developed in its current form as the TCA Arshag Dickranian Armenian School, one of the thirteen schools established by Dickranian.

Based on development and expansion patterns over time, the initial land acquisition likely represented the majority of the Project Site's present southern portion and included Lots 1, 2, 3, and 4 of Tract No. 774. In June 1980, these lots were cleared to allow for construction of the school; four residences were demolished at 1200, 1206, and North 1210 Cahuenga Boulevard and 6347 West Lexington Avenue.[71] In July 1980, permits were filed for the construction of a

66 See permit #1919LA11898.

67 These lots are distinguished as Parcel B in plans furnished by the Applicant.

68 Present-day West La Mirada Avenue was originally known as McDonald Place.

69 "Court is Built," Hollywood Citizen-News, September 11, 2022.

70 "Arshag Dickranian; Philanthropist and Armenian School Founder," Los Angeles Times, April 27, 1996.

71 See permits #1980LA04772, 1980LA04771, #1980LA04770, and #1980LA04769.

new elementary school on the site, to be designed by architect Garo Minassian.[72] In September 1981, the site opened as the TCA Arshag Dickranian Armenian School, with 44 students enrolled from kindergarten through the fourth grade.[73] The Dickranian School continued to grow over time by adding a class each year, and within a few years it became necessary to expand the school's facilities. In September 1986, Lot 19 of Tract No. 4622 was cleared to accommodate construction of temporary classrooms to the north of the main school building; one residence was demolished at 6356 West La Mirada Avenue.[74] In August 1988, Lots 20, 21, and 22 of Tract No. 4622 were cleared to develop new athletic fields; three residences were demolished at 6352, 6348, 6344 West La Mirada Avenue.[75]

In 1990, the Dickranian School presented its first graduating class of sixteen students.[76] The school continued to expand, and in June 1991, two new classrooms were added to the building's second floor.[77]

In July and August 1999, two lots to the east of the existing school building - Lots 5 and 6 of Tract No. 774 – were cleared; three residences were demolished at 6341-6343 and 6337 West Lexington Avenue.[78] Although this site would eventually become the home of a new addition to the school, construction did not commence for several years. In June 2003, Lots 23, 24, and 25 of Tract No. 4622 were also cleared to accommodate new improvements to the school campus; three residences were demolished at 6340, 6336, and 6332 West La Mirada Avenue.[79] That same month, permits were filed for the construction of a new underground parking garage to the north of the school, as well as an addition to the east of the existing school building to house an auditorium and additional classrooms.[80] This work represented a major expansion effort by the school and added prekindergarten and kindergarten facilities with an age-appropriate playground, a new two-story wing containing a high school department, the Walter & Laurel Karabian Hall, a new subterranean parking garage for 110 cars, and new athletic fields.[81]

In 2015, the Tekeyan Cultural Association announced that it would be closing the Dickranian School and selling the property. The Arshag Dickranian School closed its doors on June 30, 2015. The property was later acquired by the Stratford School, a private school serving students in the pre-kindergarten through fifth grades, and the site reopened as the Stratford School's Melrose Campus for the 2016-2017 school year.[82]

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72 See permit #1980LA06581.

73 "History," TCA-Arshag Dickranian Armenian School, https://dickranianschool.org/history (accessed August 2022).

74 See permits #1986LA46421 and #1986LA49453.

75 See permits #1988LA07027 and #1988LA07026.

76 "History," TCA-Arshag Dickranian Armenian School.

77 See permit #1991LA77055.

78 See permits #99019-20000-00791, #99019-20000-00792, and #99019-20000-00790.

79 See permits #03019-30000-00885, #03019-30000-00888, and #03019-30000-00887.

80 See permits #02014-20000-05515, #02014-20001-05515, and #02014-20002-05515.

81 "History," TCA-Arshag Dickranian Armenian School.

82 "Stratford Private Schools in Los Angeles Area," Stratford School, archived from the original athttps://web.archive.org/web/20160321194233/http://www.stratfordschools.com/socal, captured March 21, 2016 (accessed August 2022).

The Stratford School subsequently closed its Melrose campus, and in December 2021 it was announced that the property would be redeveloped as an office complex.

Historic Context

The subject property at 1200 North Cahuenga Boulevard was designed by Garo Minassian and initially constructed in 1980, with subsequent additions in 1991 and 2003.

Given the property's relatively recent construction, the Project Site falls well outside the period of significance associated with any relevant historic context and theme related to institutional development, and does not allow for the building to possess historical associations with important patterns and trends in institutional development. In addition, research did not identify any other important historical associations with events, trends, or individuals, and the building is not architecturally distinguished such that it warrants examination under other historic contexts related to architectural qualities or merit in architectural design and/or craftsmanship.

For these reasons, the subject property at 1200 North Cahuenga Boulevard does not appear to be associated with a particular historic context and does not warrant evaluation as a potential individual historic resource. Therefore, the property does not meet the requirements for consideration as an individually eligible historical resource for the purposes of CEQA.

Historic Resources Assessment

Potential Impacts to Properties in the Vicinity of the Project Site

As stated above, review of previous evaluations indicates that there are no historical resources present within the vicinity of the Project Site.

As no historical resources exist within the vicinity of the Project Site, the proposed Project does not have the potential to result in significant impacts to historical resources for the purposes of CEQA.

Potential Impacts to Properties Outside the Vicinity of the Project Site

As stated above, a review of previous evaluations indicates that there two historical resources present just outside the Project Site vicinity. The nearest eligible resource is the Brevoort Hotel at 6326 West Lexington Avenue which is located southeast of the Project Site on the south side of Lexington Avenue.[83] The nearest designated resource is the Villa Elaine at 1237-1249 North Vine Street, which is located mid-block on the block immediately north of the Project Site.[84]

Because all construction activity associated with the Project is would be contained within the Project Site, and because both the Brevoort Hotel and the Villa Elaine are located at a considerable distance from the Project Site, potential impacts to these resources are not

83 HistoricPlacesLA, "Brevoort Hotel," http://historicplacesla.org/reports/0ac32c90-f731-4cfa-b38b-313dc3783132 (accessed August 2022).

84 HistoricPlacesLA, "Villa Elaine," http://historicplacesla.org/reports/741eb36d-b9af-4161-b1f8-8f3c4efd8a0e (accessed August 2022).

anticipated. They were not, therefore, included within the Project vicinity where potential impacts might be anticipated. The Project does not include the demolition, relocation, rehabilitation, alteration or conversion of the either the Brevoort Hotel or the Villa Elaine properties. Both buildings would remain unchanged after implementation of the Project and the Project would not result in adverse impacts to either building.

Once built, the Project would alter the broader surroundings of both the Brevoort Hotel and the Villa Elaine by placing a newly-constructed building to the south of Villa Elaine and northwest of the Brevoort Hotel, which has the potential to alter existing spatial relationships in the area where both buildings played their historical roles. The Villa Elaine and the Brevoort Hotel were erected in 1925 and 1927, respectively; by that time, much of the surrounding neighborhood that functions as the larger setting of both buildings was already largely built out with a collection of single- and multi-family residences to the west between North Cahuenga Boulevard and North Vine Street, along with examples of commercial and institutional development along the west side of North Vine Street.86 However, this area has evolved since its initial development in the 1920s; most notably, the block bounded by West La Mirada Avenue to the north, North Vine Street to the east, West Lexington Avenue to the south, and North Cahuenga Boulevard to the west – which includes the Project Site – has been wholly redeveloped since the 1960s and already does not reflect its original historic development condition. As the Project Site is located within this block, construction associated with the proposed Project would be limited to parcels that have already been redeveloped and as a result do not currently reflect their original historic condition. Consequently, while the larger setting of both the Brevoort Hotel and the Villa Elaine will be somewhat altered by the Project, changes to the larger setting of both buildings would be limited to existing non-historic parcels and would not materially impair the continued ability of the Brevoort Hotel or the Villa Elaine to convey their respective historic character and identity. In addition, new construction on the Project Site would not interfere with the visual and spatial relationships between the Brevoort Hotel and Villa Elaine and their immediate surroundings. As one existing building on the Project Site will be repurposed and proposed new construction is limited to two four-story buildings, the Project does not represent a significant visual intrusion within the pattern of established visual and spatial relationships present in the surrounding neighborhood. Thus, integrity of setting would be retained for both properties.

The Project would not affect the integrity of location, design, setting, materials, workmanship or association of either the Brevoort Hotel or the Villa Elaine. Both would remain intact in their current locations and would not be materially altered by the demolition and new construction associated with the Project. Therefore, integrity of feeling would also remain unaffected because all the existing physical elements that characterize the Brevoort Hotel and the Villa Elaine would continue to convey their historic significance. All of the aspects of integrity for the Brevoort Hotel and the Villa Elaine would be unaffected by the Project, and the historic integrity of both properties would be retained. After construction of the Project, the Brevoort Hotel and the Villa Elaine would remain intact, and continue to convey their historic significance. For these reasons, the significance and integrity of the Brevoort Hotel and the Villa Elaine would not be materially impaired by alterations caused by the Project.

Conclusion

Based on visual observation of the subject property, a review of primary and secondary sources, and an analysis of the eligibility criteria for listing in the National Register of Historic Places and the California Register of Historical Resources as well the criteria for local designation as a Los Angeles Historic-Cultural Monument, HRG has evaluated the subject property as it relates to the proposed Project and made the following determinations:

- Due to its comparatively recent construction, the subject property at 1200 North Cahuenga Boulevard does not appear eligible for listing as an individual historic resource in the National Register of Historic Places or the California Register of Historical Resources, or for local designation as a Los Angeles Historic-Cultural Monument. Therefore, the property does not meet the requirements for consideration as an individually eligible historical resource for the purposes of CEQA.

- A review of previous evaluations indicates that there are no historical resources present within the vicinity of the Project Site.

- As no historical resources exist within the boundaries of the Project Site or in the vicinity of the Project Site, the proposed Project does not have the potential to result in significant impacts to historical resources for the purposes of CEQA.

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

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

Less Than Significant Impact. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which meet the criteria for historical resources, as discussed above, or resources which constitute unique archaeological resources. A project-related significant adverse effect could occur if the project were to affect archaeological resources which fall under either of these categories.

The Project Site and surrounding area are not within proximity of a known archaeological site.[85] Furthermore, as discussed above, a records search prepared by the SCCIC (Appendix D) did not reveal any prior evaluations of the property. The SCCIC records search revealed that there have been no recorded archaeological resources within half-mile radius of the of the property (including the Project Site). Nonetheless, should archaeological resources be discovered during grading or construction activities, work would cease in the area of the find until a qualified archaeologist has

85 City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-1 – Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles.

evaluated the find in accordance with federal, State, and local guidelines, including those set forth in Public Resources Code (PRC) Section 21083.2. The required compliance would ensure any found deposits are treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2.

In addition, the City has established a standard condition of approval under its police power and land use authority to address any inadvertent discovery of archaeological resources, and which would be imposed on the Project as part of its land use approvals. In the event that any prehistoric subsurface cultural resources are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the applicant shall notify the City and consult with a qualified archaeologist to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. **Therefore, impacts would be less than significant, and no mitigation measures are required.**

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

Less Than Significant Impact. A significant adverse effect may occur if grading or excavation activities associated with a project were to disturb previously interred human remains. It is unknown whether human remains are located at the Project Site. As the Project Site has been previously developed, any human remains that may have existed near the site surface are likely to have been disturbed or previously removed. Even so, should human remains be encountered unexpectedly during grading or construction activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If human remains of Native American origin are discovered during Project construction, compliance with State laws, which fall within the jurisdiction of the Native American Heritage Commission (PRC Section 5097), relating to the disposition of Native American burials would be required. **Considering the low potential for any human remains to be located on the Project Site and that compliance with regulatory standards described above would ensure appropriate treatment of any human remains unexpectedly encountered during grading activities, the Project's impact on human remains would be less than significant, and no mitigation measures are required.**

VI. ENERGY

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

The following analysis of the potential energy impacts of the Project is based, in part, on the *1200 Cahuenga Project Air Quality, Greenhouse Gas, and Energy Study* (Energy Study), prepared for the Project by MD Acoustics in November 2022, and the *1200 Cahuenga Utility Infrastructure Technical Report: Energy* (Energy Report), prepared for the Project by KPFF Consulting Engineers in December 2022. The Energy Study and Energy Report are included as Appendix A and Appendix E to this IS/MND, respectively, and their findings, conclusions, and recommendations are incorporated by reference herein.

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

Less Than Significant Impact.

Construction

Transportation-Energy

During Project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and vehicles used to deliver materials to the Site. The Project would require demolition and grading, including hauling material offsite; building construction; pavement and asphalt installation; and architectural coating. According to the Project's Energy Study, off-road construction equipment would consume 38,983 gallons of diesel fuel during Project construction.[86] In addition, the Project's Energy Study estimates that on-road construction equipment, such as worker, vendor, and hauling vehicle trips would consume 17,553 gallons of gasoline during Project construction.[87] According to fuel sales data from the California

86 MD Acoustics, 1200 Cahuenga Project Air Quality, Greenhouse Gas, and Energy Study, November 29, 2022, Table 16: Construction Equipment Fuel Consumption Estimates, pages 58-59.

87 MD Acoustics, 1200 Cahuenga Project Air Quality, Greenhouse Gas, and Energy Study, November 29, 2022, Table 17: Construction Worker Fuel Consumption Estimates, page 59; Table 18: Construction Vendor Fuel

Energy Commission, fuel consumption in Los Angeles County was approximately 3.06 billion gallons of gasoline and 445 million gallons of diesel fuel in 2021 (the most recent year of reported data).[88] Accordingly, the Project's transportation-energy consumption during construction would represent a negligible portion of annual gasoline and diesel consumption within Los Angeles County.

Energy use during construction would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. There are no unusual Project characteristics or construction processes proposed that would require the use of equipment that would be more energy intensive and/or less energy efficient than those used for comparable construction projects. In addition, the Project would utilize construction contractors who demonstrate compliance with applicable CARB regulations that restrict the idling of heavy-duty diesel motor vehicles and govern the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Construction activities would utilize fuel-efficient equipment consistent with state and federal regulations and would comply with state measures to reduce the inefficient, wasteful, or unnecessary consumption of energy. In addition, per applicable regulatory requirements, the Project would comply with construction waste management practices to divert construction and demolition debris. These practices would result in efficient use of transportation-energy necessary to construct the Project. Furthermore, in the interest of cost efficiency, construction contractors would not utilize fuel in a manner that is wasteful or unnecessary.

Electricity and Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. In addition, construction of the Project would not require electricity to power most construction equipment as the majority of construction equipment during demolition and grading would be gas- or diesel-powered, with the later construction phases requiring electricity-powered equipment for interior construction and architectural coatings. Overall, the use of electricity would be temporary and would fluctuate according to the phase of construction. Additionally, it is anticipated that most of the electric-powered construction equipment would be hand tools (e.g., power drills, table saws, compressors) and lighting, which would result in minimal electricity usage during construction activities. According to the Project's Energy Study, construction of the Project would consume 44,729 kilowatt-hours (kWh) of electricity. This electrical demand during construction would represent a fraction of the electrical demand during operation, which, as detailed below, would be well within the supply capabilities of the provider. Furthermore, the demand for electricity would be less than the demand associated with the existing uses during their operation.[89]

Consumption Estimates (MHD Trucks), page 60; and Table 19: Construction Hauling Fuel Consumption Estimates (HHD Trucks), page 60. 7,443 gallons (see Table 17) + 4,778 gallons (see Table 18) + 5,312 gallons (see Table 19) = 17,553 gallons.

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

89 KPFF Consulting Engineers, 1200 Cahuenga Utility Infrastructure Technical Report: Energy, December 2022, page 8.

Summary

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

Operation

Transportation-Energy

Transportation-related energy in the form of gasoline and diesel fuel would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips to and from the Project Site by employees and customers. According to the Project's Energy Study, based on CalEEMod trip-type default distances and EMFAC projections for aggregate fuel efficiency of on-road vehicles in 2024, operation of the Project would consume 55,519 gallons of gasoline annually. For comparison purposes, the fuel usage during Project operation would represent 0.002 percent of the projected 2024 annual on-road gasoline-related energy consumption in Los Angeles County.[90]

Trips generated during operation of the Project would be consistent with other similar creative office uses of similar scale and configuration and the Project does not propose uses or operations that would inherently result in excessive vehicle trips. The Project's employees and customers would utilize vehicles that comply with CAFE fuel economy standards and the Pavley standards, which are designed to result in more efficient use of transportation fuels. And as detailed in Checklist Section XVII, Transportation, the Project would not conflict with circulation system plans.

Electricity and Natural Gas

During operation of the Project, electricity and natural gas would be consumed for multiple purposes, including, but not limited to, HVAC, refrigeration, water heating, lighting, and the use of electronics, equipment, and appliances. According to the Project's Energy Report, operation of the Project would consume 922,745 kWh of electricity and 202,454 cubic feet (cf) of natural gas annually.[91] Electricity would be provided to the Project Site by the Los Angeles Department of Water and Power (LADWP), which projects that its total sales in 2024-2025 fiscal year (the Project's operational year) will be 23,286 gigawatt-hours (GWh).[92] Natural gas would be provided to the Project Site by Southern California Gas Company (SoCalGas), which projects that natural gas consumption within SoCalGas' planning area will be approximately 2,327 million cf per day

90 California Air Resources Board, EMFAC2021 on-road vehicle emissions factor model, EMFAC2021 (Modeling input: Los Angeles County; Fleet Aggregate; Annual; 2024). The modeling input values are considered generally representative of conditions for the region and representative of the majority of vehicles associated with Project-related VMT. According to EMFAC2021 modeling, Los Angeles County on-road vehicles will consume 3.67 billion gallons of gasoline in 2024 (i.e., the Project's buildout year).

91 KPFF Consulting Engineers, 1200 Cahuenga Utility Infrastructure Technical Report: Energy, December 2022, Table 3 – Estimated Electricity Demands, page 9; and Table 4 – Estimated Proposed Natural Gas Demand, page 10.

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

in 2024.[93] As such, the Project's electrical demand of 922,745 kWh, or 0.92 GWh, would represent 0.004 percent of LADWP's available supplies. The Project's natural gas demand of 202,454 cf annually (555 cf per day)[94] would represent 0.00002 percent of the natural gas consumption within SoCalGas' area. Furthermore, the Project would replace existing uses that consumed electricity and natural gas when in operation. According to the Project's Energy Report, the Project's electrical demand would result in a net increase at the Project Site of 773,666 kWh, which would represent a similarly negligible percentage of LADWP's available supplies, while its natural gas demand would result in a net *decrease* of 72,941 cf per year, as compared to estimated consumptions during operation of the existing uses.

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

Summary

Based on the above, the Project would not involve the inefficient, wasteful, and unnecessary use of energy during operation. In addition, the consumption of energy resources by the Project would be partially offset by the removal of existing uses, which currently consume energy resources. **Therefore, impacts would be less than significant and no mitigation measures would be required.**

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

Less Than Significant Impact. The energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2019 CALGreen Code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City of LA Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency. With regard to transportation related energy usage, as discussed in greater detail in Checklist Section VIII, Greenhouse Gas Emissions, the Project would not conflict with the goals of the City of Los Angeles Sustainable City pLAn and SCAG's 2020-2045 RTP/SCS, which incorporate VMT targets established by SB 375. The Project's development on an infill Project Site located within a SCAG-designated HQTA and a City-designated TPA that is well-

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

94 202,454 cubic feet per year / 365 days per year = 555 cubic feet per day.

served by public transit provided by Metro and LADOT would serve to reduce VMT and associated fuel consumption within the region. Overall, the Project would be designed and constructed in accordance with applicable state and local green building standards that would serve to reduce the energy demand of the Project. In addition, as discussed above, the demand for electricity and natural gas by the Project would represent a small fraction LADWP's and SoCalGas' projected and planned supplies. Similarly, consumption of petroleum-based fuels would also represent a small fraction of the projected fuel use in Los Angeles County. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. **Impacts would be less than significant and no mitigation measures would be required.**

VII. GEOLOGY AND SOILS

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

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

The following analysis is based on the Geotechnical Engineering Investigation Proposed Adaptive Re-Use Development 1200 through 1210 North Cahuenga Boulevard, 6337 through 6351 West Lexington Avenue, and 6332 through 6356 West La Mirada Avenue, Los Angeles, California Report (Geotechnical Report), prepared by Geotechnologies, Inc., dated September 24, 2021. In addition to the investigations and analyses of the experts who prepared the Geotechnical Report, information, analyses, conclusions and recommendations in the Geotechnical Report are also based on two prior geotechnical engineering reports, as follows:

- A report dated December 17, 2001 prepared by Hakimian Geotechnical Consultants, Inc., submitted for the development of a two-story school building with subterranean parking and a playground area underlain with subterranean parking. The report included four exploratory investigations in the northern and eastern portions of the Project Site and lab testing, and was approved by the City of Los Angeles Department of Building and Safety in the letter dated December 17, 2001 (Log No. 37757); and

- A report dated February 22, 2016 prepared by Irvine Geotechnical, Inc. submitted for a development consisting of interior remodeling and seismic refit of an existing school building. The report included five exploratory test pit excavations in the southwest corner of the Project Site and laboratory testing, and was approved by the City of Los Angeles Department of Building and Safety in the letter dated April 4, 2016 (Log No. 92540).

All specific information on geologic and soils conditions in the discussion below is based on the Geotechnical Report unless otherwise noted. The Geotechnical Report is included as Appendix F of this IS/MND.

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

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

Less Than Significant Impact. A significant impact could occur if a project were located within a State-designated Alquist-Priolo Zone or other designated fault zone, and appropriate building practices were not employed.

Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City of Los Angeles. Based on criteria established by the California Geological Survey, faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Surface rupture of a fault generally occurs within 50 feet of an active fault line when movement on a fault deep within the earth breaks through to the surface. Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement younger than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazards of surface faulting and fault rupture to built structures. The California Geological Survey establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City of Los Angeles designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.[95]

According to the Geotechnical Report, the Project Site is located within the Hollywood Basin. The Hollywood Basin is structurally bound by the Hollywood Fault to the north and the North South Lake Fault to the south. The Hollywood fault is the closest active fault considered capable of surface rupture, and, according to the California Geological Society, the nearest Alquist-Priolo Earthquake Fault Zone is the Hollywood Fault Zone, which is an approximately 6-mile long zone running slightly northeast-southwest through Hollywood along the southern base of the Santa Monica Mountains, and which is located approximately 0.68 mile to the

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

north of the Project Site.[96] [97] However, according to the Geotechnical Report and the City of Los Angeles's General Plan Safety Element, the Project Site is not located within a designated Alquist-Priolo Earthquake Fault Zone or within a City of Los Angeles-designated Fault Rupture Study Area, and no known active faults underlie the Project Site.[98] Therefore, as concluded in the Geotechnical Report, the risk for surface rupture at the Project Site is considered low. Furthermore, while the Project would involve excavation for the new single-level subterranean parking under Building A and for foundations for Buildings A and C, the Project would not involve mining operations or deep excavation into the earth, which could create unstable seismic conditions or stresses. As such, the Project would not exacerbate existing fault rupture conditions and thus, would not exacerbate existing environmental conditions by introducing people or structures into areas potentially susceptible to substantial adverse effects, including fault rupture. **Accordingly, less than significant impacts related to fault rupture would occur under the Project and no mitigation is required.**

ii. Strong seismic ground shaking?

Less Than Significant Impact. A significant impact could occur if a project were to present an increased risk to public safety or destruction of property by exposing people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region.

The Project Site is located in the seismically active Southern California region, which generally experiences moderate to strong ground shaking in the event of an earthquake on a local or regional fault. There are several active faults in the region, including the Hollywood Fault located 1.3 miles to the north, the Newport-Inglewood Fault Zone located 3.3 miles to the southwest, the Santa Monica Fault located 3.7 miles to the west, the Raymond Fault located 6.2 miles to the northeast, and the Verdugo Fault located 7.4 miles to the northeast. The active San Andreas Fault Zone is located approximately 33 miles to the northeast of the Project Site. In addition, several buried thrust faults (those faults without a surface expression) underlie the Los Angeles and are capable of generating significant ground shaking in the Los Angeles Area, including at the Project Site. However, as stated above, no active faults are known to pass directly beneath the Project Site.

The Geotechnical Report (see Appendix F) provided site-specific seismic design parameters based on the uses proposed and soil conditions at the Project Site. The Project would be required through regulatory compliance, including the requirements of LAMC Section 91.7006.2, to incorporate the recommendations of the Project's geotechnical engineer and to comply with any conditions issued by LADBS per their review of the Project's Geotechnical

96 California Department of Conservation, California Geological Survey, Earthquake Zones of Required Investigations Interactive Map Viewer, accessed: January 10, 2022.

97 Geotechnologies, Inc., Geotechnical Report, September 24, 2021.

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

Report, which would account for seismic calculations from probabilistic seismic hazard modeling for the Site.

In addition, the Project would be required to comply with State and local code requirements adopted to ensure that buildings are designed and constructed in a manner that would reduce the substantial risk of collapse, although the buildings may sustain damage during a major earthquake. Specifically, the State and City of Los Angeles mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the City of Los Angeles's General Plan Safety Element, and the Los Angeles Building Code. Pursuant to those laws, the Project would be required to demonstrate compliance with the applicable provisions of these safety requirements before permits could be issued for construction of the Project. Accordingly, the design and construction of the Project would comply with all applicable existing regulatory requirements, the applicable provisions of the Los Angeles Building Code relating to seismic safety, and applicable accepted and proven construction engineering practices.

The Los Angeles Building Code incorporates current seismic design provisions of the 2019 California Building Code, with City of Los Angeles amendments, to minimize seismic impacts. The 2019 California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of the LADBS, including the recommendations provided in a final, site-specific geotechnical report subject to review and approval by the LADBS. As noted above, the Project would not involve mining operations, deep excavations into the earth, or borings of large areas and thus would not exacerbate potential on-site seismic conditions. Therefore, through compliance with statutory and regulatory requirements and site-specific geotechnical recommendations contained in a final design-level geotechnical engineering report, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Nor would the Project exacerbate existing seismically induced ground shaking hazards and thus, would not exacerbate existing environmental conditions by introducing people or structures into areas potentially susceptible to substantial adverse effects, including seismically induced ground shaking hazards. **Impacts related to strong seismic ground shaking would be less than significant, and no mitigation measures are required.**

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. A significant impact could occur if a project were located in an area identified as having a high risk of liquefaction and mitigation measures required within such designated areas were not incorporated into the project. Liquefaction describes a phenomenon where cyclic stresses, which are produced by earthquake-induced ground motions, create excess pore pressures in cohesionless soils. As a result, the soils may acquire a high degree of mobility, which can lead to lateral spreading, consolidation and

settlement of loose sediments, ground oscillation, flow failure, loss of bearing strength, ground fissuring, and sand boils, and other damaging deformations. This phenomenon occurs only below the water table, but after liquefaction has developed, it can propagate upward into overlying, non-saturated soils as excess pore water escapes. The possibility of liquefaction occurring at a given site is dependent upon the occurrence of a significant earthquake in the vicinity, sufficient groundwater to cause high pore pressures, and on the grain size, relative density, and confining pressures of the soil at the site.

The Project Site is not mapped within a State-identified Liquefaction Zone.[99] Based on the historic high groundwater depth (40 feet below the ground surface), a site-specific liquefaction analysis and the groundwater encountered at 27 feet below the ground surface, the Geotechnical Report (Appendix F) concluded that the liquefaction potential at the Project Site is very low.[100]

Additionally, pursuant to LAMC Section 91.7006.2, following approval of the Project, a final geotechnical report for the Project (Final Geotechnical Report) that addresses the same existing soils conditions as well as the final design of the development would be required to be prepared and reviewed and approved by LADBS as part of the City of Los Angeles's ministerial processes of issuing grading and building permits. The Project would be required to incorporate the recommendations of the Final Geotechnical Report and regulatorily required to comply with all conditions issued by LADBS per their review of the Project's Final Geotechnical Report, which would account for underlying soil conditions, including liquefaction potential. Therefore, through compliance with regulatory requirements and site-specific geotechnical recommendations contained in the Final Geotechnical Report, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving liquefaction. Nor would the Project exacerbate existing potential liquefaction hazards and thus, would not exacerbate existing environmental conditions by introducing people or structures into areas potentially susceptible to substantial adverse effects, including liquefaction hazards. **Therefore, impacts related to liquefaction, would be less than significant and no mitigation measures would be required.**

iv. Landslides?

No Impact. A significant adverse effect could occur if a project were located in a hillside area with soil conditions that would suggest a high potential for sliding.

The Project Site and surrounding area consist of relatively flat topography and are not located within an area identified by the State[101] or the City of Los Angeles[102] as having a potential for landslides, or as being within the path of a known landslide. Furthermore, the Project does not propose substantial alterations to the existing topography that would directly or indirectly

99 California Department of Conservation, Geological Survey, Earthquake Zones of Required Investigations Interactive Map Viewer, accessed: January 10, 2022.

100 Geotechnologies, Inc., Geotechnical Report, September 24, 2021.

101 Geotechnologies, Inc., Geotechnical Report, September 24, 2021.

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

cause adverse effects related to landslides. Accordingly, the Geotechnical Report (see Appendix F) concluded that the Project would not be subject to hazards related to landslides and that development of the Project would be feasible from a geotechnical engineering standpoint, provided the advice and recommendations contained in the report are included in the Project plans and are implemented during construction.[103] Therefore, through compliance with regulatory requirements and site-specific geotechnical recommendations contained in the Geotechnical Report, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. **Therefore, no impacts related to landslides would occur, and no mitigation measures would be required.**

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

Less Than Significant Impact. A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time.

Construction of the Project would involve demolition, grading, excavation, and other construction activities that have the potential to disturb existing soils on and underneath the Project Site and to expose these soils to rainfall and wind, thereby potentially resulting in soil erosion. However, due to the temporary nature of the soil exposure during the grading and excavation processes, substantial erosion is unlikely to occur. Further, the potential for substantial soils erosion or loss of topsoil would be reduced by the implementation of standard erosion controls during site preparation and grading activities. Specifically, all grading activities would require grading permits from the LADBS, which would include requirements and standards designed to reduce potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavations, and fills.

The potential for soil erosion during Project operations would be negligible since the Project Site would be fully developed, except for minor amounts of landscaping located throughout the Project Site, and there would be no exposed soil that would be susceptible to erosion. The landscaping would include trees to prevent soil erosion. Furthermore, the Project would be required to comply with the City of Los Angeles's Low Impact Development (LID) ordinance and implement standard erosion controls to limit stormwater runoff, which could otherwise contribute to erosion.

Accordingly, the Project would not have the potential to result in substantial soil erosion or the loss of topsoil. **Therefore, with compliance with applicable regulatory requirements, impacts regarding soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required.**

[103] Geotechnologies, Inc., Geotechnical Report, September 24, 2021.

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

Less Than Significant Impact. A significant impact could occur if a project were built in an unstable area without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. Potential impacts with respect to liquefaction and landslide are evaluated in Questions 6(a)(iii) and (iv) above.

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

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

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. The Project does not propose large scale extraction of groundwater, gas, oil or geothermal energy either at the Project Site or in the general vicinity of the Project Site. Therefore, the Project would create no potential effect related to ground subsidence. Impacts related to subsidence would be less than significant, and no mitigation measures are required.

Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events. According to the Geotechnical Report, the fill soils that underlie the Project Site consist of silty to sandy clay that is dark brown in color, moist, stiff and fine grained, and ranged in thickness between one to three feet.[104] Below the artificial fill is older alluvium and bedrock of the Puente Formation.[105] Due to the type and density of the soils underlying the Project Site, the Project Site soils are not considered collapsible soils.[106] Therefore, the Project Site is not located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in collapse. Impacts associated with collapsible soils would be less than significant, and no mitigation measures are required.

In addition, safe construction practices would be exercised through required compliance with the City of Los Angeles Building Code, the Geotechnical Report's recommendations, and conditions of approval provided by LADBS, which include building foundation requirements appropriate to the site and soil conditions, including soil stability. The Geotechnical Report (see Appendix F) concluded that the Project would not be subject to hazards related to instability, such as

104 Geotechnologies, Inc., Geotechnical Report, September 24, 2021., p. 7
105 Geotechnologies, Inc., Geotechnical Report, September 24, 2021.
106 Geotechnologies, Inc., Geotechnical Report, September 24, 2021.

settlement, slippage, or landslide provided that the recommendations contained in the Geotechnical Report are followed and implemented during design and construction.[107]

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

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

Less Than Significant Impact. A significant impact could occur if a project were built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property.

Expansive soils are typically associated with clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. Subsurface exploration conducted as part of the Geotechnical Report (see Appendix F) determined that the soils beneath the Project Site are artificial fills that were encountered at a depth of one to three feet below the ground surface.[108] The fill soil is underlain by older alluvium and bedrock of the Puente Formation.[109] The fill soil consists of silty to sandy clay which is dark brown in color, moist, stiff and fine grained.

The older alluvium consists of silty to sandy clay, clayey sand, and silty sand to sand with occasional gravel. The older alluvium is dark grayish to reddish brown in color, is moist to wet, medium dense to dense, stiff and fine to medium grained.

The on-site geologic materials are in the very low to moderate expansion range, ranging from 15 to 68 for bulk samples taken from a depth of one to five feet below ground surface. Furthermore, the Project would be required to comply with the City of Los Angeles Uniform Building Code, the Los Angeles Municipal Code, and other applicable building codes which include building foundation requirements appropriate to site-specific conditions, such as expansion potential, established in the Geotechnical Report, and any conditions or recommendations established for the Project by the LADBS during their review of Project plans and the Final Geotechnical Report as part of the building and grading permit approval process (pursuant to LAMC Section 91.7006.2). **Therefore, impacts from expansive soil would be less than significant and no mitigation measures would be required.**

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

No Impact. A significant impact could occur if a project were located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City of Los Angeles that is served by a wastewater collection, conveyance, and treatment system operated by the City

[107] Geotechnologies, Inc., Geotechnical Report, September 24, 2021.
[108] Geotechnologies, Inc., Geotechnical Report, September 24, 2021.
[109] Geotechnologies, Inc., Geotechnical Report, September 24, 2021.

of Los Angeles. Therefore, no septic tanks or alternative disposal systems would be necessary, nor are they proposed. **Accordingly, no impacts related to inadequate septic tank support would occur and no mitigation measures would be required.**

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

Less Than Significant Impact. A significant impact could occur if a project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

The Project is proposed on a Project Site that is located in a developed, urban area and that has been previously been severely disturbed by development, including grading and excavation. Per the General Plan Framework EIR, there are no known paleontological resources within the Project Site.[110] Additionally, a Vertebrate Paleontology Records Check was conducted by the Los Angeles County Natural History Museum for paleontological resources at the Project Site and in its vicinity. The research did not find any recorded paleontological resources within the Project Site boundaries (see Appendix G). The research did find that there are localities of resources near the Project Site from the same sedimentary deposits occurring at depth in the Project Site area.[111] Therefore, as the Project would require excavation for subterranean parking, utility and foundation work, and grading, there would be a potential to encounter buried paleontological resources.

However, the Project would be required to comply with the City of Los Angeles Conservation Element's Site Protection policy regarding the designation of a paleontologist and notification, assessment, and removal or protection of paleontological resources that may be encountered during excavation. Per the Conservation Element, "if significant paleontological resources are uncovered during project execution, authorities are to be notified and the designated paleontologist may order excavations stopped, within reasonable time limits, to enable assessment, removal or protection of the resources."[112] The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. **Therefore, the Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Accordingly, impacts would be less than significant and no mitigation measures would be required.**

110 City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-2, Vertebrate Paleontological Resources in the City of Los Angeles.

111 Correspondence from Samuel A. McLeod, Ph.D., Vertebrate Paleontology, Natural History Museum of Los Angeles County, November 14, 2021.

112 City of Los Angeles, General Plan, Conservation Element, Adopted September 26, 2001, page II-5.

VIII. GREENHOUSE GAS EMISSIONS

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

The following analysis of the potential energy impacts of the Project is based, in part, on the *1200 Cahuenga Project Air Quality, Greenhouse Gas, and Energy Study* (Energy Study), prepared for the Project by MD Acoustics in November 2022 is included as Appendix A to this IS/MND, and its findings, conclusions, and recommendations are incorporated by reference herein.

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

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

Greenhouse gases (GHG) are those gaseous constituents of the atmosphere, both natural and human generated, that absorb and emit radiation at specific wavelengths within the spectrum of terrestrial radiation emitted by the earth's surface, the atmosphere itself, and by clouds. CEQA Guidelines Section 15064.4 addresses a lead agency's determination of the significance of a project's GHG emissions, but does not establish a threshold of significance for such emissions. Instead, Section 15064.4 grants a lead agency the discretion to choose, based on substantial evidence, to determine significance based on quantifying the project's GHG emissions and/or conducting a qualitative analysis or an analysis based on performance standards, and to select the model or methodology the lead agency determines to be most appropriate for each particular project.

Section 15064.4 also directs that a project's GHG emissions should be treated as a cumulative impact and that in determining whether the project's incremental emissions would be cumulatively considerable, the lead agency should consider the project's increase in GHG emissions as compared to the existing setting, how that increase compares to the threshold the lead agency has determined to apply, and the extent to which the project complies with adopted state, regional or local plans for the reduction or mitigation of GHG emissions. CEQA Guidelines Section 15064(h)(3), which addresses cumulative impacts generally, also allows a lead agency to

determine an impact to be less than significant if a project complies with regulatory programs to reduce the project's effects.

Guidelines Section 15064.7 grants lead agencies the discretion to establish significance thresholds for individual projects or adopt them for their respective jurisdictions. In doing so, lead agencies may appropriately look to thresholds, including quantitative, qualitative or performance standards, developed by other public agencies, or suggested by other experts, such as the SCAQMD and the California Air Pollution Control Officer's Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence.

Less Than Significant Impact.

Constituent gases of the Earth's atmosphere, called atmospheric greenhouse gases (GHG), play a critical role in the Earth's radiation amount by trapping infrared radiation emitted from the Earth's surface, which otherwise would have escaped to space. Prominent GHGs contributing to this process include carbon dioxide (CO_2), methane (CH_4), ozone, water vapor, nitrous oxide (N_2O), and chlorofluorocarbons (CFCs). This phenomenon, known as the Greenhouse Effect, is responsible for maintaining a habitable climate. Anthropogenic (caused or produced by humans) emissions of these greenhouse gases in excess of natural ambient concentrations are responsible for the enhancement of the Greenhouse Effect and have led to a trend of unnatural warming of the Earth's natural climate, known as global warming or climate change. Emissions of gases that induce global warming are attributable to human activities associated with industrial/manufacturing, agriculture, utilities, transportation, and residential land uses. Transportation is responsible for 41 percent of the State's greenhouse gas emissions, followed by electricity generation. Emissions of CO_2 and nitrous oxide (NO_X) are byproducts of fossil fuel combustion. Methane, a potent greenhouse gas, results from off-gassing associated with agricultural practices and landfills. Sinks of CO_2, where CO_2 is stored outside of the atmosphere, include uptake by vegetation and dissolution into the ocean. Table 4.7, *Description of Greenhouse Gases* provides a description of each of the greenhouse gases and their global warming potential.

Table 4.7
Description of Greenhouse Gases

Greenhouse Gas	Description and Physical Properties	Sources
Nitrous oxide	Nitrous oxide (N_20),also known as laughing gas is a colorless gas. It has a lifetime of 114 years. Its global warming potential is 298.	Microbial processes in soil and water, fuel combustion, and industrial processes. In addition to agricultural sources, some industrial processes (nylon production, nitric acid production) also emit N_20.
Methane	Methane (CH_4) is a flammable gas and is the main component of natural gas. It has a lifetime of 12 years. Its global warming potential is 25.	A natural source of CH_4 is from the decay of organic matter. Methane is extracted from geological deposits (natural gas fields). Other sources are from the decay of organic material in landfills, fermentation of manure, and cattle farming.

Table 4.7
Description of Greenhouse Gases

Greenhouse Gas	Description and Physical Properties	Sources
Carbon dioxide	Carbon dioxide (CO_2) is an odorless, colorless, natural greenhouse gas. Carbon dioxide's global warming potential is 1. The concentration in 2005 was 379 parts per million (ppm), which is an increase of about 1.4 ppm per year since 1960.	Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources are from burning coal, oil, natural gas, and wood.
Chlorofluorocarbons	CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the earth's surface). They are gases formed synthetically by replacing all hydrogen atoms in methane or methane with chlorine and/or fluorine atoms. Global warming potentials range from 3,800 to 8,100.	Chlorofluorocarbons were synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. They destroy stratospheric ozone, therefore their production was stopped as required by the Montreal Protocol.
Hydrofluorocarbons	Hydrofluorocarbons (HFCs) are a group of greenhouse gases containing carbon, chlorine, and at least one hydrogen atom. Global warming potentials range from 140 to 11,700.	Hydrofluorocarbons are synthetic manmade chemicals used as a substitute for chlorofluorocarbons in applications such as automobile air conditioners and refrigerants.
Perfluorocarbons	Perfluorocarbons (PFCs) have stable molecular structures and only break down by ultraviolet rays about 60 kilometers above the Earth's surface. They have a lifetime 10,000 to 50,000 years. They have a global warming potential range of 6,200 to 9,500.	Two main sources of perfluorocarbons are primary aluminum production and semiconductor manufacturing.
Sulfur hexafluoride	Sulfur hexafluoride (SF_6) is an inorganic, odorless, colorless, and nontoxic, nonflammable gas. It has a lifetime of 3,200 years. It has a high global warming potential, 23,900.	This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

Notes:
[1.] Sources: Intergovernmental Panel on Climate Change 2007a and Intergovernmental Panel on Climate Change 2007b.

City of Los Angeles Green New Deal/Sustainable City pLAn

In 2015, Mayor Eric Garcetti issued the Sustainable City pLAn, a mayoral directive that includes both short-term and long-term aspirations through the year 2035 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others.

In 2019, the first four-year update to the 2015 Sustainable City pLAn was released. This updated document, known as L.A.'s Green New Deal, expands upon the City's vision for a sustainable future and provides accelerated targets and new goals.[113] L.A.'s Green New Deal's specific targets, include ensuring 57 percent of new housing units are built within 1,500 feet of transit by 2025 and 75 percent by 2035; reducing VMT per capita by at least 13 percent by 2025, 39 percent by 2035, and 45 percent by 2050; increasing the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35 percent by 2025 and 50 percent by 2035; supplying 100 percent renewable energy by 2045; installing 10,000 publicly available EV chargers by 2022 and 28,000 by 2028; diverting 100 percent of waste by 2050; and recycling 100 percent of wastewater by 2035.[114]

The City of Los Angeles has not adopted a threshold for GHG emissions.

City of Los Angeles Transportation Assessment Guidelines

The City of Los Angeles Department of Transportation (LADOT) has developed the Transportation Assessment Guidelines (TAG) [July 2019, Updated July 2020] that establish criteria for project review objectives and requirements, and provide instructions and set standards for preparation of transportation assessments in the City of Los Angeles. The most recent TAG conforms to the requirements of SB 743, which directs lead agencies to revise transportation assessment guidelines to include a transportation performance metric that promotes the reduction of GHG emissions, the development of multimodal networks, and access to diverse land uses. In particular, the TAG sets forth VMT thresholds that conform to the mandates and requirements of AB 32, SB 375, and SB743.

Greenhouse Gas Thresholds of Significance

CEQA Guidelines for Greenhouse Gas

The City has determined to adopt the checklist questions set forth in Appendix G of the CEQA Guidelines as thresholds for assessing the significance of a project's potential impacts related to GHG emissions. A significant impact would occur if the project would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

However, despite this, currently neither the CEQA statutes, OPR guidelines, nor the CEQA Guidelines prescribe thresholds of significance or a particular methodology for performing an

113 City of Los Angeles. 2019. L.A.'s Green New Deal, Sustainable City pLAn. Website: https://plan.lamayor.org/. Accessed June 28, 2021.

114 City of Los Angeles. 2019. L.A.'s Green New Deal, Sustainable City pLAn — Targets. Website: https://plan.lamayor.org/targets/targets_plan.html. Accessed June 28, 2021.

impact analysis; as with most environmental topics, significance criteria are left to the judgment and discretion of the Lead Agency.

Although GHG emissions can be quantified, CARB, SCAQMD and the City of Los Angeles have yet to adopt project-level numeric significance thresholds for GHG emissions that would be applicable to the Project. The California Natural Resources Agency has also clarified that the effects of GHG emissions are cumulative impacts, and that they should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see Section 15064(h)(3)).[115] Further, the Governor's Office of Planning and Research's (OPR) technical advisory on CEQA and climate change, the Natural Resources Agency's Final Statement of Reasons, and CEQA Guidelines Section 15064.4 provide that a qualitative analysis of project-level impacts to determine whether a project's GHG impacts are significant can be based on a project's consistency with previously approved plans and mitigation programs, as long as such plans have adequately analyzed and mitigated GHG emissions to a less than significant level.[116] In the absence of any applicable adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. This evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG-related impacts on the environment.

Construction Greenhouse Gas Emissions

The GHG emissions from Project construction equipment and worker vehicles are shown in Table 4.8, *Construction of Greenhouse Gas Emissions*. The emissions result from all phases of construction. The total construction emissions amortized over a period of 30 years are estimated at 17.7 metric tons of CO_2e per year. Annual CalEEMod output calculations are provided in Appendix B.

Table 4.8
Construction Greenhouse Gas Emissions

Activity	Emissions ($MTCO_2e$)[1]		
	Onsite	Offsite	Total

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

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

Demolition	36.1	8.7	44.7
Grading	6.4	51.6	58.0
Paving	306.4	126.9	433.2
Building Construction	10.1	1.0	11.1
Architectural Coating	2.2	0.7	2.8
Total	**361.1**	188.8	549.9
Averaged over 30 years[2]	**12.0**	**6.3**	**18.3**

Notes:
[1.] $MTCO_2e$=metric tons of carbon dioxide equivalents (includes carbon dioxide, methane and nitrous oxide).
[2.] The emissions are averaged over 30 years because the average is added to the operational emissions, pursuant to SCAQMD guidance. See SCAQMD, Draft Guidance Document—Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008, www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf?sfvrsn=2.
** CalEEMod output (Appendix B)*
Source: MD Acoustics, 2022.

Operational Greenhouse Gas Emissions

As shown in Table 4.9, *Project Greenhouse Gas Emissions During Operation (2024)*, the Project's operational GHG emissions total 609.2 metric tons of CO_2e, and the Project's overall GHG emissions including 18.3 metric tons of CO_2e per year to account for amortized construction emissions total 627.5 metric tons of CO_2e per year as shown in Table 4.9.

Table 4.9
Project Greenhouse Gas Emissions During Operation (2024)

Emission Source	Emissions ($MTCO_2e$) with Regulation[1]
Area Source	0.0
Energy Source	159.0
Mobile Source	375.7
Waste	26.1
Water	48.3
Subtotal (Operation)	609.2
Subtotal Construction (averaged over 30 years)	18.3
Total Annual Emissions	**627.5**

Notes:
[1.] $MTCO_2e$ = metric tons of carbon dioxide equivalents
Source: MD Acoustics, 2022.

Greenhouse Gas Plan Consistency

In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as AB 32, into law. AB 32 commits the State to the following:

- By 2010, reduce to 2000 emission levels;
- By 2020, reduce to 1990 levels; and
- By 2050, reduce to 80 percent below 1990 levels.

AB 32 requires that CARB determine what the statewide GHG emissions level was in 1990 and approve a statewide GHG emissions limit that is equivalent to that level, to be achieved by 2020. Executive Order (EO) B-30-15, which was issued in April 2015 by Governor Brown, requires statewide requires GHG emissions to be reduced 40 percent below 1990 levels by 2030. SB 32, signed into law in September 2016, codifies the 2030 GHG reduction target in EO B-30-15. Also, pursuant to AB 32, CARB must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.[117] To achieve these goals, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide Greenhouse Gas (GHG) emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved.

CARB approved a Climate Change Scoping Plan (2008 Scoping Plan) required by AB 32 in 2008.[118] The 2008 Scoping Plan proposes a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health."[119] The First Update to the AB 32 Scoping Plan (First Update), released on May 22, 2014, found that California was on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels squarely in line with those needed to stay on track to reduce emissions to 80 percent below 1990 levels by 2050 if the state realizes the expected benefits of existing policy goals.[120]

In December 2017, CARB adopted the *2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target* (2017 Update).[121] The 2017 Update builds upon the successful framework established by the 2008 Scoping Plan and the First Update while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. The 2017 Update includes policies to require direct GHG reductions at some of the state's largest stationary sources and mobile sources. These policies include the use of lower GHG

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117 California Air Resources Board. AB 32 Global Warming Solutions Act of 2006. ww2.arb.ca.gov/resources/fact-sheets/ab-32-global-warming-solutions-act-2006, accessed August 15, 2021.

118 Climate Change Proposed Scoping Plan was approved by the California Air Resources Board on December 11, 2008.

119 Climate Change Scoping Plan, CARB, December 2008, www.arb.ca.gov/cc/scopingplan/document/scoping plan document.htm, last reviewed April 3, 2013.

120 CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, May 2014, p. 34.

121 CARB, California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017, ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf?utm_medium=email&utm_source=govdelivery.

fuels, efficiency regulations, and the Cap-and-Trade Program, which constraints and reduces emissions at covered sources.[122]

The California Attorney General's Office has taken an active role in addressing climate change in CEQA documents. The Attorney General's Office has created and routinely updates a Fact Sheet listing project design features to reduce greenhouse gas emissions.[123] The Attorney General's Office created the Fact Sheet primarily for the benefit of local agencies processing CEQA documents, noting that "local agencies will help to move the State away from 'business-as-usual' and toward a low-carbon future."[124] The Fact Sheet explains that the listed "measures can be included as design features of a project," but emphasizes that they "should not be considered in isolation, but as part of a larger set of measures that, working together, will reduce greenhouse gas emissions and the effects of global warming."[125]

The Governor's Office of Planning and Research (OPR) recommended Amendments to the CEQA Guidelines for GHGs which were adopted on December 30, 2009. CEQA Guidelines Section 15064.4 was adopted to assist lead agencies in determining the significance of the impacts of GHGs. Consistent with the developing practice, this section of the CEQA Guidelines urges lead agencies to quantify GHG emissions of projects where possible, but also indicates that a that a full "life-cycle" analysis is not required. In addition to quantification, CEQA Guidelines Section 15064.4 recommends consideration of several other qualitative factors that may be used in the determination of significance (i.e., the extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to reduce or mitigate GHGs).

As discussed above, CEQA Guidelines Section 15064 provides that a determination that an impact is not cumulatively considerable may rest on compliance with previously adopted plans or regulations, including plans or regulations for the reduction of GHG emissions. As discussed above, no applicable numeric significance threshold for GHG emissions has been adopted by the State, SCAQMD, or the City of Los Angeles. Although state, regional, and local plans and policies have been adopted to help address climate change (see discussions above), no current law or regulation would regulate all aspects of the Project's GHG emissions. In the absence of any adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project

122 CARB, 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017, p. 6.

123 California Attorney General's Office Fact Sheet, The CEQA—Addressing Global Warming Impacts at the Local Agency Level, revised January 6, 2010.

124 California Attorney General's Office Fact Sheet, The CEQA—Addressing Global Warming Impacts at the Local Agency Level, revised January 6, 2010, http://understandtheplan.info/wp-content/uploads/2014/08/GW_mitigation_measures.pdf.

125 California Attorney General's Office Fact Sheet, The CEQA—Addressing Global Warming Impacts at the local Agency Level, revised January 6, 2010, http://understandtheplan.info/wp-content/uploads/2014/08/GW_mitigation_measures.pdf.

complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

As discussed above, a significant impact would occur if the Project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment by conflicting with applicable regulatory plans and policies to reduce GHG emissions as discussed within CARB's Scoping Plan and subsequent updates, SCAG's 2020–2045 RTP/SCS, and the City's Green New Deal. The analysis below describes the extent to which the Project complies with or exceeds the performance-based standards included in the regulations outlined in these plans. As shown herein, the Project would be consistent with the applicable GHG reduction plans and policies.

CARB's 2008 Climate Change Scoping Plan and Subsequent Updates

The Scoping Plan includes a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a Cap-and-Trade system, and an AB 32 implementation fee to fund the program. The following discussion demonstrates how the pertinent reduction actions relate to and reduce Project-related GHG emissions.

Regulatory Framework

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

- **RPS Program and SB 2X:** The California RPS program (Updated under Senate Bill (SB) 2X) requires both public and investor-owned utilities in California to receive at least 33 percent of their electricity from renewable sources by the year 2020. SB 350 further requires 50 percent renewables by 2030. In 2020, LADWP indicated that 34 percent of its electricity came from renewable resources in Year 2019. The CalEEMod default carbon intensity for electricity generated by LADWP (pounds of CO_2e per MWh) is based on a year 2007 renewables portfolio of 8 percent and was therefore updated within CalEEMod to reflect the year 2026 renewables portfolio. Please note that under recently passed SB 100, LADWP is required to generate electricity that would increase renewable energy resources to 50 percent by 2026, 60 percent by 2030, and 100 percent by 2045. The Project complies with these percentage renewable requirements because the Project is served by LADWP. Electricity GHG emissions included in the total emissions in Table 4.9 conservatively do not account for the additional 50-percent reduction that would be achieved by LADWP in year 2045 (difference between the 50 percent renewables assumed for the buildout year of 2026 and 100 percent required under SB 2X in year 2045). Given LADWP's demonstrated progress towards meeting and exceeding the established targets, as well as potential penalties for non-compliance, it is reasonably assumed that LADWP will comply.

- **SB 350:** As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building

energy efficiency standards under CCR Title 24, Part 6 (discussed below) and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation. The Project would further support this action/strategy because it includes energy-efficient light-emitting diode (LED) lighting as well as Energy Star–labeled appliances for the Project

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

- **Advanced Clean Cars Program:** CARB approved the Advanced Clean Cars Program in 2012 which establishes an emissions control program for model years 2017 through 2025 and increases the number of zero emission vehicles manufactured in the 2018 through 2025 model years.[126] Standards under the Advanced Clean Cars Program apply to all passenger vehicles and light duty trucks within California and indirectly used by employees and deliveries to the Project. Since the CalEEMod model default fleet mix for the SCAB does not yet account for this regulation, the Project's mobile source GHG emissions provided in Table 4.9 are conservative because they could not be adjusted to include this additional 34-percent reduction, even though the Project's emissions would be reduced as a result of this Program. The Project would support this regulation since the Project would comply with the City's EV charging requirements, which specify that 10 percent of new parking spaces would require EV charging equipment.[127] The Project would further support this regulation since the Applicant would provide at least 30 percent of the total parking spaces provided to be capable of supporting future EVSE as dictated.

- **Low Carbon Fuel Standard (LCFS)**: The current LCFS requires a reduction of at least 8.75 percent in the carbon intensity (CI) of California's transportation fuels by 2021.[128] CalEEMod includes implementation of LCFS into the calculation of GHG emissions from mobile sources. However, the LCFS was amended in September 2018 to target a 20-percent reduction in CI from a 2010 baseline by 2030. The CalEEMod model does not take into account the more recent updates to LCFS. The Project's emissions inventory conservatively does not take credit for additional GHG reductions due to the more recent LCFS requirements, but this additional 10-percent reduction in CI would indirectly reduce the Project's mobile source emissions.

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

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

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

- **California Integrated Waste Management Act of 1989:** The regulation requires each jurisdiction's source reduction and recycling element to include a diversion of 50 percent of all solid waste by 2000.[129] AB 341 (2011) amended the regulation to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter.[130] The Project would comply with these percentage recycling requirements inasmuch as the Project is served by the City of Los Angeles, which currently achieves a diversion rate of 76 percent.[131] Project-related GHG emissions from solid waste generation provided in Table 4.9 are conservative as they do not include the 76-percent reduction in solid waste generation source emissions consistent with the minimum diversion rate required for the City of Los Angeles (CalEEMod default diversion rate is zero percent). The Applicant must also only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341.[132] In addition, the Project would provide recycling bins at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. Consistent with CalGreen requirements, the Project would recycle and/or salvage at least 65 percent of non-hazardous construction and demolition debris, and the Applicant would prepare a construction waste management plan that, at a minimum, identifies the materials to be diverted from disposal and whether the materials would be sorted on-site or comingled.[133]

Applicable Scoping Plan Measures

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

- **CCR, Title 24, Building Standards Code:** The 2019 Building Energy Efficiency Standards contained in Title 24, Part 6 (also known as the California Energy Code), requires the design of building shells and building components to conserve energy. The Project would not conflict with the regulatory requirements as the Project must comply with applicable provisions of the 2020 Los Angeles Green Code that, in turn, require compliance with mandatory standards included in the California Green Building Standards such as automatic lighting controls, electric vehicle charging requirements and reduced

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

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

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

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

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

flow rate of plumbing fixtures to conserve water.[134,135] The Project would further support this regulation since the Project would incorporate energy-efficient LED lighting throughout the Project, reducing overall energy usage compared to baseline conditions. In addition, lighting and energy usage for new structures would comply with Title 24 standards.

- **Senate Bill (SB) 375:** SB 375 requires integration of planning processes for transportation, land-use and housing. Under SB 375, each Metropolitan Planning Organization (MPO) would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet a target, created by CARB, for reducing GHG emissions. The Project represents an infill development within an existing urbanized area that would introduce new employment, within an HQTA, consistent with the overall growth pattern encouraged in the RTP/SCS.[136] The Project Site is also well served by public transportation and the Project provides the required short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC. These and other measures would further promote a reduction in VMT and accompanying reduction in GHG emissions. Therefore, the Project would be consistent with SB 375 and the reduction in passenger vehicle GHG emissions provided in the 2016–2040 RTP/SCS. Furthermore, as shown in the Project's VMT analysis, the Project results in a less than significant VMT impact (Overland, 2021). The Project's less than significant VMT would support the goal of the 2020–2045 RTP/SCS to reduce GHG emissions from passenger vehicles.

- **Senate Bill X7-7:** The Water Conservation Act of 2009 set an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The state was required to make incremental progress toward this goal by reducing per-capita water use by at least 10 percent by December 31, 2015. This senate bill was an implementing measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption directly reduces the energy and the associated emissions necessary to convey, treat, and distribute the water; it also reduces emissions from wastewater treatment. The Project would comply with the City of Los Angeles Green Building Code, which requires a 20 percent reduction in water usage.[137]

SCAG 2020–2045 RTP/SCS

The purpose of SB 375 is to implement the State's GHG emissions reduction goals by integrating land use planning with the goal of reducing car and light-duty truck travel. Reflecting that purpose, the primary goal of the 2020–2045 RTP/SCS is to provide a framework for future growth that will decrease per capita GHG emissions from cars and light-duty trucks based on land use planning

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

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

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

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

and transportation options.[138] To accomplish this goal, the 2020–2045 RTP/SCS identifies various strategies to reduce per capita VMT. The 2020–2045 RTP/SCS is expected to help SCAG reach its GHG reduction goals, as identified by CARB, with reductions in per capita passenger vehicle GHG emissions for specified target years.[139]

In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2020–2045 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands.[140] Thus, successful implementation of the 2020–2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use. With regard to individual developments, such as the Project, strategies and policies set forth in the 2020–2045 RTP/SCS can be grouped into the following three categories: (1) reduction of vehicle trips and VMT; (2) increased use of alternative fuel vehicles; and (3) improved energy efficiency.[141] These strategies and policies are addressed below. Also, as explained immediately below, the Project is consistent with applicable growth forecasts.

Consistency with Integrated Growth Forecast

The 2020–2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review.[142] The Project is consistent with the regional growth projections for the Los Angeles Subregion.

Consistency with VMT Reduction Strategies and Policies

The Project is designed and would be constructed to incorporate features to support and promote environmental sustainability. The Project represents an infill development within an existing urbanized area that is well served by public transportation and located adjacent to several Metro bus stops. The Project is estimated to generate less than significant VMT per employee for employees for the area. Additionally, the Project incorporates several TDM measures (e.g., provide required short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC) to reduce the number of single occupancy vehicle trips to the Project Site. Trip generation and VMT were calculated using the LADOT VMT Calculator, which accounts for project features such as increased density and proximity to transit. As shown in the Project's VMT analysis, the Project would result in a less than significant employment VMT impact and

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

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

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

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

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

resultant GHG emissions, which is consistent with the GHG reduction strategies provided in the 2020–2045 RTP/SCS (Overland, 2021). The Project would also be consistent with the following key GHG reduction strategies in SCAG's 2020–2045 RTP/SCS, which are based on changing the region's land use and travel patterns:[143]

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

As discussed above, the Project represents an infill development within an existing urbanized area that would introduce new employment, within an HQTA which is well served by public transportation.[144] Furthermore, the Project VMT per capita would be less than the APC threshold designated for Project area. The Project would also provide required short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC. These and other measures would further promote a reduction in VMT and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2020–2045 RTP/SCS.

Increased Use of Alternative-Fueled Vehicles Policy Initiative

The second goal of the 2020–2045 RTP/SCS, with regard to individual development projects such as the Project, is to increase alternative-fueled vehicles to reduce per capita GHG emissions.[145] The 2020–2045 RTP/SCS policy initiative focuses on providing charge port infrastructure and accelerating fleet conversion to electric or other near zero-emission technologies.[146] The Project would provide at least 30 percent of the total LAMC-required parking spaces provided to be capable of supporting future EVSE and at least 10 percent of the total LAMC-required parking spaces with EV charging stations as dictated by City requirements.

Energy Efficiency Strategies and Policies

The third important goal within the 2020–2045 RTP/SCS for individual developments, such as the Project, involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions.[147] The 2020–2045 RTP/SCS goal is to actively encourage and create incentives for energy efficiency, where possible.[148] As discussed above, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen Code.

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

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

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

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

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

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

[149,150] These standards would reduce energy and water usage and waste and, thereby, reduce associated GHG emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but not limited to; high efficiency dual-flush toilets with a flush volume of 1.28/1.1 gallons per flush, or less, high efficiency hybrid urinals, showerheads with a flow rate of 1.5 gallons per minute or less, and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star–labeled appliances; 500 kW photovoltaic system; and water-efficient landscape design. Furthermore, the Project would provide domestic water heating systems located in close proximity to point(s) of use and individual metering and billing for water use. In addition, the Project would be subject to the 2019 Title 24 standards, which represent "challenging but achievable design and construction practices" that represent "a major step towards meeting the Zero Net Energy (ZNE) goal." Nonresidential buildings built with the 2019 Title 24 standards will use about 30 percent less energy due mainly to lighting upgrades.[151]

Land Use Assumptions

At the regional level, the 2020–2045 RTP/SCS is a plan adopted for the purpose of reducing GHGs.[152] In order to assess the Project's consistency with the 2020–2045 RTP/SCS, this MND also analyzes the Project's land use characteristics for consistency with those utilized by SCAG in its SCS. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as the 2020–2045 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The Project is consistent with the land use goals and principles set forth in the 2020–2045 RTP/SCS that pertain to GHG emissions.

In sum, the Project is the type of land use development that is encouraged by the 2020–2045 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State's long-term climate policies.[153] By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with State regulatory requirements.

City of Los Angeles Green New Deal

L.A.'s Green New Deal, a mayoral initiative, includes both short-term and long-term aspirations through the year 2050 in various topic areas, including: water, renewable energy, energy-efficient

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

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

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

152 As part of the state's mandate to reduce per-capita GHG emissions from automobiles and light trucks, the 2020–2045 RTP/SCS presents strategies and tools that are consistent with local jurisdictions' land use policies and incorporates practices to achieve the state-mandated reductions in GHG emissions at the regional level through reduced per-capita vehicle miles traveled. SCAG 2020–2045 RTP/SCS, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.

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

buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. While not a plan adopted solely to reduce GHG emissions, within L.A.'s Green New Deal, climate change mitigation is one of eight explicit benefits that help define its strategies and goals.

Although L.A.'s Green New Deal mainly targets GHG emissions related to City-owned buildings and operations, certain reductions associated with the Project would promote its goals. Such goals include increasing renewable energy usage, reduction of per capita water usage, promotion of walking and biking to work, promotion of high-density housing close to major transportation stops, and various recycling and trash diversion goals. The Project would generally be consistent with these goals because it is an infill development within an existing urbanized area that would introduce employment within an HQTA which is well served by public transportation. Furthermore, the Project would comply with CALGreen Code, implement various project design features to reduce energy usage and would comply with the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the targets included in L.A.'s Green New Deal with regard to energy-efficient buildings and waste and landfills. The Project would also provide secure short- and long-term bicycle storage areas, showers and changing areas for Project employees and visitors. The Project design would also provide pedestrian access that minimizes barriers and links the Project Site with existing or planned external streets to encourage people to walk instead of drive.

Conclusion

In conclusion, the Project would be consistent with the CARB's Scoping Plan, SCAG's 2020–2045 RTP/SCS and the City's Green New Deal and, therefore, would neither generate GHG emissions that may have a significant impact on the environment nor conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Specifically, the Project would not conflict with the emission reduction measures discussed within CARB's Scoping Plan and subsequent updates, particularly their emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's Scoping Plan and updates, the Project would use "green building" features consistent with the CalGreen Building Code. As discussed above, the Project would generate only a small number of new vehicle trips that would not result in any VMT impacts and would also not conflict with SCAG's 2020–2045 RTP/SCS. Furthermore, as detailed above, the Project would use LED lighting to minimize use of electricity; high efficiency dual-flush toilets with a flush volume of 1.28/1.1 gallons per flush, or less, high efficiency hybrid urinals, showerheads with a flow rate of 1.5 gallons per minute or less, and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star–labeled appliances; 500 kW photovoltaic system; use native and drought-tolerant plant species in the landscaping to minimize water use and would retain existing EV ready and EV-charging stations to assist in the reduction of GHG emissions from vehicles. In addition, the Project would provide domestic water heating systems located in close proximity to point(s) of use and individual metering and billing for water use. As such, the Project would comply with L.A.'s Green New Deal. **In the absence of adopted standards and established**

significance thresholds, and given this consistency analysis, it is concluded that the Project's impacts related to GHG emissions would be less than significant, and no mitigation measures are required.

IX. HAZARDS AND HAZARDOUS MATERIALS

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

The following analysis summarizes and incorporates by reference the information provided in the *Phase I Environmental Site Assessment Stratford School 1200 Cahuenga Boulevard, Los*

Angeles, California 90038 (Phase I ESA),[154] prepared by Partner Engineering and Science, Inc. dated September 24, 2020, and the *Vapor Intrusion Assessment Report 1200 Cahuenga Boulevard, Los Angeles, California* (Vapor Report)[155], prepared by RMD Environmental Solutions, Inc. dated October 12, 2022. The documents are available as Appendix H.1 and Appendix H.2 to this IS/MND.

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

Less Than Significant Impact. A significant impact could occur if a project involved the use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect the public or the environment.

Construction of the Project would involve the temporary transport, use, and disposal of potentially hazardous materials. These materials would include paints, adhesives, surface coatings, cleaning agents, fuels, and oils that are typically associated with development of an urban development project. These materials would be used only temporarily during construction. Additionally, these materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which would further minimize the potential risk associated with them. Construction activities utilizing these materials would be contained on the Project Site. Thus, emissions from the use of such materials would be minimal and localized to the Project Site. Therefore, construction of the Project would not expose persons or the environment to a substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards.

Operation of the Project would not involve the routine use, transport, or disposal of hazardous materials. The Project includes the development of a creative office complex with 500-square-feet of retail and parking. The operation of these typical urban uses would involve only limited hazardous materials similar to those used by any other urban commercial office use such as cleaning solvents, paints, and pesticides for landscaping. As a result, the Project would not produce significant amounts of hazardous waste, or use or transport hazardous waste beyond those materials typically used in an urban commercial office development.

Moreover, by adhering to regulatory requirements for source hazardous waste reduction measures (e.g., recycling of used batteries, recycling of elemental mercury, etc.), the Project would further minimize the generation of hazardous waste. The Project would be required to comply with applicable City of Los Angeles ordinances regarding implementation of hazardous waste reduction efforts on-site (i.e., the City of Los Angeles's Green Building Ordinance). These regulatory requirements further ensure that the minimal amount of hazardous materials associated with the Project are properly treated and disposed of at licensed resource recovery facilities or hazardous waste landfills. The potential transport of any hazardous materials and

154 Partner Engineering and Science, Inc., Phase I Environmental Site Assessment, Stratford School, 1200 Cahuenga Boulevard, Los Angeles, California, 90038, September 24, 2020.

155 RMD Environmental Solutions, Inc., Vapor Intrusion Assessment Report, 1200 Cahuenga Boulevard, Los Angeles, California, October 12, 2022.

wastes, i.e., paints, adhesives, surface coatings, cleaning agents, fuels, and oils, if it occurs, would occur in accordance with the federal and State regulations that govern the handling and transport of such materials. In accordance with such regulations, the transport of hazardous materials and wastes would only occur with transporters that have received training and appropriate licensing. Therefore, operation of the Project would not expose persons or the environment to a substantial risk resulting either from the release of hazardous materials or from exposure to health hazards in excess of regulatory standards. **Therefore, impacts related to the transport, use, and disposal of hazardous materials would be less than significant and no mitigation measures would be required.**

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

Less Than Significant Impact With Mitigation Incorporated. A significant impact could occur if a project could potentially pose a hazard by releasing hazardous materials into the environment through accident or upset conditions.

Recognized Environmental Conditions

As stated above, a Phase I ESA was conducted for the Project Site September 2020 (see Appendix H.1). The purpose of the Phase I ESA was to identify existing or potential recognized environmental conditions (RECs) affecting the Project Site that could indicate the potential for release of hazardous material into the environment.[156] The Phase I ESA also identified the presence of any controlled RECs, historical RECs, and other environmental issues warranting further discussion.[157]

No Controlled RECs or Historical RECs were identified in, on or at the Project Site.[158] However, the Phase I ESA did identify one REC located northeast of the Project Site.[159]The Phase I ESA reported that, according to information obtained from the State Water Resources Control Board (SWRCB) GeoTracker website[160], an open Cleanup Program site identified as Paragon Cleaners, located at 1310 Vine Street (Paragon Site), is situated approximately 750 feet to the northeast

156 A REC is the presence or likely presence of any hazardous substances or petroleum products in, on, or at the property due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment. (Partner Engineering and Science, Inc., Phase I Environmental Site Assessment, Stratford School, 1200 Cahuenga Boulevard, Los Angeles, California, 90038, September 24, 2020, p. ii.)

157 A controlled REC is a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, and a historical REC is a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls. (Partner Engineering and Science, Inc., Phase I Environmental Site Assessment, Stratford School, 1200 Cahuenga Boulevard, Los Angeles, California, 90038, September 24, 2020, p. iii.)

158 Partner Engineering and Science, Inc., Phase I Environmental Site Assessment, Stratford School, 1200 Cahuenga Boulevard, Los Angeles, California, 90038, September 24, 2020.

159 Partner Engineering and Science, Inc., Phase I Environmental Site Assessment, Stratford School, 1200 Cahuenga Boulevard, Los Angeles, California, 90038, September 24, 2020.

160 GeoTracker Website: https://geotracker.waterboards.ca.gov/ accessed September 4, 2020.

and hydrologically upgradient of the Project Site. As of September 22, 2022 the Paragon Cleaners is still designated an open Cleanup Program site.[161] Though the past releases of chlorinated solvents, including tetrachloroethene (PCE), at the Paragon Site have created subsurface groundwater and soil gas effects at the Project Site,[162] based on a review of the most recent groundwater monitoring report (dated July 8, 2020), PCE has migrated in through the groundwater and has impacted the groundwater underlying the Project Site.[163] No groundwater wells are located on the Project Site, but wells are located in the adjoining streets to the north and south of the Project Site. PCE was detected in groundwater samples collected within the La Mirada Avenue right-of-way to the north of the Project Site at concentrations ranging from 210 to 520 µg/L.[164] The highest concentration was detected near the northeastern corner of the Project Site.[165] This groundwater sample also contained cis-1,2 dichloroethane (DCE) at a maximum concentration of 10 µg/L, which above is above the ESL of 6.0 µg/L, but below the residential and commercial Groundwater Vapor Intrusion Human Health Risk Levels (non-cancer hazards) of 49 µg/L and 210 µg/L, respectively.[166]

The Phase I ESA further reported that soil gas samples collected in the La Mirada Avenue right-of-way in 2015 and 2016 also contained concentrations of PCE ranging from 0.15 to 50 µg/L, which exceeds both the residential and commercial soil gas screening levels of 0.015 µg/L and 0.067 µg/L, respectively.[167] Soil gas samples were not collected at the Project Site or to the south or west of the Project Site, however. As such, the downgradient extent of the soil gas impacts to the south and west of La Mirada Avenue were unknown at the time the Phase I ESA was prepared. The soil gas and groundwater contamination is currently being remediated by the responsible party (Paragon Cleaners) via vapor extraction, in-situ chemical reduction (ISCR), and enhanced reductive dichlorination (ERD) with oversight provided by the Los Angeles Regional Water Quality Control Board (LARWQCB).[168] Groundwater monitoring is at the Paragon site and downgradient.[169] Based on the reported presence of elevated soil gas and groundwater impacts in areas adjacent to and upgradient of the Project Site, the Phase I ESA classified the chlorinated solvent release from the Paragon Site as a REC.[170][171] Additionally, the elevated soil gas levels

161 GeoTracker Website: https://geotracker.waterboards.ca.gov/ accessed September 22, 2022.

162 Partner Engineering and Science, Inc., Phase I Environmental Site Assessment, Stratford School, 1200 Cahuenga Boulevard, Los Angeles, California, 90038, September 24, 2020.

163 Ibid.

164 Ibid.

165 Ibid.

166 Partner Engineering and Science, Inc, Joel Redding, Senior Project Manager, correspondence November 21, 2022.

167 Partner Engineering and Science, Inc., Phase I Environmental Site Assessment, Stratford School, 1200 Cahuenga Boulevard, Los Angeles, California, 90038, September 24, 2020.

168 Ibid.

169 Partner Engineering and Science, Inc, Joel Redding, Senior Project Manager, correspondence November 21, 2022.

170 Partner Engineering and Science, Inc., Phase I Environmental Site Assessment, Stratford School, 1200 Cahuenga Boulevard, Los Angeles, California, 90038, September 24, 2020.

171 Partner Engineering and Science, Inc, Joel Redding, Senior Project Manager, correspondence November 21, 2022. It means any VOCs present in groundwater above applicable screening levels, or PCE and whatever cis-1,2-DCA (DCE) is.

identified adjacent to the northern boundary of the Project Site indicate there is an existing vapor encroachment condition at the Project Site.[172]

As recommended in the Phase I ESA, a Vapor Report was prepared. As described in the Vapor Report, in November 24, 2021, eight subslab vapor sampling points (SS-1 through SS-8) were installed throughout the Project Site at various depths, from at-grade to approximately 8 feet below grade.[173] All reported soil vapor concentrations were below the screening level (SLs) with the following exception:

- PCE was reported above the Residential SL of 15 micrograms per cubic meter (µg/m3) in all of the subslab samples at concentrations up to 28,200 µg/m3. Only one sample (SS-1; 40.5 µg/m3) was below the Commercial/Industrial SL of 67 µg/m3. Figure 2 (Appendix H.2) summarizes the analytical results for PCE. Concentrations from deeper subslab points were significantly higher than concentrations collected from the shallower points. These results are expected as volatilization of PCE from groundwater vertically attenuates as the distance from the groundwater table grows.[174]

The DTSC Advisory allows the concentration of the leak check compound (LCC) at 10 times the reporting limit of the target analyte, which is 1.36 µg/m3 for PCE corresponding to an allowable 1,1- difluoroethane (DFA) concentration of 13.6 µg/m3. The values exceed the allowable concentration and indicate potential dilution from atmospheric air during sampling. The results from SS-1 and SS-6 are considered biased low.

As also described in the Vapor Report, in August 2022, seven indoor air samples and two ambient air samples were collected. Three indoor air samples were collected within classrooms on the first floor of the western portion of the Project Site. Four indoor air samples were collected from the subterranean garage on the eastern portion of the Project Site. Samples were collected in accordance with the DTSC Advisory and Guidance.[175]

The indoor air samples were collected from the breathing zone at approximately 3 to 5 feet above the floor. Two ambient air samples were collected to assess outdoor air quality, which could influence and contribute to the air quality within the buildings. The ambient air sample locations were selected based on the findings of the building surveys and the prevailing wind direction. The ambient air samples were located approximately 6 feet above ground surface.

Indoor and ambient air samples were collected over an approximate 8-hour period. The air samples were analyzed for VOCs using USEPA Method TO-15 in selective ion mode (SIM).[176]

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172 Ibid.

173 RMD Environmental Solutions, Inc. Vapor Intrusion Assessment Report 1200 Cahuenga Boulevard, Los Angeles, California, dated October 12, 2022.

174 RMD Environmental Solutions, Inc. Vapor Intrusion Assessment Report 1200 Cahuenga Boulevard, Los Angeles, California, dated October 12, 2022. .

175 RMD Environmental Solutions, Inc. Vapor Intrusion Assessment Report 1200 Cahuenga Boulevard, Los Angeles, California, dated October 12, 2022.

176 RMD Environmental Solutions, Inc. Vapor Intrusion Assessment Report 1200 Cahuenga Boulevard, Los Angeles, California, dated October 12, 2022.

All reported soil vapor concentrations were below the SLs with the following exceptions:[177]

- PCE was reported above the Residential SL of 0.46 µg/m3 and the Commercial/Industrial SL of 2.0 ug/m3 at three indoor air sampling locations inside of the building.

- Other VOCs (benzene, carbon tetrachloride, chloroform, methylene chloride, and naphthalene) were reported above their respective residential SLs in at least one indoor sample collected. Concentrations of these chemicals are not present at significant concentrations in subslab samples and were thus determined to be a result of ambient, background concentrations and/or use of on-site chemical use, such as cleaning products.

As such, the Vapor Report concluded, subslab vapor concentrations of PCE exceed the residential and commercial vapor intrusion SLs due to migration of PCE-impacted groundwater from an upgradient source. These subsurface concentrations result in an exceedance of PCE above Residential and Commercial/Industrial SLs beneath the current building at grade located on the southwestern portion of the Site. Air concentrations in the subterranean garage located on the eastern and northern portions of the Site do not exceed PCE SLs, likely due to the open-air nature of the garage which allows diffusion of PCE.[178]

In accordance with the recommendations of the Vapor Report, the Project incorporates Mitigation Measure **MM HAZ-1**, which requires that a slab penetration survey be conducted within the existing Building B during the future renovation activities in order to identify potential soil gas intrusion pathways, such as through wet and dry utilities slab penetrations, and that any identified potential pathways be sealed, using good engineering practice, as necessary. With incorporation of Mitigation Measure **MM HAZ-1** into the Project, the Project's potential impacts associated with future cancer risk related to indoor air in the renovated building would be reduced to less than significant.

Based on the analysis for future new buildings, the calculated indoor air values would just slightly exceed DTSC cancer risk management criteria. However, the Project incorporates Mitigation Measures **MM HAZ-2** and **MM HAZ-3**, below, for all new commercial structures. With incorporation of Mitigation Measures **MM HAZ-2** and **MM HAZ-3** into the Project, the Project's potential impacts associated with future cancer risk related to indoor air in the new commercial buildings would be less than significant. Based on the above, the Project would not create a significant hazard to the public or the environment through the exacerbation of reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. With the incorporation of Mitigation Measures **MM HAZ-1** through **MM HAZ-3**, below, into the Project, the Project's impacts would be less than significant.

177 RMD Environmental Solutions, Inc. Vapor Intrusion Assessment Report 1200 Cahuenga Boulevard, Los Angeles, California, dated October 12, 2022.

178 RMD Environmental Solutions, Inc. Vapor Intrusion Assessment Report 1200 Cahuenga Boulevard, Los Angeles, California, dated October 12, 2022.

Underground and Aboveground Storage Tanks

The Phase I ESA found no current or former underground or aboveground storage tanks on the Project Site.

Hazards and Methane

The Phase I ESA found no evidence of reportable quantities of hazardous substances on the Project Site. Small quantities of general maintenance supplies were found to be properly labeled and stored at the time of the assessment with no signs of leaks, stains, or spills. The storage and use of maintenance supplies does not appear to pose a significant threat to the environmental integrity of the Project Site. In addition, the Project Site is not located in a methane zone.[179]

Polychlorinated Biphenyls

Typical sources of polychlorinated biphenyls (PCBs) include electrical transformer cooling oils, fluorescent light fixture ballasts, and hydraulic oil. In 1976, the U.S. Environmental Protection Agency (USEPA) banned the manufacture and sale of PCB-containing transformers. Prior to this date, transformers were frequently filled with a dielectric fluid containing PCB-laden oil. Due to their hazardous properties, all aspects of PCBs are strictly regulated by the USEPA under the Toxic Substances Control Act. These regulations ban the manufacture of PCBs although the continued use of existing PCB-containing equipment is allowed. Transformer oil containing PCBs at a concentration exceeding five parts per million is the California-regulated concentration for hazardous waste though PCBs in transformer oil at a concentration up to 50 parts per million are currently allowed in transformers in California. The Toxic Substances Control Act also contains provisions controlling the continued use and disposal of existing PCB-containing equipment.

The buildings on-site were constructed in 1982 and 2005. The Phase I ESA found one pad-mounted transformer on the Project Site. The transformer is not labeled indicating PCB content. No staining or leakage was observed in the vicinity of the transformer. Based on the good condition of the equipment, the transformer is not expected to represent an environmental concern.

The Phase I ESA observed one hydraulic elevator which services the upper floors of Building B. Upon inspection of the elevator rooms, no significant surface staining was observed on the concrete flooring immediately below the elevator equipment. The elevator pit was inaccessible during the site reconnaissance. The elevator is serviced on a monthly basis by Thyssen Krupp Elevator Company. Review of service records in the elevator rooms did not reveal any major incidents with the elevator equipment. Based on the initial development of the Project Site in 1982, the elevator equipment is not suspected to contain PCBs. Based on the age and good condition of the equipment, the elevator equipment is not expected to represent an environmental concern.

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

No other potential PCB-containing equipment (interior transformers, oil-filled switches, hoists, lifts, dock levelers, hydraulic elevators, balers, etc.) was observed on the Project Site during the site reconnaissance. Nevertheless, in the event that PCBs are found within areas proposed for construction, suspect materials would be removed in accordance with all applicable federal, state, and local regulations, such as the Toxic Substances Control Act and California Hazardous Waste Control Law. Therefore, the Project would not exacerbate environmental hazards related to risk of upset or accident conditions associated with exposure of PCBs to the public or environment.

Asbestos-Containing Materials

Asbestos is the name given to a number of naturally occurring, fibrous silicate minerals mined for their useful properties such as thermal insulation, chemical and thermal stability, and high tensile strength. Asbestos was widely used in the building industry starting in the late 1800s and up until the late 1970s for a variety of uses, including acoustic and thermal insulation and fireproofing, and is often found in ceiling and floor tiles, linoleum, pipes, structural beams, and asphalt. Thus, a building, structure, surface asphalt driveway, or parking lot constructed prior to 1979 could contain asbestos or Asbestos Containing Materials (ACMs). Despite its useful qualities, asbestos becomes a hazard if the fibers separate and become airborne. Inhalation of airborne asbestos fibers could cause lung diseases.

The Project Site buildings were constructed in 1982 and 2005. The Phase I ESA noted that, according to a previous Hazardous Materials Assessment conducted at the Project Site in 2015, asbestos was identified in roof penetration mastic on the west wing of the subject building.[180] In the event that ACMs are found on-site during construction, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable regulations, including, inter alia, SCAQMD's Rule 1403. In addition, development of the Project would include the use of commercially sold construction materials that do not contain asbesto4 s or ACMs. With compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment. Therefore, the Project would not exacerbate environmental hazards related to risk of upset or accident conditions associated with the exposure of ACMs to the public or environment.

Lead-Based Paint

Lead is a naturally occurring element and heavy metal that was widely used as a major ingredient in most interior and exterior oil-based paints prior to 1950. Lead compounds continued to be used as corrosion inhibitors, pigments, and drying agents from the early 1950s to 1972, when the Consumer Products Safety Commission specified limits on lead content in such products. The most common paths of lead exposure in humans and adverse health effects are through ingestion and inhalation.

180 Partner Engineering and Science, Inc., Phase I Environmental Site Assessment, Stratford School, 1200 Cahuenga Boulevard, Los Angeles, California, 90038, September 24, 2020.pp. iii, 27.

Due to the date of construction of the existing buildings, 1982 and 2005, it is considered unlikely that lead-based paint (LBP) was utilized on-site.

According to the Phase I ESA, lead was identified in window, gate, and pipe paint, and in red ceramic tiles on the west wing of the building B. The ceramic tile was reportedly removed and abated in 2017.[181] In the event that LBP is found within areas proposed for demolition or renovation, suspect materials would be removed in accordance with procedural requirements and regulations for the proper removal and disposal of LBP prior to construction activities, including standard handling and disposal practices pursuant to OSHA regulations. Example procedural requirements include the use of respiratory protection devices while handling lead-containing materials, containment of lead or materials containing lead on the Project Site or at locations where construction activities are performed, and certification of all consultants and contractors conducting activities involving LBP or lead hazards. Therefore, the Project would not exacerbate environmental hazards related to risk of upset or accident conditions associated with the exposure of LBP to the public or environment.

Based on the above, the Project would not create a significant hazard to the public or the environment through the exacerbation of reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. With the incorporation of Mitigation Measures MM HAZ-1 through MM HAZ-3 below, the Project impacts would be less than significant.

Mitigation Measures

MM HAZ-1: A vapor barrier shall be installed along the base and walls all subterranean garages. The vapor barrier shall be installed to include a sub-slab collection and ventilation system during construction. Based on guidance from the regulatory agency, the vapor barrier shall be operated as an active or passive system.

MM HAZ-2: Ongoing annual monitoring and reporting shall occur after construction and during occupancy to evaluate the efficiency of the vapor barriers and to confirm that indoor air is safe for occupants. Monitoring shall include a combination of indoor air sampling, subslab sampling, and/or differential pressure monitoring. Regulatory oversight, monitoring, and reporting shall be required for 10 years.

MM HAZ-3: All elevators running from the parking lots up into the overlying spaces shall be monitored during occupancy to confirm that indoor air is safe for occupants. Monitoring shall include a combination of indoor air sampling, and/or differential pressure monitoring.

[181] Partner Engineering and Science, Inc., Phase I Environmental Site Assessment, Stratford School, 1200 Cahuenga Boulevard, Los Angeles, California, 90038, September 24, 2020.

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

Less Than Significant Impact. A significant adverse effect could occur if a project site were located within one-quarter mile of an existing or proposed school site and were projected to release toxic emissions which pose a health hazard beyond regulatory thresholds.

The closest school to the Project Site is The Episcopal School of Los Angeles (6325 Santa Monica Boulevard) located 0.2 miles to the southeast of the Project Site. However, as explained above in response to Question IX(a) and Question IX(b), impacts related to handling of or emissions from hazardous materials during construction and operation of the Project would be less than significant due to the Project's compliance with manufacturer recommendations and all federal, state, and local regulations for the storage, use, transport, and disposal of hazardous materials and with the Project's incorporation of Mitigation Measures **MM HAZ-1** through **MM HAZ-3**. Furthermore, the school would be generally shielded from the Project Site due to its distance from the Project Site and the intervening urban buildings, and due to standard construction walls and sheeting that are employed to reduce dust and other emissions from the Site. **As such, impacts related to the emission of hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of a school would be less than significant and no mitigation measures would be required.**

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

Less Than Significant Impact With Mitigation Incorporated. California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if a project site were included on any of the above lists and therefore were to pose an environmental hazard to the public or the environment.

The Phase I ESA (see Appendix H.1) included a search of environmental records published by local, State, tribal, and federal agencies pursuant to Government Code Section 65962.5.

Project Site

The Project Site, identified as Stratford School, Inc., at 1200 N. Cahuenga Boulevard, is listed on the HAZNET and HWTS databases for the generation of other inorganic solid waste in 2016. This waste is presumed to have been associated with on-site chemistry laboratory classes and was manifested for off-site disposal. Based on the one-time hazardous waste generation event and the reported proper off-site removal of the waste, this listing is not considered a REC.

The Project Site, also identified as TCA and TCA Arshag Dickranian at 1200 N. Cahuenga Boulevard, is listed on the HAZNET, HWTS, and FINDS databases for the generation of other inorganic solid waste and laboratory waste chemicals in 2012 and 2013. This waste is presumed to have been associated with on-site chemistry laboratory classes and was manifested for off-site

disposal. Based on the reported proper off-site removal of the waste, this listing is also not considered a REC.

Adjacent Properties

The property identified as Vine New Primary Center at La Mirada Avenue/Cahuenga Boulevard/Lexington Avenue/Cole Avenue, is located adjacent to and to the west of the Project Site, across N. Cahuenga Avenue, in a downgradient direction. This site is listed on the ENVIROSTOR and SCH databases. The status is listed as inactive. These listings are associated with investigations triggered by proposed school uses. It does not appear that the investigation was conducted, resulting in the inactive status. As no investigation appears to have taken place and no documented releases are reported, these listings are not expected to represent an environmental concern.

The property identified as Rucker RB at 1201 Cahuenga Boulevard was formerly located adjacent to the west of the Project Site, across N. Cahuenga Boulevard in a downgradient direction. Sites on the EDR Historic Auto Stations list are identified strictly from review of historic City of Los Angeles directory listings and may or may not have actually operated as a service station or automobile repair shop. Review of other historical sources indicates that gasoline station occupied this property from at least 1938 until circa 1951. No other information was provided. Based on the redevelopment of the site, the absence of documented releases, the distance of the site across N. Cahuenga Boulevard, and the presumed direction of groundwater flow, this listing is not expected to represent an environmental concern.

As discussed above in response to Question IX(b), the property to the northeast of the Project Site, the Paragon Site, is identified as a Cleanup Program – Spills, Leaks, Investigations, Cleanups (CPS-SLIC) site in the regulatory database report. According to information obtained from the State Water Resources Control Board (SWRCB) GeoTracker website, the Paragon Site is located approximately 750 feet to the northeast and hydrologically upgradient of the Project Site. Past releases of chlorinated solvents, including tetrachloroethene (PCE), at this site have resulted in subsurface groundwater and soil gas impacts. Based on review of the most recent groundwater monitoring report (dated July 8, 2020), PCE has migrated in groundwater and has contaminated the groundwater underlying the Project Site. Soil gas samples collected in the La Mirada Avenue right-of-way in 2015 and 2016 contained concentrations of PCE ranging from 0.15 to 50 µg/L, which exceeds both the residential and commercial soil gas screening levels of 0.015 µg/L and 0.067 µg/L, respectively. The soil gas and groundwater contamination are currently being remediated by the responsible party (Paragon Cleaners) via vapor extraction, in-situ chemical reduction (ISCR), and enhanced reductive dichlorination (ERD) with oversight provided by the LA Regional Water Quality Control Board (LA RWQCB). Based on the reported presence of elevated soil gas and groundwater impacts adjacent to and upgradient of the Project Site, the chlorinated solvent release from the Paragon Cleaners site is considered a REC. Additionally, because elevated soil gas impacts were identified adjacent to the north of the Project Site, a vapor encroachment condition exists at the Project Site.

As discussed above in response to Question IX(b), based on the analyses and recommendations in the Phase ESA dated November 2021, the Project has incorporated **MM HAZ-1** through **MM HAZ-3** to reduce soil vapor concentrations and adverse indoor air quality effects at the Project.

Based on the above, with the Project's incorporation of mitigation measures **MM HAZ-1** through **MM HAZ-3**, the Project would not be located on or bring people to a contaminated site and would not thereby create or exacerbate a significant hazard to the public or the environment.

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

Less Than Significant Impact. A significant impact could occur if a project were located within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard.

The Project Site is located approximately 7.1 miles south of the Hollywood-Burbank Airport (2627 N. Hollywood Way). However, the Project Site is not located within the Planning Boundary/Influence Area of the Hollywood-Burbank Airport including within the Runway Protection Zone or Airport Land Use Plan Noise Contour, which establishes the area susceptible to noise levels that would exceed the annoyance threshold for noise (defined as >65 CNEL for commercial airports such as the Hollywood-Burbank Airport).[182] **Accordingly, impacts associated with safety hazards or excessive noise from proximate airports would be less than significant and no mitigation measure would be required.**

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

Less Than Significant Impact. A significant impact could occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan.

Santa Monica Boulevard is identified as a selected disaster route by the City of Los Angeles[183] and as a primary disaster route by Los Angeles County.[184] Construction of the Project would not require road closures and emergency access to the Project Site would be maintained in accordance with the LAMC and the Los Angeles Fire Department (LAFD) requirements. In addition, construction of the Project would not substantially impede public access or travel on public rights-of-way such as Santa Monica Boulevard, and would not interfere with any adopted emergency response plan or emergency evacuation plan.

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182 Los Angeles County, Airport Land Use Commission, Burbank/Glendale/Pasadena Airport, Airport Influence Area Map, May 13, 2003.

183 City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles, Adopted November 1996.

184 Los Angeles County Department of Public Works, Disaster Routes with Roads Districts Map, South Los Angeles County, September 24, 2012.

Additionally, operation of the Project would not permanently alter vehicular circulation routes or patterns, or impede public access or travel upon public rights-of-way. Furthermore, as discussed below under Section XVII, Transportation, the Project would not result in any significant traffic impacts. The Project Site is not located within a Hillside Area[185] and the Project would comply with evacuation requirements according to the LAMC and the LAFD. An emergency response plan would be submitted to the LAFD during review of plans as part of the City of Los Angeles's standard building permit process. **Therefore, impacts to emergency response and evacuation plans would be less than significant and no mitigation measures would be required.**

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

No Impact. A significant impact could occur if a project were located in proximity to wildland areas and were to pose a potential fire hazard, which could expose persons or structures, either directly or indirectly, in the area in the event of a fire.

The Project Site is not located in a Very High Fire Hazard Severity Zone;[186] nor is the Project Site within a wildland fire hazard area.[187] In addition, the Project Site is located in a highly urbanized area of the City of Los Angeles, and does not include wildlands or high fire hazard terrain or vegetation. Furthermore, the Project would be developed in accordance with LAMC and LAFD requirements pertaining to fire safety. **Accordingly, no impacts related to the exposure of people or structures to loss, injury, or death involving wildland fires would occur and no mitigation measures would be required.**

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐

185 City of Los Angeles Department of City Planning, Zone Information & Map Access System Website, accessed: January 2022.

186 City of Los Angeles Department of City Planning, Zone Information & Map Access System Website, accessed: January 2022.

187 City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles, Adopted November 1996.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☒	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

The following analysis summarizes and incorporates by reference the information provided in the *1200 Cahuenga Project Technical Report: Water Resources* (Water Resources Report),[188] prepared by KPFF Consulting Engineers, Inc. dated November 2022. The document is available as Appendix I to this IS/MND.

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

Less Than Significant Impact. A significant impact may occur if a project discharges water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into storm water drainage systems. Significant impacts may also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB).

188 KPFF Consulting Engineers, Inc, 1200 Cahuenga Project Technical Report: Water Resources, dated November 2022.

In general, urban stormwater runoff occurs following precipitation events, with the volume of runoff flowing into the drainage system depending on the intensity and duration of the rain event. Contaminants that may be found in stormwater from developed areas include sediments, trash, bacteria, metals, nutrients, organics and pesticides. The source of contaminants includes surface areas where precipitation falls, as well as the air through which it falls. Contaminants on surfaces such as roads, maintenance areas, parking lots, and buildings, which are usually contained in dry weather conditions, may be carried by rainfall runoff into drainage systems. The City typically installs catch basins with screens to capture debris before entering the storm drain system. In addition, the City conducts routine street cleaning operations, as well as periodic cleaning and maintenance of catch basins, to reduce stormwater pollution within the City.

Construction

Surface Water Quality

Construction activities such as earth moving, maintenance/operation of construction equipment, potential dewatering, and handling/storage/disposal of materials could contribute to pollutant loading in stormwater runoff. During Project construction, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. However, as Project construction would disturb more than 1 acre of soil, the Project would be required to implement a Storm Water Pollution Prevention Plan (SWPPP) under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. In accordance with the requirements of the NPDES Construction General Permit, the Project would prepare and implement a site-specific SWPPP adhering to the California Stormwater Quality Association Best Management Practices (BMP) Handbook. The SWPPP would set forth BMPs for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction. The SWPPP would be carried out in compliance with the requirements of the State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Board, Los Angeles Region (LARWQCB). In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), which include standard erosion control measures and mandate the preparation and implementation of an erosion control plan (Erosion Control Plan) to reduce the effects of sedimentation and erosion in compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. For construction during the rainy season (October 1st to April 14th), the City's grading permit regulations require the implementation of a wet weather erosion control plan that would be prepared pursuant to the "Manual and Guideline for Temporary and Emergency Erosion Control," adopted by the Los Angeles Board of Public Works and incorporated into the City's Development Best Management Practices Handbook, Part A, Construction Activities.[189]

189 LAMC Sections 91.7007.1 and 61.02.

Such requirements would be incorporated into the Project construction SWPPP. Controls for non-stormwater runoff would also be incorporated into the Project's SWPPP.

Dewatering operations are practices that discharge non-stormwater, such as groundwater, from a site and into the drainage system to enable construction to proceed. Discharges from dewatering operations can contain high levels of fine sediments, which if not properly treated, could lead to exceedance of the NPDES requirements. The Project is not expected to require dewatering during construction. Construction activities for the Project would include excavating down approximately 22 feet for subterranean parking, building up the structure, and hardscape and landscape around the structure. Groundwater was encountered during exploration at depths of 25-27 feet below the ground surface, which relates to elevations 286-288 feet.[190] The Seismic Hazard Zone Report by the California Geological Survey indicated the historically highest groundwater level in the area is roughly 40 feet beneath the ground surface.[191] Even so, it is not uncommon for groundwater levels to vary seasonally or for groundwater seepage conditions to develop where none previously existed, especially in impermeable fine-grained soils which are heavily irrigated or after seasonal rainfall. In addition, recent requirements for stormwater infiltration could result in shallower seepage conditions in the immediate site vicinity If groundwater is encountered during construction, temporary pumps and filtration would be required to be utilized in compliance with the NPDES permit. Any such temporary system would be required to comply with all relevant NPDES requirements related to construction and discharges from dewatering operations.

With compliance with the NPDES Permit and implementation of the Erosion Control Plan, site-specific BMPs would reduce or eliminate the discharge of potential pollutants from stormwater runoff. In addition, the Project Applicant would be required to be comply with City grading permit regulations and inspections to reduce sedimentation and erosion. Construction of the Project would not result in discharges that would cause: (1) pollution which would alter the quality of the water of the State (i.e., Ballona Creek) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the water of the State by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes. Furthermore, construction of the Project would not result in discharges that would cause regulatory standards to be violated in the Ballona Creek Watershed. Project construction would not provide substantial additional sources of polluted runoff, nor would it conflict with the implementation of a water quality control plan. In addition, implementation of the Erosion Control Plan would ensure that construction activities would not result in substantial erosion or siltation on- or off-site, or risk release of other pollutants due to inundation. Therefore, temporary construction-related impacts on surface water quality would be less than significant.

190 Geotechnologies, Inc., Geotechnical Report, September 24, 2021.

191 Geotechnologies, Inc., Geotechnical Report, September 24, 2021.

Groundwater Quality

As discussed above, the Project would include excavations for subterranean parking. The Project would also result in a net export of approximately 12,678 cubic yards of soil. Any contaminated soils found would be captured within that volume of excavated material, removed from the Project Site, and remediated at an approved disposal facility in accordance with regulatory requirements.

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

Operation

Surface Water Quality

Under Section 303(d) of the Clean Water Act, states are required to identify water bodies that do not meet their water quality standards. Biennially, the LARWQCB prepares a list of impaired waterbodies and the specific pollutant(s) in the region referred to as the 303(d) list. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL). As discussed in the Water Resources Report, the Project Site lies within the Ballona Creek Watershed. Constituents of concern listed for Ballona Creek under California's Clean Water Act Section 303(d) List include cadmium (sediment), coliform bacteria, copper (dissolved), cyanide, lead, selenium, toxicity, trash, viruses (Enteric), and zinc.[192]

The Project Site would not increase concentrations of the items listed as constituents of concern for the Ballona Creek Watershed but would introduce sources of potential water pollution that are typical of commercial and office uses (e.g., sediment, nutrients, pesticides from runoff from landscaping areas, metals, pathogens, trash and debris, oil and grease). As is typical of most urban developments, stormwater runoff from the Project Site has the potential to introduce

[192] https://www.waterboards.ca.gov/water_issues/programs/tmdl/2010state_ir_reports/category5_report.shtml;

pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project are sediment, nutrients, pesticides, metals, pathogens, and oil and grease.

Stormwater runoff from precipitation events could also potentially carry urban pollutants into municipal storm drains. Under the City's Low Impact Development (LID) Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the greater of a 85th percentile storm event or the first 0.75-inch of stormwater runoff from a storm event (i.e., "first flush"). As discussed in the Water Resources Report, based on site conditions, capture and use would be the most feasible BMP for the Project Site to address these pollutants in accordance with the City's LID Ordinance (Ordinance 183,833) and the City of Los Angeles Planning and Management Handbook for Low Impact Development, Part B, Planning Activities ("LID Manual").[193]

The Project would be required to implement the City's LID standards.[194] Under section 3.1.3. of the LID Manual, post-construction stormwater runoff from a new development must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on-site for at least the volume of water produced by the greater of the 85th percentile storm or the 0.75 inch storm event. The LID Manual prioritizes the selection of BMPs used to comply with stormwater mitigation requirement. The order of priority is:

1. Infiltration Systems
2. Stormwater Capture and Use
3. High Efficient Biofiltration/Bioretention Systems
4. Combination of Any of the Above

Feasibility screening delineated in the LID manual is applied to determine which BMPs will best suit the Project. The historic high groundwater level is approximately 20 feet below the ground surface.[195] Additionally, it is the opinion of the soils engineer that the underlying soils will have poor infiltration capabilities, which would result in a perched water condition. Therefore, the soils engineer has determined that infiltration is infeasible.

Based on the size of the Project Site, the LID system implemented would be required to mitigate 125,290 gallons of runoff generated by the design storm event. Therefore, capture and use would

193 See www.lacitysan.org/cs/groups/sg_sw/documents/document/y250/mde3/~edisp/cnt017152.pdf, last accessed August 11, 2021.

194 The Development Best Management Practices Handbook, Part B Planning Activities, 5th edition was adopted by the City of Los Angeles, Board of Public Works on May 9, 2016 to reflect Low Impact Development (LID) requirements that took effect May 12, 2012.

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

be the BMP implemented and approximately 5,692 square feet of landscaping would be provided to justify the feasibility of a stormwater capture and use system per LID guidelines.

Due to the incorporation of the required LID BMP(s) [196], operation of the Project would not result in discharges that would cause: (1) pollution which would alter the quality of the waters of the State (i.e., Ballona Creek) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the waters of the State by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes.

Therefore, the Project would not have an adverse impact on water quality, and would in fact improve the quality of on-site flows due to the introduction of new BMPs that would collect, treat, and discharge flows from the Project Site (which are not being treated under existing conditions).

Furthermore, operation of the Project would not result in discharges that would cause regulatory standards to be violated. The existing Project Site is approximately 96 percent impervious. The Project will reduce the percentage of impervious surface. Additionally, a portion of the Project Site will be allocated for stormwater BMPs specifically intended to control and treat stormwater runoff in compliance with LID requirements. As stated above, it appears the existing site stormwater runoff is collected in an underground structure near the drive entry off Lexington Avenue prior to discharging to the curb face. The Project would include the installation of LID BMPs, which would mitigate at minimum the first flush or the equivalent of the greater between the 85th percentile storm and first 0.75-inch of rainfall for any storm event. The installed BMP systems will be designed with an internal bypass or overflow system to prevent upstream flooding due to large storm events. The stormwater which bypasses the BMP systems would discharge to an approved discharge point in the public right-of-way. As such, the Project would not interfere with the implementation of a water quality control plan. Therefore, with the implementation of the SWPPP and LID BMPs, there will be no operational impacts on surface water quality.

Groundwater Quality

The Project does not include the installation or operation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility.

Operational activities which could affect groundwater quality include spills of hazardous materials and leaking underground storage tanks. No underground storage tanks are currently operated or anticipated to be operated by the Project. In addition, while the development of new building facilities would slightly increase the use of on-site hazardous materials as described above, compliance with all applicable existing regulations at the Project Site regarding the handling and potentially required cleanup of hazardous materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the

196 https://www.lastormwater.org/wp-content/files_mf/lidmanualfinal.pdf

California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Furthermore, as described above, operation of the Project would not require extraction from the groundwater supply based on the depth of excavation for the proposed uses and the depth of groundwater below the Project Site.

The Project is not anticipated to result in violations of any water quality standards or waste discharge requirements or otherwise substantially degrade groundwater quality. Additionally, the Project does not involve drilling to or through a clean or contaminated aquifer. Thus, the Project's potential impact on groundwater recharge is less than significant.

Conclusion

The Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Less than significant impacts to water quality standards or waste discharge requirements would occur and no mitigation measures would be required.

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

Less Than Significant Impact. A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement or included withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge.

Construction

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste, would reduce the potential for the construction of the Project to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. In addition, as there are no groundwater production wells or public water supply wells within one mile of the Project Site, construction activities would not be anticipated to affect such existing wells. Therefore, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade groundwater quality. As discussed above, groundwater was encountered during exploration at depths of 25-27 feet below the ground surface, which relates to elevations 286-288 feet.[197] The Seismic Hazard Zone Report by the California Geological Survey indicated the historically highest groundwater level in the area is roughly 40 feet beneath the ground surface.[198] However, it is not uncommon for groundwater

197 Geotechnologies, Inc., Geotechnical Report, September 24, 2021.

198 Geotechnologies, Inc., Geotechnical Report, September 24, 2021.

levels to vary seasonally or for groundwater seepage conditions to develop where none previously existed, especially in impermeable fine-grained soils which are heavily irrigated or after seasonal rainfall. In addition, recent requirements for stormwater infiltration could result in shallower seepage conditions in the immediate site vicinity. As discussed above, the Project is not expected to require dewatering during construction. If groundwater is encountered during construction, temporary pumps and filtration would be required to be utilized in compliance with the NPDES permit. Any such temporary system would be required to comply with all relevant NPDES requirements related to construction and discharges from dewatering operations.

As construction activities are not expected to encounter existing groundwater supplies, those activities would not conflict with the implementation of a sustainable groundwater management plan. Therefore, impacts on groundwater quality would be less than significant.

Operation

As stated above in Section X(a), the Project does not include the installation or operation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility. In addition, as there are no groundwater production wells or public water supply wells within one mile of the Project Site, construction activities would not be anticipated to affect such existing wells.

Since the Project would reduce the imperviousness of the Project Site, the Project's potential impact on groundwater recharge is less than significant.

Therefore, the Project would not substantially decrease groundwater supplies in a manner that would impede sustainable groundwater management of the basin. Less than significant impacts to groundwater supplies and recharge would occur and no mitigation measures would be required.

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

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

Less Than Significant Impact. A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of the project.

Generally, the Project Site slopes from north to south approximately 5.5' with the northeast corner being the high point and the southeast corner being the low point. Within the Project Site, there are various area drains and roof downspouts that collect stormwater and direct it to an underground structure located near drive entry at the southern border. It appears overflow from the underground structure discharges to the curb face along the Lexington Avenue frontage. The existing Project Site has been analyzed as 1 drainage area. Table 4.10, *Existing*

Drainage Stormwater Runoff Calculations below shows the existing volumetric flow rate generated by a 50-year storm event.

Table 4.10
Existing Drainage Stormwater Runoff Calculations

Drainage Area	Area (Acres)	Q50 (cfs) (volumetric flow rate measured in cubic feet per second)
DA-1	**1.229**	**3.88**
Total	**1.229**	**3.88**
Source: KPFF 2022.		

Construction

Construction activities for the Project would include demolition of the existing buildings and hardscape surfaces. The deepest portion of excavation is anticipated to be approximately 22 feet below the adjacent grade for subterranean parking. Additionally, the Project will consist of building up of the structure, and constructing hardscape and landscape around the buildings. The mass excavation for the proposed subterranean parking is estimated to generate approximately 12,678 cubic yards of net export. These activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Also, exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff.

However, as discussed above, the Project would be required to implement a SWPPP under the NPDES Construction General Permit and, in accordance with the requirements of the NPDES Permit, would prepare and implement a site-specific SWPPP adhering to the BMP Handbook. The SWPPP would set forth BMPs for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction. The SWPPP would be carried out in compliance with the requirements of the SWRCB and the LARWQCB.

Thus, through mandatory compliance with all NPDES General Construction Permit requirements, mandatory implementation of BMPs, such as perimeter control, vehicle tracking, runoff water sampling, dust control, street sweeping…etc., and mandatory compliance with applicable City grading regulations, the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Therefore, construction-related impacts to surface substantial erosion or siltation on- or off-site would be less than significant.

Operation

The Project would increase the permeability of the site due to an increase LID BMPs that would in planter areas from 4 percent to 10 percent. All building roof drains will be directed to underground drainage devices, which will eliminate the potential for run-off from the site at the surface level. Additionally, all hardscape surfaces will sheet flow toward nearby area drains and be directed to underground drainage devices capable of treated and storing the 85th percentile rain event. (Refer to Figure 7 for illustration of proposed drainage concept in Appendix I of this IS/MND).

Table 4.11, *Proposed Drainage Stormwater Runoff Calculations*, shows the proposed 50-year frequency design storm event peak flow rate within the Project Site. Table 4.12, *Existing and Proposed Drainage Stormwater Runoff Comparison*, shows a comparison of the pre- and post-peak flow rates, and indicates that there would be a decrease in stormwater runoff.

Table 4.11
Proposed Drainage Stormwater Runoff Calculations

Drainage Area	Area (Acres)	Q50 (cfs) (volumetric flow rate measured in cubic feet per second)
DA-1	**1.229**	**3.76**
Total	**1.229**	**3.76**
Source: KPFF 2022.		

Table 4.12
Existing and Proposed Drainage Stormwater Runoff Comparison

Project Site Area (Acres)	Pre-Project Q50 (cfs) (volumetric flow rate measured in cubic feet per second)	Post-Project Q50 (cfs) (volumetric flow rate measured in cubic feet per second)	Incremental Decrease from Existing to Proposed Condition
1.229	**3.88**	**3.76**	**-3.09%**
Source: KPFF 2022.			

Based on site investigations, it appears the existing site stormwater runoff is collected through various site and roof drains and directed to an underground structure located near the drive

entry off Lexington Avenue. The post-Project condition will manage stormwater flow from the building roofs through roof drains. Additionally, the ground level will be graded such that any sheet flow will be directed to site drains. The collected stormwater will be piped underground to a below-grade storage tank located within the central courtyard. Therefore, the Project would not cause flooding during a 50-year storm event or result in a permanent adverse change to the movement of surface water on the Project Site.

As noted above, the Project would not increase the rate or volume of stormwater runoff. In other words, the Project would not substantially reduce or increase the amount of surface water discharged into the existing infrastructure or any waterbody, and would not substantially alter the pattern or quantity of runoff.

The LID requirements for the Project Site would outline the stormwater treatment post-construction BMPs required to control pollutants associated with storm events up to the 85th percentile storm event, per the City's Stormwater Program. The Project BMPs will control stormwater runoff with no increase in runoff resulting from the Project. (Refer to Exhibit 2 for typical LID BMPs in Appendix I of this IS/MND.) The Project would not impact existing storm drain infrastructure serving the Project Site and runoff would continue to follow the same discharge paths and drain to the same stormwater systems.

Therefore, operation-related impacts to surface substantial erosion or siltation on- or off-site would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the project site or nearby properties.

As discussed under Question X(ci), construction activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Also, exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, the Project would be required to comply with the NPDES Construction General Permit requirements and all applicable City grading permit regulations that require necessary approvals, and inspections to reduce sedimentation and erosion. Thus, through mandatory compliance with all NPDES General Construction Permit requirements, mandatory implementation of BMPs, such as perimeter control, vehicle tracking, runoff water sampling, dust control, street sweeping…etc., and mandatory compliance with applicable City grading regulations, the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Therefore, construction-related impacts to surface substantial erosion or siltation on- or off-site would be less than significant.

Additionally, as also discussed under Question X(ci), the Project would not significantly alter the drainage pattern of the Project Site. Furthermore, the Project is unlikely to alter the drainage pattern in a manner that would result in substantial flooding during operation because the Project would be required to comply with the requirements of the LID Ordinance, which result in and require a reduction of the volume of runoff from the Project Site after the Project is constructed. Additionally, because adherence to these regulations and permits would prevent an increase in stormwater flows, and because the Project would not alter offsite water conveyance facilities, no offsite flooding would occur.

Therefore, the Project would not substantially alter the existing drainage pattern of the site or area in a manner that would result in flooding on- or offsite. Impacts related to flooding would be less than significant and no mitigation measures would be required.

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

Less Than Significant Impact. A significant impact may occur if a project would increase the volume of storm water runoff to a level which exceeded the capacity of the storm drain system serving a project site. A project-related significant adverse effect may also occur if a project would substantially increase the probability that polluted runoff would reach the storm drain system.

Construction-Related Project Impacts

As previously discussed, construction activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Also, exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, the Project would be required to comply with the NDPES Construction General Permit requirements and all applicable City grading permit regulations that require necessary approvals, and inspections to reduce sedimentation and erosion. Thus, through mandatory compliance with all NPDES General Construction Permit requirements, mandatory implementation of BMPs, such as perimeter control, vehicle tracking, runoff water sampling, dust control, street sweeping…etc., and mandatory compliance with applicable City grading regulations, the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Therefore, construction-related impacts to runoff water which would not exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff and impacts would be less than significant and no mitigation measures are required.

Operation-Related Project Impacts

The Project will increase the permeability of the site due to an increase in planter areas from 4 percent to 10 percent. All building roof drains will be directed to underground drainage devices, which will eliminate the potential for run-off from the site at the surface level. Additionally, all

hardscape surfaces will sheet flow toward nearby area drains and be directed to underground drainage devices capable of treated and storing the 85th percentile rain event. (Refer to Figure 7 for illustration of proposed drainage concept in Appendix I of this IS/MND).

As stated above, Table 4.11 shows the proposed 50-year frequency design storm event peak flow rate within the Project Site. Table 4.12 shows a comparison of the pre- and post-peak flow rates, and indicates that there would be a decrease in stormwater runoff.

Based on site investigations, it appears the existing site stormwater runoff is collected through various site and roof drains and directed to an underground structure located near the drive entry off Lexington Avenue. The post-Project condition will manage stormwater flow from the building roofs through roof drains. Additionally, the ground level will be graded such that any sheet flow will be directed to site drains. The collected stormwater will be piped underground to a below-grade storage tank located within the central courtyard. Therefore, the Project would not cause flooding during a 50-year storm event or result in a permanent adverse change to the movement of surface water on the Project Site.

As noted above, the Project would not increase the rate or volume of stormwater runoff. In other words, the Project would not substantially reduce or increase the amount of surface water discharged into the existing infrastructure or any waterbody, and would not substantially alter the pattern or quantity of runoff. Therefore, operation-related impacts to runoff water which would not exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff and impacts would be less than significant and no mitigation measures are required.

Conclusion

Therefore, based on the above, the Project would not substantially alter the existing drainage pattern of the site or area in a manner that would create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff during construction or operation. Impacts would be less than significant and no mitigation measures would be required.

iv. Impede or redirect flood flows?

Less Than Significant Impact. A significant impact may occur if a project results in a substantial alteration of flood flows.

According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map, the Project Site is within Zone X, which is a designation for areas determined to have a minimal flood hazard.199 No streams or rivers that may overflow or breech a levee are located on or near the Project Site and the Project Site is not located within any high-risk coastal areas.

199 Federal Emergency Management Agency, Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1605F, effective September 2008.

The City of Los Angeles Safety Element indicates that the Project Site is located within the inundation area boundaries of the Hollywood Reservoir and Mulholland Dam.200 However, this reservoir, as well as others in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum considered earthquake for the site as well as other conditions that could undermine the integrity of the dam. Pursuant to these regulations, the Mulholland Dam is regularly inspected and meets current safety regulations. In addition, the LADWP has emergency response plans to address any potential impacts to its dams. **Given the oversight by the Division of Safety of Dams, including regular inspections, and the LADWP's emergency response program, the potential for substantial adverse impacts related to inundation at the Project Site as a result of dam failure would be less than significant and no mitigation measures would be required.**

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

Less Than Significant Impact. A significant impact may occur if a project site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (seiche and tsunami) or if the project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows.

As discussed in Question X(civ), the Project Site is within Zone X, which is a designation for areas determined to have a minimal flood hazard.[201] Additionally, the Project Site is over 11 miles from the Pacific Ocean and not within an area potentially impacted by a tsunami.[202] There are also no major water bodies in the vicinity of the Project Site that would put the Project Site at risk of inundation by seiche.

As previously discussed, the Los Angeles County General Plan Safety Element indicates that the Project Site is located within the inundation area boundaries of the Mulholland Dam.[203] Inundation of the Project Site resulting from dam failure could release pollutants into surface water should flood waters encounter contaminants at the Project Site. However, the Project proposes commercial uses, which do not represent the type of use that would otherwise degrade water quality (e.g., an industrial land use that could adversely affect water quality). Anticipated and potential pollutants generated by the Project would be limited to those typical of the proposed land uses and include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. These materials would be properly stored and handled as to avoid spilling contents in an area

200 City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, Exhibit G: Inundation and Tsunami Hazard Areas, August 8,1996.

201 Federal Emergency Management Agency, Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1605F, effective September 2008.

202 California Department of Conservation, Los Angeles County Tsunami Inundation Maps, accessed December 2, 2022.

203 City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, Exhibit G: Inundation and Tsunami Hazard Areas, August 8,1996.

that may encounter flood water. **Therefore, the Project would not risk release of pollutants due to inundation. Impacts would be less than significant, and no mitigation measures would be required.**

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

Less Than Significant Impact. A significant water quality impact may occur if a project is not consistent with water quality control plans or sustainable groundwater management plans.

Water quality control plans applicable to the Project include the Los Angeles Regional Water Quality Control Board's (LARWQCB) *Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan) and the City's *Water Quality Compliance Master Plan for Urban Runoff* (Master Plan). Adopted by LARWQCB, the Basin Plan designates beneficial uses for surface and groundwaters, sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's anti-degradation policy, and describes implementation programs to protect all waters in the Los Angeles Region. In addition, the Basin Plan incorporates (by reference) all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. The Master Plan was developed by the Bureau of Sanitation, Watershed Protection Division in collaboration with stakeholders with the primary goal of the Master Plan is to help meet water quality regulations. The Master Plan identifies and describes the various watersheds in the City, summarizes the water quality conditions of the City's waters, identifies known sources of pollutants, describes the governing regulations for water quality, describes the BMPs that are being implemented by the City, discusses existing Total Maximum Daily Loads (TMDL).204

Implementation Plans and Watershed Management Plans

Construction and operation of the Project would involve activities that have the potential to conflict with the water quality goals in the Basin Plan and Master Plan through the spread of contaminants into surface or groundwater supplies. However, as previously detailed, construction activities for the Project would include excavating down approximately 22 feet for subterranean parking, building up the structure, and hardscape and landscape around the structure. Based on the Seismic Hazard Zone Report, the historic high groundwater level in the vicinity of the Project Site is roughly 40 feet below grade. The Project's proposed excavation would not reach this depth; therefore, groundwater is not expected to be encountered during construction that would require either temporary or permanent dewatering operations. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations. Therefore, Project construction would not substantially deplete groundwater supplies in a manner that would result in a net deficit in

204 Total Maximum Daily Load (TMDL) is a regulatory term referring to the maximum amount of a pollutant that a body of water can receive per day while still meeting water quality standards.

aquifer volume or lowering of the local groundwater table and impacts related to groundwater would be less than significant.

As discussed above, the Project would include excavations for subterranean parking. The Project would also result in a net export of approximately 12,678 cubic yards of soil. Any contaminated soils found would be captured within that volume of excavated material, removed from the Project Site, and remediated at an approved disposal facility in accordance with regulatory requirements.

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

While the development of new building facilities would slightly increase the use of on-site hazardous materials (i.e., those typically used on commercially zoned properties such as cleaning, maintenance, and landscaping supplies), compliance with all applicable existing regulations at the Project Site regarding the handling, storage, and potentially required cleanup of hazardous materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated. In addition, operation of the Project would not require direct groundwater extraction either through permanent dewatering or for water supply use.

With regard to groundwater management plans, on September 16, 2014, the State of California signed into law the Sustainable Groundwater Management Act (SGMA). Comprised of three bills, AB 1739, SB 1168, and SB 1319, the SGMA provides a framework for long-term sustainable groundwater management across California and requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under the roadmap laid out by the legislation, local, and regional authorities in medium and high priority groundwater basins have formed Groundwater Sustainability Agencies (GSAs) that will oversee the preparation and implementation of a local Groundwater Sustainability Plan (GSP). Local stakeholders have until 2022 (in critically over drafted basins until 2020) to develop, prepare, and begin implementation of Groundwater

Sustainability Plans. GSAs will have until 2042 (2040 in critically over drafted basins) to achieve groundwater sustainability.

The Project Site is located within the Ballona Creek Watershed (Watershed) in the Los Angeles Basin. The Watershed covers approximately 130 square miles in the coastal plain of the Los Angeles Basin. Its boundaries are the Santa Monica Mountains to the north, the Harbor Freeway (110) to the east, and the Baldwin Hills to the south. The watershed includes the cities of Beverly Hills, West Hollywood, portions of the cities of Los Angeles, Culver City, Inglewood and Santa Monica, unincorporated areas of Los Angeles County, and areas under the jurisdiction of Caltrans.

The watershed is highly developed: residential (64%), industrial (4%), vacant/open space (17%), and commercial (8%) are the predominant land uses. Overall, 49% of the watershed is covered by roads, rooftops and other impervious surfaces.

Ballona Creek flows as an open channel for just under 10 miles from mid-Los Angeles (south of Hancock Park) through Culver City, reaching the Pacific Ocean at Playa del Rey (Marina del Rey Harbor). The Estuary portion (from Centinela Avenue to the outlet) is soft bottomed, while the remainder of the creek is lined in concrete. Ballona Creek is fed by a network of underground storm drains, which reaches north into Beverly Hills and West Hollywood. Major tributaries of the Creek and Estuary include Centinela Creek, Sepulveda Channel, and Benedict Canyon Channel.

The Project would receive its water from the LADWP. Both the LADWP and the California Department of Water Resources have programs in place to monitor wells to prevent overdrafting. The LADWP's groundwater pumping strategy is based on a "safe yield" strategy, in which the amount of water removed over a period of time equals the amount of water entering the groundwater basin through native and imported groundwater recharge. Further, protection from potential overdraft conditions is provided by the court-appointed Los Angeles River Area Watermaster for the San Fernando Basin. LADWP addresses water supply needs through preparation of an Urban Water Management Plan (UWMP), which projects future water use demands and identifies water supplies to meet these demands and is updated every five years.

As described in detail in Question XIX(b), the Project's water demand would be within the projections of the UWMP and the Project would be required to implement water saving features to reduce the amount of water used by the Project in accordance with water conservation measures, including Title 20 and 24 of the California Administrative Code**.** Furthermore, as previously discussed, neither construction nor operation of the Project is anticipated to encounter groundwater, therefore, the extraction of groundwater would not be required. Additionally, the Project would not have the potential to impact the amount of groundwater recharge as the Project Site is entirely impervious and does not currently provide recharge for the groundwater basin.

Accordingly, based on the above, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts to water quality control plans and sustainable groundwater management plans would be less than significant and no mitigation would be required.

XI. LAND USE AND PLANNING

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

a. Physically divide an established community?

Less Than Significant Impact. A significant impact could occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project which involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community).

The Project Site is located at 1200 – 1210 N. Cahuenga Boulevard, 6337 – 6357 W. Lexington Avenue, and 6332 – 6356 W. La Mirada Avenue. The Project Site is bounded by Lexington Avenue to the south, by residential uses and by the commercial uses on Vine Street to the east, by N. Cahuenga Boulevard to the west, and by La Mirada Avenue to the north.

The 53,557 square-foot Project Site is currently developed with the Stratford School which consists of a vacant school building, one recreational field and a basketball court over a below-grade parking garage with an access ramp and two playgrounds. The Project would demolish 8,941 square feet of the two-story, approximately 28,389 square-foot school building, the below-grade parking garage and access ramp topped with the recreation field and basketball court and the two playgrounds. The Project Site does not include any roadways or access to other streets or properties. The Project Site is surrounded by other development and does not contain any existing residences or a residential use that would be physically separated or otherwise disrupted by the Project. Development of the Project would remain within the boundaries of the existing Project Site and would result in further infill of an already developed community. The Project would not disrupt, divide, or isolate an existing neighborhood or community, directly or indirectly, as all proposed improvements would occur within the limits of the Project Site. **Therefore, impacts would be less than significant, and no mitigation measures are required.**

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

Less Than Significant Impact. A significant impact could occur if a project were inconsistent with the General Plan or zoning designations currently applicable to the project site and would

cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate.

The following discussion addresses the Project's consistency with the requirements and policies of the various local plans and regulatory documents that guide development on the Project Site and that were adopted at least in part to avoid or reduce the environmental effects of development, including the following:

- SCAG Regional Transportation Plan (RTP)
- City of Los Angeles General Plan
- Mobility Element 2035
- Citywide Design Guidelines
- Hollywood Community Plan

Consistency with Regional Plans

Southern California Association of Governments (SCAG)/Regional Transportation Plan (RTP)

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal. The 2020-2045 RTP/SCS presents a long-term transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 2020-2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, and the provision of services by other regional agencies. SCAG's overarching strategy for achieving its goals is integrating land use and transportation. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system. Rooted in past RTP/SCS plans, Connect SoCal's "Core Vision" centers on maintaining and better managing the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. The plans "Key Connections" augment the "Core Vision" to address challenges related to the intensification of core planning strategies and increasingly aggressive greenhouse gas reduction goals, and include but are not limited to, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. Connect SoCal intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions' overall quality of life. These benefits include but are not limited to a five percent reduction in vehicle miles traveled (VMT) per capita and vehicle hours traveled by nine percent, increase in work-related transit trips by two percent, create more than 264,500 new jobs, reduce greenfield development by 29 percent, and, building off of the 2020-2045 RTP/SCS, increase the share of new regional household growth occurring in High Quality Transit Areas (HQTA's) by six percent and the share of new job growth in HQTAs by 15 percent.

One of the goals of the 2020-2045 RTP/SCS is improved mobility, accessibility, reliability and travel safety for people and goods. The Project, an infill development within the Hollywood area, would be constructed within an existing urbanized area with an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby transit options that would maximize the potential for mobility and accessibility to the Project for employees and visitors. The availability and accessibility of public transit in the vicinity of the Project Site is documented by the Project Site's location within a SCAG-designated HQTA, and a City of Los Angeles-designated TPA, as defined in the City of Los Angeles's Zoning Information File No. 2452. Furthermore, the Project would intensify development on the Project Site, consistent with the goals of the HQTA and TPZ designations, to place jobs near transit and promote multi-modal transportation over vehicular travel. In addition, the Project would provide bicycle parking spaces for the proposed uses that would serve to promote the use of bicycles. The Project would also include adequate parking to serve the proposed uses and would provide charging stations to serve electric vehicle per LAMC. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and opportunities for walking and biking. Therefore, the Project would not conflict with, and would be consistent with, the applicable objectives of the 2020-2045 RTP/SCS.

Consistency with Local Plans

City of Los Angeles General Plan

The City of Los Angeles's General Plan is a dynamic document consisting of 11 elements, including 10 citywide elements (Air Quality Element, Conservation Element, Historic Preservation and Cultural Resources Element, Housing Element, Infrastructure Systems Element, Noise Element, Open Space Element, Public Facilities and Services Element, Safety Element, and Transportation Element) and the Land Use Element, which provides individual land use consistency plans for each of the City of Los Angeles's 35 Community Plan Areas.

City of Los Angeles General Plan Framework Element

The Framework Element, adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the City of Los Angeles and defines citywide policies regarding land use that influence the Community Plans and most of the City of Los Angeles's General Plan Elements. Specifically, the Framework Element defines citywide policies for land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, and infrastructure and public services.

Land Use Chapter

The Land Use Chapter of the Framework Element provides objectives to support the viability of the City of Los Angeles's residential neighborhoods and commercial and industrial districts and to encourage sustainable growth. The Land Use Chapter establishes the following land use categories, which are described in terms of intensity/density ranges, development heights, and lists of typical land uses: Single-Family Residential, Multifamily Residential, Neighborhood

Districts, Community Centers, Regional Centers, Downtown Center, General Commercial Areas, Mixed-Use Boulevards, Industrial Districts, Transit Stations, Pedestrian-Oriented Districts, and Historic Districts. These land use categories are intended to serve as guidelines for the Community Plans and do not convey land use entitlements or affect existing zoning for properties in the City of Los Angeles. The Project Site designated as being located within a Multiple Family Residential Area.

Housing Chapter

The overarching goal of the Housing Chapter of the Framework Element is to define the distribution of housing opportunities by type and cost for all residents of the City.

Urban Form and Neighborhood Design Chapter

The Urban Form and Neighborhood Design Chapter of the Framework Element establishes a goal of creating a livable City of Los Angeles for existing and future residents. This chapter defines "urban form" as the City of Los Angeles's general pattern of building height, development intensity, activity centers, focal elements, and structural elements, such as natural features, transportation corridors, open space, and public facilities. "Neighborhood design" is defined as the physical character of neighborhoods and communities. The Urban Form and Neighborhood Design Chapter of the Framework Element encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service.

Open Space and Conservation Chapter

The Open Space and Conservation Chapter of the Framework Element contains goals, objectives, and policies to guide the provision, management, and conservation of public open space resources; address the outdoor recreational needs of the City of Los Angeles's residents; and guide amendments to the General Plan Open Space Element and Conservation Element.

Economic Development Chapter

The Economic Development Chapter of the Framework Element seeks to identify physical locations necessary to attract continued economic development and investment to targeted districts and centers. Goals, objectives, and policies include retaining commercial uses, particularly within walking distance of residential areas, promoting business opportunities in areas where growth can be accommodated without encroaching on residential neighborhoods, and retaining industrial land uses on appropriate sites.

Transportation Chapter

The goals of the Transportation Chapter of the Framework Element are to provide adequate accessibility to commerce, work opportunities, and essential services, and to maintain acceptable levels of mobility for all those who live, work, travel, or move goods in the City of Los Angeles. The Transportation Chapter includes proposals for major transportation improvements to enhance the movement of goods and to provide greater access to major intermodal facilities, such as the ports and airports. The goals, objectives, policies, and related implementation programs

of the Transportation Chapter are set forth in the Transportation Element of the General Plan adopted by the City of Los Angeles in September 1999. The City of Los Angeles Council initially adopted Mobility Plan 2035 in August 2015 as an update to the Transportation Element of the General Plan. Mobility Plan 2035 was readopted in January 2016 and again in September 2016. Accordingly, the Transportation Chapter of the Framework Element is now implemented through Mobility Plan 2035, which is discussed below.

Infrastructure and Public Services Chapter

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

The Project's consistency with applicable goals, objectives, and policies in the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below. A detailed list of the goals, objectives, and policies of the Framework Element applicable to the Project is included in Table 4.13, *Applicable Objectives and Policies of the General Plan Framework Element* along with a discussion of whether or not the Project conflicts with that particular goal, objective, or policy. In addition, the Project's consistency with certain economic development goals, objectives, or policies is discussed below, but only for informational purposes. As these economic development goals, objectives, and policies were not adopted for the purpose of avoiding or mitigating an environmental effect, any potential conflict would not be considered to be a significant environmental impact. (CEQA Guidelines Section 15064(e).)

As shown, the Project would be consistent with the applicable policies.

Table 4.13
Applicable Objectives and Policies of the
General Plan Framework Element

Objective/Policy	Would the Project Conflict?
Land Use Chapter	
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	**No conflict.** The Project would replace an existing, vacant private school campus at the Project Site with an approximately 75,262 square-foot creative office campus with ground-floor retail uses, thereby contributing to the diversity of businesses in the area. The Project would be located in close proximity to residential, commercial and transit uses and would

Table 4.13
Applicable Objectives and Policies of the
General Plan Framework Element

Objective/Policy	Would the Project Conflict?
	support those uses by locating potential employees and transit users in an area served by transit and commercial options.
Policy 3.1.1: Identify areas on the Long-Range Land Use Diagram and in the community plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.	**No conflict.** The Project Site is located in a City of Los Angeles-identified TPA. The Project would develop creative office uses in this TPA and expand employment opportunities. Development of creative office uses would serve the needs of existing and future residents in the area by increasing employment in the area. The concentration of development would support the existing range of services and activities in the Project Site's vicinity. With General Plan Amendment and zoning change approval, the Project would be consistent with the Community Plan land use designation of Commercial which includes: retail with Limited Manufacturing, Service Stations and Garages, Retail Business, Churches, Schools, Auto Sales, and R4 Uses such as child care, homeless shelters, and R3 zoning uses such as residential uses.
Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.	**No conflict.** As discussed below in Section XIII. Public Services and Section XVII. Utilities and Service Systems, in this IS/MND, the agencies that provide public infrastructure, services, and utilities to the Project Site would have capacity to serve the Project.
Policy 3.1.3: Identify area for the establishment of new open space opportunities to serve the needs of existing and future residents. These opportunities may include a citywide linear network of parkland sand trails, neighborhood parks and urban open spaces.	**No conflict.** While the Project does not provide any dedicated public parkland, the Project would provide a minimum of 14,667 square feet of open space for employees intended to promote worker well-being and enjoyment in Hollywood. This open space includes the courtyard, terraces, and the decks.
Objective 3.2: To provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.	**No conflict.** The Project would promote an improved quality of life by constructing infill development near several public transit option, which would reduce vehicle trips, vehicle miles traveled, and air pollution. In addition, the Project encourages active transportation by including 22 bicycle parking stalls and bike amenities, such as four showers, and 14 lockers, would be provided in the first level of the parking facility.
Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	**No conflict.** The Project would be located in an area well-served by transit, residential uses, and commercial uses and would encourage bicycle and pedestrian access to these uses. The Project would provide secure bicycle parking to promote cycling.
Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit	**No conflict.** The Project would provide a new creative office use in an urbanized area well-served by transit, and within walking distance of residential and commercial uses. The Project's creative office use

Table 4.13
Applicable Objectives and Policies of the
General Plan Framework Element

Objective/Policy	Would the Project Conflict?
corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	would support the existing range of services and activities within the vicinity of the Project Site.
Policy 3.15.5: Provide for the development of public streetscape improvements, where appropriate.	**No conflict.** The Project would include replacing any sidewalks and the installation of new curbs, gutters, trees, and streetlights, as needed, to accommodate the Project.
Urban Form and Neighborhood Design Chapter	
Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	**No conflict.** The Project would incorporate security features into the Project design to enhance safety. These features include secured access points of entry. In addition, the Project would include security cameras, as well as access control to the building, secured parking facility with key system, and well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of building entrances in high-foot traffic areas.
Open Space and Conservation Chapter	
Policy 6.4.8: Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods. a. Encourage the development of public plazas, forested streets, farmers markets, residential commons, rooftop spaces, and other places that function like open space in urbanized areas of the City with deficiencies of natural open space, especially in targeted growth areas. b. Encourage the improvement of open space, both on public and private property, as opportunities arise. Such places may include the dedication of "unbuildable" areas or sites that may serve as green space, or pathways and connections that may be improved to serve as neighborhood landscape and recreation amenities.	**No conflict.** The Project would provide a minimum of 14,667 square feet of open space for employees intended to promote worker well-being and enjoyment and attract/retain media-focused tenants in Hollywood. This open space includes the courtyard, terraces, and the decks.
Infrastructure and Public Services Chapter	
Policy 9.3.1: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.	**No conflict.** During construction, the Project would obtain coverage under the National Pollutant Discharge Elimination System Construction General Permit and would implement a Stormwater Pollution Prevention Plan that specifies Best Management Practices and erosion control measures to manage runoff flows and prevent pollution. In addition, in accordance with National Pollutant Discharge Elimination System Municipal Permit requirements, the Project would implement Low Impact Development requirements

Table 4.13
Applicable Objectives and Policies of the
General Plan Framework Element

Objective/Policy	Would the Project Conflict?
	throughout the operational life of the Project. Consistent with the City of Los Angeles's Low Impact Development requirement to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of an infiltration system as established by the Low Impact Development Manual.
Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	**No conflict.** The Project would implement Low Impact Development requirements throughout the operational life of the Project.
Objective 9.10: Ensure the water supply, storage, and delivery systems are adequate to support planned development.	**No conflict.** As discussed under Section XVII. Utilities and Service Systems, below, the Project would be within the Los Angeles Department of Water and Power's current and projected available water supplies for normal, single-dry, and multiple-dry years. As such, the LADWP would be able to meet the water demand of the Project, as well as existing and planned future water demands of its service area. Further, the Project would not exceed the available capacity of the distribution infrastructure that would serve the Project Site. Thus, the Project would not require or result in the construction of new water facilities or expansion of existing facilities.
Source: City of Los Angeles, The Citywide General Plan Framework Element, adopted December 11, 1996 and August 8, 2001; EcoTierra Consulting, 2021.	

Mobility Plan 2035

The overarching goal of Mobility Plan 2035 is to achieve a transportation system that balances the needs of all road users. Mobility Plan 2035 incorporates "complete streets" principles. In 2008, the California State Legislature adopted Assembly Bill (AB) 1358, The Complete Streets Act, which requires local jurisdictions to "plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban or urban context." Mobility Plan 2035 includes the following five main goals that define the City of Los Angeles's high-level mobility priorities:

- Safety First;
- World Class Infrastructure;
- Access for All Angelenos;
- Collaboration, Communication, and Informed Choices; and

- Clean Environments and Healthy Communities.

Each of these goals contains objectives and policies to support the achievement of those goals. A detailed list of the goals, objectives, and policies of Mobility Plan 2035 applicable to the Project is included in Table 4.14, *Applicable Policies of the Mobility Plan 2035* along with a discussion of whether or not the Project conflicts with that particular goal, objective, or policy.

Table 4.14
Applicable Policies of the Mobility Plan 2035

Policy	Would the Project Conflict?
Chapter 1: Safety First	
Policy 1.6: Design detour facilities to provide safe passage for all modes of travel during times of construction.	**No conflict.** The Project would prepare and implement a Construction Management Plan to reduce or avoid construction-related impacts on the surrounding community, and would incorporate safety measures around the construction site to reduce or avoid the risk to pedestrian traffic near the work area; minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians; and reduce the use of residential streets and congestion to pubic streets and highways.
Chapter 2: World Class Infrastructure	
Policy 2.6: Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.	**No conflict.** The Project would not modify or interfere with existing bicycle facilities. The Project would enhance bicycle facilities on-site by providing short-term and long-term bicycle spaces in conformance with the City of Los Angeles's Bicycle Ordinance.
Policy 2.10: Facilitate the provision of adequate on and off-street loading areas.	**No conflict.** Vehicular access to the Project Site would be via a two-way entry/ exit driveway on Lexington Avenue and a two-way entry/ exit driveway on La Mirada Avenue. The Project would also include an at-grade on-site drop-off area to serve both rideshare arrivals/departures in the surface parking lot on Lexington Avenue. Therefore, all loading would occur off-street and internally to the Project Site.
Chapter 3: Access for All Angelenos	
Policy 3.1: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes – including goods movement – as integral of the City's transportation system.	**No conflict.** Given the Project Site's location in proximity to a variety of transportation options and the infill nature of the Project, the Project would maximize the potential for mobility and accessibility. The Project would promote the use of bicycles by providing access to short-term and long-term bicycle parking spaces on Site.
Policy 3.3: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.	**No conflict.** The Project would provide a creative office use in an urbanized area well-served by transit, and within walking distance of residential and commercial uses. The office use would support the Project area's existing range of services and activities.
Policy 3.4: Provide all residents, workers, visitors with affordable, efficient, convenient, and attractive transit services.	**No conflict.** The Project Site is located in an area well-served by public transit.

Table 4.14
Applicable Policies of the Mobility Plan 2035

Policy	Would the Project Conflict?
Policy 3.8: Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.	**No conflict.** The Project would provide bicycle parking spaces on-site in accordance with LAMC requirements. The Project would provide 14 long-term bicycle parking spaces and 8 short-term spaces, for a total of 22 bike parking spaces. The bicycle parking spaces would be located on the subterranean parking level under Buildings A and B.
Chapter 5: Clean Environments & Healthy Communities	
Policy 5.2: Support ways to reduce vehicle miles traveled (VMT) per capita.	**No conflict.** The Project supports reductions in VMT by providing a creative office use within walking distance of a well-developed transit system, as well as within numerous retail, dining, and employment opportunities, and thus, provides opportunities for employees to use transportation alternatives to single-occupancy vehicles. In addition, the Project's provision of short- and long-term bicycle parking spaces facilitates travel to and from the Project by bicyclists.
Source: City of Los Angeles, Mobility Plan 2035, September 7, 2017; EcoTierra Consulting, 2021.	

Hollywood Community Plan

The Project Site is located within the Hollywood Community Plan (Community Plan), which was adopted in December 1988. Table 4.15, *Applicable Objectives and Policies of the Hollywood Community Plan*, sets forth the Community Plan's goals and policies for commercial land use and discusses the Project's consistency and applicability with each of them. The Project would not conflict with, and would be consistent with, these goals and policies of the Community Plan for the reasons identified below.

Table 4.15
Applicable Objectives and Policies of the Hollywood Community Plan

Objective and Policies	Would the Project Conflict?
Objective 1. To coordinate the development of Hollywood with that of other parts of the City of Los Angeles and the metropolitan area. To further the development of Hollywood as a major center of population, employment, retail services, and entertainment; and to perpetuate its image as the international center of the motion picture industry.	**No conflict.** The Project would replace an existing, vacant private school campus at the Project Site with an approximately 75,262 square-foot creative office campus with a ground-floor retail use. The Project is providing Creative office space in the Hollywood Community with 14,667 square feet of open space for tenants. This open space would include the courtyard, terraces, and the decks. In addition, the Project would provide 8 short-term and 14 long-term bicycle parking spaces, per LAMC requirements, together with 4 showers and 14 locker facilities. Thus, the Project would promote the use of alternative modes of transportation, including use of public transportation, walking, and bicycling. Furthermore, as shown in Section XIV. Population and Housing, the Project would generate approximately

Table 4.15
Applicable Objectives and Policies of the Hollywood Community Plan

Objective and Policies	Would the Project Conflict?
	301 employees on the Project Site. Thus, furthering employment services in the area.
Objective 5: To provide a basis for the location and programming of public services and utilities and to coordinate the phasing of public facilities with private development. To encourage open space and parks in both local neighborhoods and in high density areas	**No conflict.** The Project would not require the construction of public services facilities, the construction of which would cause significant environmental impacts. In addition, utilities to the Project Site would have capacity to serve the Project. As indicated in Section XVII. Utilities and Service Systems, in this IS/MND, the Project's impacts would be less than significant. Project Site improvements include planting at grade along the facades on La Mirada Avenue, N. Cahuenga Boulevard, and Lexington Avenue as well as on the upper-level terraces, and planting in and near the shared courtyard. Planting along N. Cahuenga Boulevard, along with a shared courtyard between Buildings A, B, and C, would connect the future tenant interior and exterior space. A total of 30 trees would be provided as part of the Project. The Project would also provide 14,419 square feet of landscaping. Landscaping would be added to the courtyard, terraces, decks, and on La Mirada Avenue, N. Cahuenga Boulevard, and Lexington Avenue. As the Project would not include residential units and would not be open to the public, no LAMC code-required open space or recreational space is required. The Project would provide 14,667 square feet of non-required open space for tenants. This open space would include the courtyard, terraces, and the decks which would reduce the potential for additional demand to be placed on public parks and open space areas.
Objective 6: To make provision for a circulation system coordinated with land uses and densities and adequate to accommodate traffic; and to encourage the expansion and improvement of public transportation service.	**No conflict.** While this is a citywide objective, the Project would support its implementation, not conflict with it. Specifically, the Project Site is located in a highly urbanized area and within a designated HQTA and TPA, and is well-served by public transit provided by Metro and LADOT. Furthermore, the Project would provide 8 short-term and 14 long-term bicycle parking spaces, per LAMC requirements, together with showers and locker facilities. Thus, the Project would promote the use of alternative modes of transportation, including use of public transportation, walking, and bicycling.
Objective 7: To encourage the preservation of open space consistent with property rights when privately owned and to promote the preservation of views, natural character and topography of mountainous parts of the Community for the enjoyment of both local	**No conflict.** There is currently no open space on the Project Site and the Project would not conflict with this objective.

Table 4.15
Applicable Objectives and Policies of the Hollywood Community Plan

Objective and Policies	Would the Project Conflict?
residents and persons throughout the Los Angeles region.	
Circulation	
No increase in density shall be effected by zone change or subdivision unless it is determined that the local streets, major and secondary highways, freeways, and public transportation available in the area of the property involved, are adequate to serve the traffic generated.	**No conflict.** The Project would require a Zone and Height District Change and Height District Change as follows: from RD1.5-1XL to C2-1. As discussed in Section XV. Transportation, of this IS/MND, the existing highways and public transportation infrastructure would have adequate capacity to serve the Project.
Service Systems	
No increase in density shall be effected by zone change or subdivision unless it is determined that such facilities are adequate to serve the proposed development.	**No conflict.** The Project would require a Zone and Height District Change and Height District Change as follows: from RD1.5-1XL to C2-1. As discussed in the Public Service and Utilities Sections of this IS/MND, the Project would not result in significant impacts to public services or utilities. In addition, the Project's compliance with regulatory measures, and implementation of project design features, would ensure that public services and utilities would have adequate capacity to serve the Project.
Source: City of Los Angeles, Hollywood Community Plan, December 1988. EcoTierra Consulting, 2021.	

The Project Site is located in the Height District No. 1XL, which restricts the height of development to 30 feet, two stories, and an FAR of 3:1. However, the Project is requesting a General Plan Amendment from Low Medium II Residential to Community Commercial and a Zone and Height District Change to C2-1, which if approved would allow the development of a Creative Office Project with an FAR of approximately 1.41 to 1 and 62 feet in height (to the top of the roof parapet). Thus, approval of the requested entitlements would render the Project consistent with the applicable zoning and height requirements. Further, based on the analysis above, the Project would be substantially consistent with applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site. **Therefore, the Project would not conflict with, and would be consistent with, applicable land use plans adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts would be less than significant; and no mitigation measures are required.**

XII. MINERAL RESOURCES

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

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

No Impact. A significant impact could occur if a project could result in the loss of the availability of a known mineral resource that would be of value to the region and the residents of the State..

The Project Site is fully developed and no oil wells are present.[205][206] No mineral extraction operations currently occur on the Project Site. Additionally, the Project Site is not located within the boundaries of a major oil drilling area or within a State-designated oil field. The State Geologist classifies mineral resource zones (MRZs) within a region based on the following factors:

- MRZ-1: Areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- MRZ-2: Areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.
- MRZ-3: Areas containing mineral deposits for which the significance cannot be determined from available data.
- MRZ-4: Areas where available information is inadequate for assignment of any other MRZ category.

Four major MRZ-2s are identified in, or partially within the unincorporated areas of Los Angeles County: Little Rock Creek Fan, Soledad Production Area, Sun Valley Production Area, and Irwindale Production Area.[207] The Project Site is not located within a mineral resource zone

205 City of Los Angeles Department of City Planning, Zone Information & Map Access System, accessed August 2021.

206 California Department of Conservation, Division of Oil, Gas & Geothermal Resources, Well Finder, accessed August 2021.

207 County of Los Angeles General Plan, Chapter 9: Conservation and Natural Resources Element, 1980, accessed August 2021.

(MRZ-2 zone). The Project would not involve mineral extraction activities, nor are any such activities presently occurring on the Project Site. **Therefore, no impact would occur, and no mitigation measures are required.**

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. A significant impact could occur if a project were located in an area used or available for extraction of a locally important mineral resource extraction and the project converted an existing or potential future locally important mineral extraction use to another use or if the project affected access to a site used or potentially available for locally-important mineral resource extraction.

As discussed above under responses to Checklist Question XII(a), the Project Site is not within a major drilling area or State-designated oil field, or within an MRZ-2 zone. The Project would not affect any extraction activities and there would be no impact on existing or future regionally important mineral extraction sites. Therefore, development of the Project would not result in the loss of availability of a locally-important mineral resource, or mineral resource recovery site, as delineated on a local general plan, specific plan, or land use plan. **Therefore, no impact would occur, and no mitigation measures are required.**

XIII. NOISE

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

The following analysis summarizes and incorporates by reference the information provided in the *Noise Impact Study ,1200 Cahuenga Project, Los Angeles, CA* (Noise Study), prepared by Acoustical Engineering Services, Inc. dated December 2022. The document is available as Appendix J to this IS/MND.

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

Less Than Significant With Mitigation Incorporated. A significant impact may occur if the project would generate excess noise that would cause the ambient noise environment at the Project Site to fail to comply with noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance) (Section 111.00 through Section 116.01 of the LAMC). Implementation of the Project would result in an increase in ambient noise levels during both construction and operations, as discussed in detail below.

Regulatory Setting

To limit population exposure to physically and/or psychologically damaging as well as intrusive noise levels, the federal government, the State of California, various county governments, and most municipalities in the state have established standards and ordinances to control noise. In most areas, automobile and truck traffic is the major source of environmental noise. Traffic activity generally produces an average sound level that remains constant with time. Air and rail traffic, and commercial and industrial activities are also major sources of noise in some areas. Federal, state, and local agencies regulate different aspects of environmental noise. Federal and state agencies generally set noise standards for mobile sources such as aircraft and motor vehicles, while regulation of stationary sources is left to local agencies.

State of California Noise Requirements

The State of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards and provides guidance for local land use compatibility. State law requires that each county and city adopt a General Plan that includes a Noise Element which is to be prepared per guidelines adopted by the Governor's Office of Planning and Research. The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. In addition, CEQA requires that all known environmental effects of a project be analyzed, including the potential environmental noise impacts.

State of California Building Code

The State of California's noise insulation standards are codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 2, and the California Building Code. These noise standards are applied to new construction in California for controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are developed near major transportation noise sources, and where such noise sources

create an exterior noise level of 60 decibels (dBA) CNEL or higher. Acoustical studies that accompany building plans for noise-sensitive land uses must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL.

City of Los Angeles General Plan Noise Element

The City of Los Angeles has adopted a Noise Element of the General Plan to identify goals, objectives, and policies for managing noise issues within the City. The following goal and objectives are identified in the General Plan Noise Element:

1. Objective 2 (Non-airport): Reduce or eliminate non-airport related intrusive noise, especially relative to noise-sensitive uses.

2. Policy 2.1: Enforce and/or implement applicable City, State, and federal regulations intended to mitigate proposed noise producing activities, reduce intrusive noise and alleviate noise that is deemed a public nuisance.

3. Objective 3 (Land Use Development): Reduce or eliminate noise impacts associated with proposed development of land and changes in land use.

4. Policy 3.1: Develop land use policies and programs that will reduce or eliminate potential and existing noise impacts.

Table 4.16 below provides the exterior noise standard associated with various land uses, as provided in the City's Noise Element. According to the City, an exterior noise environment up to 70 dBA CNEL is "conditionally acceptable" for noise sensitive uses (e.g., residential, hotel, school). In addition, noise levels up to 75 dBA CNEL are "normally unacceptable", while noise levels at 75 dBA CNEL and above are "clearly unacceptable" for residential.

Table 4.16
City of Los Angeles Noise Land Use Compatibility

Land Use	Day-Night Average Exterior Sound Level (CNEL dBA)						
	50	55	60	65	70	75	80
Residential Single Family, Duplex, Mobile Home	A	C	C	C	N	In the	In the
Residential Multi-Family	A	A	C	C	N	In the	In the
Transient Lodging, Motel, Hotel	A	A	C	C	N	In the	In the
School, Library, Church, Hospital, Nursing Home	A	A	C	C	N	N	In the
Auditorium, Concert Hall, Amphitheater	C	C	C	C/N	In the	In the	In the
Sports Arena, Outdoor Spectator Sports	C	C	C	C	C/U	In the	In the
Playground, Neighborhood Park	A	A	A	A/N	N	N/U	In the
Golf Course, Riding Stable, Water Recreation, Cemetery	A	A	A	A	N	A/N	In the
Office Building, Business, Commercial, Professional	A	A	A	A/C	C	C/N	N
Agriculture, Industrial, Manufacturing, Utilities	A	A	A	A	A/C	C/N	N

[1] *Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.*

[2] *Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.*

[3] *Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.*

[4] *Clearly Unacceptable: New construction or development should generally not be undertaken.*

Source: City of Los Angeles, General Plan Noise Element, adopted February 1999.

City of Los Angeles Municipal Code

Chapter XI, Noise Regulation, of the LAMC (referred to herein as the Noise Regulations) establishes acceptable ambient sound levels and is intended to regulate intrusive noises (e.g., stationary mechanical equipment and vehicles other than those traveling on public streets) within specific land use zones and to provide procedures and criteria for the measurement of the sound level of noise sources. These procedures recognize and account for differences in the perceived level of different types of noise and/or noise sources. In accordance with the Noise Regulations, a noise level increase from certain regulated noise sources of 5 dBA over the existing or presumed ambient noise level at an adjacent property line is considered a violation of the Noise Regulations.

The 5-dBA increase above ambient is applicable to City- regulated noise sources (e.g., mechanical equipment), and is applicable any time of the day.[208]

The Noise Regulations state that the baseline ambient noise environment shall be the actual measured ambient noise level or the City's presumed ambient noise level, whichever is greater. The actual ambient noise level is the measured noise level averaged over a period of at least 15 minutes, L_{eq} (15-minute). The Noise Regulations state that in cases where the actual measured ambient conditions are not known, the City's presumed daytime (7:00 A.M. to 10:00 P.M.) and nighttime (10:00 P.M. to 7:00 A.M.) ambient noise levels defined in Section 111.03 of the LAMC should be used. The City's presumed ambient noise levels for specific land use zones, as set forth in LAMC Section 111.03, are provided in Table 4.17, *City of Los Angeles Presumes Ambient Noise Levels*.

Table 4.17
City of Los Angeles Presumed Ambient Noise Levels

Zone	Daytime(7:00 A.M. to 10:00 P.M.)dBA (L_{eq})	Nighttime(10:00 P.M. to 7:00 A.M.)dBA (L_{eq})
Residential, School, Hospitals, Hotels	50	40
Commercial	60	55
Manufacturing (M1, MR1, and MR2)	60	55
Heavy Manufacturing (M2 and M3)	65	65
Source: LAMC Section 111.03.		

The Noise Regulations also address off-road vehicle-related noise, including in Section 114.02, which prohibits the operation of any motor-driven vehicles upon any property within the City in a manner that would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than 5 dBA, and in Section 114.06, which requires that vehicle theft alarm systems be silenced within five minutes.

In addition, the Noise Regulations (LAMC Section 112.05) set a maximum noise level from construction equipment (powered equipment or powered hand tools) operating between the hours of 7:00 A.M. and 10:00 P.M., in any residential zone of the City or within 500 feet thereof, of 75 dBA, measured at a distance of 50 feet from the source, unless compliance with this limitation is technically infeasible. Section 41.40 of the LAMC prohibits construction noise that disturbs persons occupying sleeping quarters in any dwelling, hotel, or apartment or other place of residence between the hours of 9:00[209] P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. and after 6:00 P.M. on Saturday or national holiday, and at any time on Sunday. Construction

208 Los Angeles Municipal Code, Chapter XI, Section 112.02. CHAPTER XI NOISE REGULATION (amlegal.com)

209 In accordance with the Noise Regulations (LAMC Chapter XI, Section 112.05), "technically feasible" means that the established noise limitations can be complied with at a project site, with the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques employed during the operation of equipment.

hours may be extended with approval from the Executive Director of the Board of Police Commissioners.

Applicable Vibration Standards

The City currently does not have any adopted standards, guidelines, or criteria relative to ground-borne vibration. As such, available guidelines from the Federal Transit Administration (FTA) are utilized in this report to assess the Project's potential impacts due to ground-borne vibration. The FTA has published a technical manual titled, "Transit Noise and Vibration Impacts Assessment," that provides ground-borne vibration impact criteria related to building damage during construction activities. [210]Table 4.18, *FTA Construction Vibration Impact Criteria for Building Damage*, provides those vibration impact criteria (based on FTA) applicable to building category. According to FTA guidelines and as shown in Table 4.18, a vibration level of 0.30 PPV should be used as the threshold indicating a significant structural damage impact for engineered concrete and masonry buildings, and a vibration level of 0.50 PPV should be used as the threshold indicating a significant structural damage impact to structures or buildings constructed of reinforced concrete, steel, or timber.

Table 4.18
FTA Construction Vibration Impact Criteria for Building Damage

Building Category	Peak Particle Velocity (PPV), (in/sec)
I. Reinforced concrete, steel or timber (no plaster)	0.50
II. Engineered concrete and masonry (no plaster)	0.30
III. Non-engineered timber and masonry buildings	0.20
IV. Buildings extremely susceptible to vibration damage	0.12
Source: FTA, 2018.	

In addition, the FTA guidance manual also provides vibration criteria for human annoyance for various uses. These criteria were established primarily for rapid transit (rail) projects and, as indicated in Table 4.19, *FTA Construction Vibration Impact Criteria for Human Annoyance* are based on the frequency of vibration events. Specific criteria are provided for three land use categories: (1) Vibration Category 1—High Sensitivity; (2) Vibration Category 2—Residential; and (3) Vibration Category 3—Institutional.

210 FTA, "Transit Noise and Vibration Impact Assessment," Table 7-5, September 2018. Transit Noise and Vibration Impact Assessment Manual (dot.gov)

Table 4.19
FTA Construction Vibration Impact Criteria for Human Annoyance

Land Use Category	Ground-Borne Vibration Impacts Levels (VdB)		
	Frequent Events[a]	Occasional Events[b]	Infrequent Events[c]
Category 1: Building where vibration would interfere with interior operations	65[d]	65[d]	65[d]
Category 2: Residences and buildings where people normally sleep	72	75	80
Category 3: Institutional land uses with primarily daytime uses	75	78	83

[a] *"Frequent Events" are defined as more than 70 vibration events of the same source per day.*

[b] *"Occasional Events" are defined as between 30 and 70 vibration events of the same source per day.*

[c] *"Infrequent Events" are defined as fewer than 30 vibration events of the same source per day.*

[d] *This criterion limit is based on the levels that are acceptable for most moderately sensitive equipment such as optical microscopes.*

Source: FTA, 2018.

Methodology

Temporary Construction Noise

Potential construction noise impacts due to on-site construction activities associated with the Project were evaluated by calculating the construction-related noise levels at the representative receptor locations and comparing these estimated Project construction-related noise levels to the measured existing ambient noise levels (i.e., noise levels without construction noise from the Project). Construction noise associated with the Project was analyzed based on the Project's potential construction equipment inventory, construction durations, and construction schedule. The construction equipment noise levels are based on the published noise data (equipment source levels) by Federal Highway Administration (FHWA) "Roadway Construction Noise Model (FHWA 2006)". The construction noise levels were then calculated for the identified sensitive receptor locations based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance. For the noise analysis, a 5 dBA attenuation was assigned for receptor locations where the acoustic line-of-sight is just interrupted (i.e., around the edge of a building).

In addition, the potential construction-related off-site truck noise impacts were analyzed using the FHWA's Traffic Noise Model (TNM). The TNM noise model calculates the hourly L_{eq} noise levels generated by construction-related trucks. Potential noise impacts were determined by comparing the predicted noise level generated by construction-related off-site trucks with the existing ambient noise levels.

Temporary Construction Vibration

Ground-borne vibration impacts due to the Project's construction activities were evaluated by identifying potential vibration sources (i.e., construction equipment), estimating the vibration levels at the identified representative sensitive-receptor locations, and comparing the Project's vibration levels at those locations to the applicable vibration significance criteria, as described below.

Vibration levels were calculated based on the FTA published standard vibration velocities for various construction equipment operations. The vibration velocities were calculated based on a point source with standard distance propagation conditions, pursuant to FTA procedures. Construction of the Project would not use impact pile driving methods and as such, impact pile driving vibration is not included in this construction vibration analysis.[211]

Operation Noise

The Project's potential on-site stationary point-source noise impacts were evaluated by (1) identifying the noise levels that would be generated by the Project's stationary noise sources, such as rooftop mechanical equipment, outdoor activities (e.g., use of the outdoor courtyard, roof deck and terraces), and parking facilities; (2) calculating the noise level from each noise source at the identified surrounding representative sensitive-receptor property line locations; and (3) comparing such noise levels to the measured ambient noise levels to determine significance. The on-site stationary noise sources were calculated using SoundPLAN (version 8.2), a 3-dimensional computer noise prediction model, which calculates noise transference (propagation) using approved engineering procedures and incorporates national and international noise standards. This calculation tool is widely used by acoustical engineers as a noise modeling tool for environmental noise analysis.

The Project's potential off-site roadway noise was analyzed using the FHWA's TNM, based on the roadway traffic data provided in the Project's transportation study. The TNM is the current Caltrans standard computer noise model for traffic noise studies. The model allows for the input of roadway parameters, noise receivers, and sound barriers (if any). Roadway noise attributable to the Project's "existing plus project" scenario was calculated and compared to the "existing without project" scenario noise levels to determine the Project's potential off-site roadway noise impacts.

Noise Measurement Results

Based on a review of the land uses in the Project area, there are noise-sensitive land uses (i.e., residential uses and park) surrounding the Project Site to the north, south, east and west. A total of five off-site noise-sensitive receptor locations surrounding the Project Site were selected to represent the multiple noise-sensitive uses surrounding the Project Site. The locations of the five

211 FTA, "Transit Noise and Vibration Impact Assessment," Table 7-4, September 2018. Transit Noise and Vibration Impact Assessment Manual (dot.gov)

off-site noise-sensitive receptor locations are described in Table 4.20, *Existing Ambient Noise Levels*.

Ambient noise measurements were taken at the five selected off-site locations on October 19, 2022. The ambient noise measurements were conducted using a Larson-Davis Model 870 and a Quest Model 2900 Integrating/Logging Sound Level Meters. These sound level meters meet and exceed the minimum industry standard performance requirements for "Type 1" and "Type 2" standard instruments as defined in the American National Standard Institute (ANSI) S1.4. A 24-hour measurement was conducted at receptor R2. Two 15-minute measurements were conducted at off-site receptors R1, R3, R4 and R5, one during the daytime hours and another during the nighttime hours. The daytime ambient noise levels were measured between 10:00 A.M. and 12:00 P.M., and the nighttime ambient noise levels were measured between 10:00 P.M. and 12:00 A.M. The ambient noise measurements were taken in accordance with the City's standards.

The results of the ambient sound measurements are summarized in Table 4.20. As indicated Table 4.20, the existing daytime ambient noise levels at the off-site receptor locations ranged from 56.4 dBA L_{eq} (at receptor R3) to 68.3 dBA L_{eq} (at receptor R5), while the measured nighttime ambient noise levels ranged from 52.6 dBA L_{eq} (at receptor R2) to 62.8 dBA L_{eq} (at receptor R5). Based on field observation and the measured sound data, the current ambient noise environment in the vicinity of the Project Site is controlled primarily by vehicular traffic on local roadways (e.g., North Cahuenga Boulevard), commercial uses, and other typical urban noise. The existing ambient noise levels at all receptor locations currently exceed the City's exterior presumed daytime ambient noise standard of 50 dBA (L_{eq}) and presumed nighttime ambient noise standard 40 dBA (L_{eq}), for residential uses. Therefore, consistent with the LAMC, the measured existing ambient noise levels are used as the baseline conditions for the purposes of determining the Project's potential noise impacts.

Temporary Construction Noise

Project construction would generate noise from on-site construction activities and from off-site construction traffic.

On-Site Construction Noise

Noise levels generated from on-site Project construction activities would be a function of the noise generated by construction equipment, the location of the equipment, the timing and duration of the noise-generating construction activities, and the relative distance to noise-sensitive receptors. Construction activities for the Project would generally include demolition, site grading, building construction, and landscaping. Each stage of construction would involve the use of various types of construction equipment and would, therefore, have its own distinct noise characteristics. Demolition generally involves the use of backhoes, front-end loaders, and heavy-duty trucks. Grading and excavation typically require the use of earth-moving equipment, such as excavators, front-end loaders, and heavy-duty trucks. Building construction typically involves the use of forklifts, concrete trucks, concrete pumps, and delivery trucks. Project construction equipment would generate both steady-state and episodic noise that could be heard at locations within and

adjacent to the Project Site. Construction of the Project is anticipated to take approximately 19 months.

Table 4.20
Existing Ambient Noise Levels

Receptor Location	Approximate Distance to Project Site,[a] Feet	Measured Ambient Noise Levels, dBA L_{eq}		CNEL, (24-hour)
		Daytime Hours (7 a.m. to 10 a.m.)	Nighttime Hours (10 p.m. to 7 a.m.)	
R1 – Single-family residential use located on the north side of La Mirada Avenue, north of the Project Site	35	57.8	58.8	63.3[b]
R2 – Multi-family residential use on the north side of Lexington Avenue, adjacent to the Project Site to the east	Adjacent to the Project Site	57.0[c]	52.6[c]	60.4
R3 – Multi-family residential use on the south side of Lexington Avenue, south of the Project Site	50	56.4	55.2	60.1[b]
R4 – Park use on the westside of North Cahuenga Boulevard, southwest of the Project Site	250	64.9	60.3	66.3[b]
R5 – Multi-family residential use on the west side of North Cahuenga Boulevard, west of the Project Site	80	68.3	62.8	69.2 [b]

[a] *Distances are estimated based on Google Earth map and are referenced to the Project nearest boundary.*
[b] *Estimated based on short-term (15-minute) noise measurement.*
[c] *Levels shown for R2 represent the average for the entire daytime and nighttime periods.*
Source: AES, 2022; Detail measurements data are provided in Appendix A of the Technical Report.

Individual pieces of construction equipment that would typically be used for construction produce maximum noise levels of 74 dBA to 90 dBA at a reference distance of 50 feet from the construction equipment, as shown in Table 4.21, *Construction Equipment Noise Emission Reference Levels and Usage Factors*. It should be noted that pile drivers are not included in Table 4.20 because Project Design Feature **PDF NOI-1** prohibits their use. The construction equipment noise levels produced at the 50-foot distance (Reference Maximum Noise Levels at 50 Feet) shown in Table 4.20 are taken from the FHWA Roadway Construction Noise Model User's Guide (RCNM, 2006), which is a technical report containing actual measured noise data for construction equipment.[212] These maximum noise levels would occur when equipment is operating under full power conditions (i.e., the equipment engine at maximum speed). However, equipment used on

212 FHWA, Roadway Construction Noise Model User's Guide, 2006. Roadway Construction Noise Model User's Guide (dot.gov)

construction sites often operates under less than full power conditions, or part power. To characterize construction-period noise levels more accurately, the average (Hourly L_{eq}) noise level associated with each construction stage is calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage.[213] These noise levels are typically associated with multiple pieces of equipment operating simultaneously.

Table 4.22, *Construction Noise Levels (Without Incorporation of Mitigation Measure MM NOI-1),* provides the Project's estimated construction noise levels without Project's incorporation of Mitigation Measure **MM NOI-1** for various construction phases at the identified off-site noise sensitive receptor locations. To present a conservative impact analysis, the Project's "without Mitigation Measure **MM NOI-1**" estimated noise levels were calculated for a scenario in which all pieces of construction equipment were assumed to be operating simultaneously and to be located at the construction area nearest to the sensitive receptors. These assumptions represent the worst-case "without Mitigation Measure **MM NOI-1**" 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 sensitive receptors. As reported in Table 4.22, the estimated "without Mitigation Measure **MM NOI-1**" construction noise levels at off-site noise sensitive receptor locations R1, R2, R3 and R5 would exceed the significance criteria by up to 11.6, 13.8, 10.1, and 6.7 dBA, respectively.

However, as discussed above, the Applicant has agreed to, and the Project has incorporated, Mitigation Measure **MM NOI-1**. As reported in Table 4.23, *Construction Noise Levels (With Incorporation of Mitigation Measure MM NOI-1*), the Project's on-site construction noise levels at receptor locations R1, R2, R3 and R5 would be a minimum of 12, 14, 11 and 7 dBA, respectively, lower than the noise levels shown in Table 4.22, and less than significant, assuming incorporation of Mitigation Measure **MM NOI-1**. Therefore, the Project's potential temporary on-site construction noise impacts would be less than significant, with incorporation of mitigation measures.

213 Pursuant to the FHWA Roadway Construction Noise Model User's Guide, 2006, the usage factor is the percentage of time during a construction noise operation that a piece of construction is operating at full power.

Table 4.21
Construction Equipment Noise Emission
Reference Levels and Usage Factors

Type of Equipment	Acoustical Usage Factor (%)	Reference Maximum Noise Levels at 50 Feet,[a] L_{max} (dBA)
Air Compressor	40	78
Backhoe	40	78
Cement and Mortar Mixer	50	80
Concrete Saw	20	90
Crane	16	81
Dozer	40	82
Dump/Haul Truck	40	76
Excavator	40	81
Forklift	20	75
Generator Set	50	81
Grader	40	85
Jackhammer	20	89
Man Lift	20	75
Paving Equipment	50	77
Roller	20	80
Rubber Tired Loader	40	79
Delivery Truck	40	74
Welders	40	74
Pneumatic Tool	50	85

[a] *Construction equipment noise levels are based on the FHWA RCNM.*
Source: FHWA Roadway Construction Noise Model User's Guide, Table 1, 2006.

Table 4.22
Construction Noise Levels
(Without Incorporation of Mitigation Measure MM NOI-1)

Location	Estimated Noise Levels by Construction Phase,[a, b] dBA (L_{eq})					Significance Criteria, dBA (L_{eq})	Exceedance Over Significance Criteria, dBA (L_{eq})
	Demolition	Grading	Building Construction	Paving	Arch. Coating		
R1	**86.6**	**86.1**	**80.9**	**81.9**	**77.1**	75.0	11.6
R2	**88.8**	**88.5**	**82.9**	**84.4**	**80.0**	75.0	13.8
R3	**85.1**	**84.5**	**79.7**	**80.1**	74.0	75.0	10.1
R4	72.9	71.5	68.1	67.3	60.0	75.0	0.0
R5	**81.7**	**80.8**	**76.5**	**76.5**	69.9	75.0	6.7

[a] *Detailed calculation worksheets, are included in Appendix B.*
[b] ***Bold-faced*** *represents noise levels exceeded the significance criteria.*
Source: AES, 2022.

Table 4.23
Construction Noise Levels
(With Incorporation of Mitigation Measure MM NOI-1)

Location	Estimated Noise Levels by Construction Phase,[a, b] dBA (L_{eq})					Significance Criteria, dBA (L_{eq})
	Demolition	Grading	Building Construction	Paving	Arch. Coating	
R1	74.6	74.1	68.9	69.9	65.1	75.0
R2	74.8	74.5	68.9	70.4	66.0	75.0
R3	74.1	73.5	68.7	69.1	63.0	75.0
R4	72.9	71.5	68.1	67.3	60.0	75.0
R5	74.7	73.8	69.5	69.5	62.9	75.0

[a] *Detailed calculation worksheets, are included in Appendix B.*
[b] ***Bold-faced*** *represents noise levels exceeded the significance criteria.*
Source: AES, 2022.

Off-Site Construction Noise

In addition to on-site construction noise sources, materials delivery, concrete mixing, and haul trucks (construction trucks), and construction worker vehicles would require access to the Project Site during the Project construction period. The major noise sources associated with offsite construction trucks would be from haul trucks during the site grading, which would require a total of approximately 906 haul trips, with approximately 40 trucks per day. Construction-related trucks would be fewer during other construction phases. Therefore, the noise analysis is based on the peak period (site grading phase) with a maximum of 40 trucks (80 truck trips) per day. Based on a six-hour haul period and a uniform distribution of trips, there would be 14 truck trips per hour. Haul trucks would generally access the Project Site via North Cahuenga Boulevard and Santa Monica Boulevard to the Hollywood Freeway (US-101).

Noise generated by construction trucks along the anticipated haul route, Santa Monica Boulevard and North Cahuenga Boulevard leading to the Project Site, would be approximately 60.3 dBA (hourly L_{eq}), which would be below the measured existing ambient noise environment of 64.9 dBA along North Cahuenga Boulevard Avenue (measured ambient at receptor R4). The existing ambient noise environment along Santa Monica Boulevard would be higher than that along North Cahuenga Boulevard, as Santa Monica Boulevard has higher traffic volume; therefore, the noise generated by construction trucks along Santa Monica Boulevard would also be below that street's existing ambient noise environment. As such, significant noise impacts would not be expected from off-site construction traffic, and no additional noise control measures are required.

Operation Noise

Noise associated with Project operation would include: (a) on-site stationary noise sources, including outdoor mechanical equipment (e.g., HVAC equipment), activities within the proposed outdoor spaces (e.g., use of the outdoor courtyard, roof deck and terraces), and parking facilities; and (b) off-site mobile (roadway traffic) noise sources.

Mechanical Equipment

The Project would include new mechanical equipment (e.g., HVAC air ventilation equipment), which would be located at the roof level and/or within the building structure. Project-related outdoor mechanical equipment is required to be designed so as not to increase the existing ambient noise levels by 5 dBA in accordance with the City's Noise Regulations (Section 112.02 of the LAMC). Table 4.24, *Mechanical Equipment Noise Levels* presents the estimated on-site mechanical equipment noise levels at the off-site receptor locations. As shown in Table 4.24, the estimated noise levels generated by the mechanical equipment would range from 34.2 dBA (L_{eq}) at receptor R2 to 45.5 dBA (L_{eq}) at receptor R5, which would be below the Project's significance criteria and the existing ambient noise levels at all sensitive receptor locations; further, the Project noise level from the mechanical equipment added to the ambient noise level at each sensitive receptor location yields a noise level that would also be below the threshold for each sensitive receptor. As such, potential noise impacts from the Project mechanical equipment would be less than significant.

Table 4.24
Mechanical Equipment Noise Levels

Receptor Location	Existing Ambient Noise Levels, dBA (Leq)	Estimated Noise from Project Mechanical Equipment, dBA (Leq)	Ambient + Project Noise Levels, dBA (Leq)	Significance Criteria[a] dBA (L_{eq})	Exceed over Significance Criteria	Significant Impact?
R1	57.8	43.3	58.0	62.8	0.0	No
R2	52.6	34.2	52.7	57.6	0.0	No
R3	55.2	43.2	55.5	60.2	0.0	No
R4	60.3	40.3	60.3	65.3	0.0	No
R5	62.8	45.5	62.9	67.8	0.0	No

Notes:
[a] *Significance Criteria are equivalent to the measured daytime or nighttime ambient noise levels, whichever is lower plus 5 dBA, per the City of Los Angeles Noise Regulations.*
Source: AES, 2022.

Outdoor Spaces

The Project's outdoor amenities would include several common outdoor spaces, including: a courtyard at 1st Floor, two covered terraces at 2nd Floor (Building A), four exterior decks at 3rd Floor (Buildings A & C), and four exterior decks at the 4th Floor (Buildings A & C). Noise sources associated with outdoor uses typically include noise from people gathering and conversing. For this operational noise analysis, reference noise levels of 65 dBA for a male and 62 dBA for a female speaking in a raised voice were used for analyzing potential noise impacts from people

gathering at the outdoor spaces.[214] The noise analysis assumed up to 120, 43, 328 and 578 people gathering at the outdoor spaces at 1st Floor, 2nd Floor, 3rd Floor, and 4th Floor, respectively. The number of people is calculated based on 15 square feet per person.

An additional potential noise source associated with outdoor spaces would be the use of an outdoor sound system (e.g., music or other sounds broadcast through an outdoor mounted speaker system) at the outdoor spaces. As set forth in the Project Design Feature **PDF NOI-2**, if an amplified sound system is used, it would be designed so as not to produce sound exceeding the maximum noise level of 80 dBA L_{eq} at a distance of 15 feet from the face of the loudspeakers, at all outdoor spaces, which would ensure that the amplified sound system would not produce noise levels exceed the significance criteria (i.e., an increase of 5 dBA L_{eq}) at any off-site noise sensitive receptor location.

Table 4.25, *Outdoor Uses Noise Levels* presents the estimated noise levels at the off-site sensitive receptors resulting from the use of the Project's outdoor areas. The estimated noise levels were calculated based on the assumption that the outdoor spaces would be fully occupied and operating concurrently, to represent a worst-case noise analysis. As presented in Table 4.25, the estimated noise levels from the outdoor spaces would range from 49.1 dBA (L_{eq}) at receptor location R2 to 58.0 dBA (L_{eq}) at receptor location R5, which levels would be below the Project's significance criteria and the ambient noise levels at all sensitive receptor locations other than R3; further, the Project noise level from the outdoor areas added to the ambient noise level at each sensitive receptor location yields a noise level that would also be below the threshold for each sensitive receptor. Therefore, noise impacts from the outdoor uses would be less than significant, and no mitigation measures are required.

Table 4.25
Outdoor Uses Noise Levels

Receptor Location	Existing Ambient Noise Levels, dBA (L_{eq})	Estimated Noise from Outdoor Uses, dBA (L_{eq})	Ambient + Project Noise Levels, dBA (L_{eq})	Significance Criteria[a] dBA (L_{eq})	Exceed over Significance Criteria	Significant Impact?
R1	57.8	50.9	58.6	62.8	0.0	No
R2	52.6	49.1	54.2	57.6	0.0	No
R3	55.2	56.6	59.0	60.2	0.0	No
R4	60.3	51.6	60.8	65.3	0.0	No
R5	62.8	58.0	64.0	67.8	0.0	No

Notes:
[a] *Significance Criteria are equivalent to the measured daytime or nighttime ambient noise levels, whichever is lower plus 5 dBA, per the City of Los Angeles Noise Regulations.*
Source: AES, 2022.

[214] Cyril M. Harris, Handbook of Acoustical Measurements and Noise Control, Table 16.1, Third Edition, 1991. Handbook of Acoustical Measurements & Noise Control: Cyril M. Harris: 9781563967740: Amazon.com: Books

Parking Facilities

Parking for the Project would be provided within two at-grade levels (in Buildings A and C) and two below-grade levels (in Buildings A and B) that would provide a total of approximately 156 parking spaces. The parking garage would be partially shielded to the exterior with the wall along the parking garages. Table 4.26, *Parking Facilities Noise Levels* presents the estimated noise levels from parking garage at the offsite receptor locations. As indicated in Table 4.26 the estimated noise levels from the parking garage would range from 27.5 dBA (L_{eq}) at receptor location R4 to 41.2 dBA (L_{eq}) at receptor location R1, which would be below the Project significance criteria. Therefore, noise impacts from the parking garage would be less than significant, and no mitigation measures are required.

Table 4.26
Parking Facilities Noise Levels

Receptor Location	Existing Ambient Noise Levels, dBA (L_{eq})	Estimated Noise from Project Parking, dBA (L_{eq})	Ambient + Project Noise Levels, dBA (L_{eq})	Significance Criteria[a] dBA (L_{eq})	Exceed over Significance Criteria	Significant Impact?
R1	57.8	41.2	57.9	62.8	0.0	No
R2	52.6	28.0	52.6	57.6	0.0	No
R3	55.2	36.0	55.3	60.2	0.0	No
R4	60.3	27.5	60.3	65.3	0.0	No
R5	62.8	36.1	62.8	67.8	0.0	No

Notes:
[a] *Significance criteria are equivalent to the measured daytime or nighttime ambient noise levels, whichever is lower plus 5 dBA, per the City of Los Angeles Noise Regulations.*
Source: AES, 2022.

Off-Site Traffic

Potential Project-generated traffic noise impacts were evaluated by comparing the increase in noise levels from the "existing" condition scenario to the "existing plus project" condition scenario, in the Traffic Assessment, against the Project's significance threshold. Traffic noise levels at the off-site noise sensitive receptor locations were calculated using FHWA's Traffic Noise Model and the Project's traffic volume data from the Traffic Assessment.[215] The traffic noise impact analysis is based on the 24-hour CNEL noise descriptor.

Table 4.27*, Off-Site Roadway Traffic Noise Impacts* provides a summary of the off-site traffic noise analysis. As shown in Table 4.27, traffic from the Project would result in a maximum

[215] Overland Traffic Consultants, Inc., email dated 8/24/2022.

Table 4.27
Off-Site Roadway Traffic Noise Impacts

Roadway Segment	Calculated Traffic Noise Levels,[a] CNEL (dBA)			Increase in Noise Levels, CNEL (dBA)		Significant Impact?	
	Existing Without Project (A)	Future Without Project (B)	Future With Project (C)	Project Level (C – B)	Cumulative (C – A)	Project Level	Cumulative
North Cahuenga Boulevard							
- Between De Longpre Ave. and Fountain Ave.	71.1	71.9	71.9	0.0	0.8	No	No
- Between Fountain Ave. and Lexington Ave.	70.8	71.4	71.4	0.0	0.6	No	No
- Between Lexington Ave. and Santa Monica Blvd.	70.8	71.3	71.3	0.0	0.5	No	No
Vine Street							
- Between De Longpre Ave. and Fountain Ave.	72.3	72.8	72.8	0.0	0.5	No	No
- Between Fountain Ave. and Lexington Ave.	72.2	72.7	72.7	0.0	0.5	No	No
- Between Lexington Ave. and Santa Monica Blvd.	72.2	72.7	72.7	0.0	0.5	No	No
Fountain Avenue							
- Between Wilcox Ave. and Cahuenga Blvd.	70.1	70.4	70.5	0.1	0.4	No	No
- Between North Cahuenga Blvd. and Vine St.	70.2	71.0	71.0	0.0	0.8	No	No
- Between Vine St. and El Centro Ave.	69.9	70.2	70.2	0.0	0.3	No	No
Lexington Avenue							
- Between Wilcox Ave. and North Cahuenga Blvd.	66.5	67.0	67.0	0.0	0.5	No	No
- Between North Cahuenga Blvd. and Vine St.	65.8	66.4	66.5	0.1	0.7	No	No
- Between Vine St. and El Centro Ave.	64.2	64.6	64.6	0.0	0.4	No	No

[a] *Detailed calculation worksheets, are included in Appendix C.*
Source: AES, 2022.

noise increase of 0.1 dBA along Fountain Avenue (between Wilcox Avenue and North Cahuenga Boulevard) and along Lexington Avenue (between North Cahuenga Boulevard and Vine Street), which is considered a negligible increase. In addition, the cumulative traffic volumes would result in a maximum increase of 0.8 dBA CNEL along North Cahuenga Boulevard (between De Longpre Avenue and Fountain Avenue) and along Fountain Avenue (between North Cahuenga Boulevard and Vine Street); again, however, the Project's contribution would be negligible and, therefore, not cumulatively considerable. Generally, a minimum 3 dBA change in the ambient noise environment (increase and/or decrease) is considered to be at the threshold of human perception, which the City has adopted as its threshold of significance. The estimated noise increases would be below the 3 dBA significance threshold under both Project and Cumulative level. Therefore, off-site traffic noise impacts associated with the Project would be less than significant.

Composite Noise Impacts from Project Operations

An evaluation of composite noise levels, including all Project related noise sources, was conducted to identify the potential maximum Project-related noise level increase that may occur at the Project noise-sensitive receptor locations. The overall sound environment at the areas surrounding the Project Site would include contributions from each on-site individual noise source associated with the typical daily operation of the Project. Principal on-site noise sources associated with the Project would include the mechanical equipment, the parking facilities, and outdoor uses. Table 4.28, *Composite Noise Impacts* presents the estimated composite noise levels from Project-related noise sources. As reported in Table 4.28, the Project's composite noise levels would range from 55.0 dBA at receptor R2 to 62.6 dBA at receptor R5, which would be similar to the existing ambient noise levels. In addition, the Project plus ambient noise levels would be below the significance criteria at all receptor locations. Therefore, the composite noise level impacts due to Project operation would be less than significant.

Table 4.28
Composite Noise Impacts

Receptor Location	Calculated Project-Related Noise Levels, CNEL (dBA)				Project Composite Noise Levels, CNEL (dBA)	Ambient Noise Levels, CNEL (dBA)	Ambient Plus Project Composite Noise Levels, CNEL (dBA)	Significance Criteria[a], CNEL (dBA)
	Traffic	Mechanical	Parking	Outdoor Uses				
R1	44.9	50.0	47.9	55.0	57.0	63.3	64.2	68.3
R2	49.5	40.9	34.7	53.2	55.0	60.4	61.5	65.4
R3	49.5	49.9	42.7	60.7	61.4	60.1	63.8	65.1
R4	44.9	47.0	34.2	55.7	56.6	66.3	66.7	71.3
R5	44.9	52.2	42.8	62.1	62.6	69.2	70.1	72.2

[a] *Significance criteria are equivalent to the existing ambient plus 3 dBA if the estimated noise levels (ambient plus Project) fall within the "normally unacceptable" or "clearly unacceptable" land use categories or ambient plus 5 dBA if the estimated noise levels fall within the "normally acceptable" or "conditionally acceptable" land use categories, per the City of Los Angeles Noise Element. If the estimated noise levels exceed those significance criteria, a noise impact is identified.*

Source: AES, 2022.

Project Design Features

The Project incorporates the following Project Design Feature (PDF), and the Applicant has agreed to incorporate the following Mitigation Measure into the Project to avoid or reduce the Project's potential construction noise and vibration impacts.

PDF NOI-1: Project construction will not include the use of driven (impact) pile systems.

PDF NOI-2: Outdoor amplified sound systems, if any, will be designed so as not to exceed the maximum noise level of 80 dBA (L_{eq}) at a distance of 15 feet from the face of the loudspeakers, from all outdoor spaces. A qualified noise consultant will provide written documentation that the design of the system complies with this maximum noise level.

Mitigation Measures

MM NOI-1: A temporary and impermeable sound barrier shall be erected at the following locations, prior to the start of earth moving activities. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

- Along the northern property line of the Project Construction Site between the construction area and the residential uses to the north (represented by receptor location R1). The temporary sound barrier shall be designed to provide a minimum 12-dBA noise reduction at the ground level of receptor location R1.
- Along the southern property line of the Project Construction Site between the construction area and the residential use to the east (represented by receptor location R2). The temporary sound barrier shall be designed to provide a minimum 14-dBA noise reduction at the ground level of receptor location R2.
- Along the southern property line of the Project Construction Site between the construction area and the residential uses to the south (represented by receptor location R3). The temporary sound barrier shall be designed to provide a minimum 11-dBA noise reduction at the ground level of receptor location R3.
- Along the western property line of the Project Construction Site between the construction area and the residential uses to the west (represented by receptor location R5). The temporary sound barrier shall be designed to provide a minimum 7-dBA noise reduction at the ground level of receptor location R5

b. Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant With Mitigation Incorporated. A significant impact may occur if a project were to generate excessive vibration during construction or operation.

Temporary Construction Vibration

Construction activities can generate varying degrees of ground vibration, depending on the construction procedures and the type of construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site often varies, depending on soil type, ground strata, and construction characteristics of the receptor buildings.

The Project would generate ground-borne construction vibration forces during building demolition and site excavation/grading activities when heavy construction equipment, such as large bulldozers/excavators and loaded trucks, would be used. The FTA has published standard vibration velocities levels for various construction equipment operations. It is noted that[216], pursuant to **PDF NOI-1**, the Project construction would not use impact pile driving methods; therefore, impact pile driving vibration is not included in the on-site construction vibration analysis.

Building Damage

The City currently does not have any adopted standards, guidelines, or thresholds for assessing the significance of vibration impacts with respect to building damage. Therefore, the City utilizes criteria from the Federal Transit Administration (FTA) as threshold to assess the significance of impacts associated with potential building damage.[217] Table 4.29, *Construction Vibration Impacts – Building Damage* provides the estimated vibration levels at the nearest off-site buildings. As indicated in Table 4.29, the estimated vibration velocity levels from construction equipment would be below the significance criteria at the nearest off-site buildings. Therefore, the on-site vibration impacts, pursuant to the significance criteria for building damage, during construction of the Project would be less than significant.

216 FTA, "Transit Noise and Vibration Impact Assessment," September 2018. Transit Noise and Vibration Impact Assessment Manual (dot.gov)

217 FTA, "Transit Noise and Vibration Impact Assessment," September 2018. Transit Noise and Vibration Impact Assessment Manual (dot.gov)

Table 4.29
Construction Vibration Impacts – Building Damage

Receptor Location	Estimated Vibration Velocity Levels at the Off-Site Buildings, PPV,[a]					Significance Criteria, VdB	Sig. Impacts?
	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Levels at 25 feet	0.089	0.089	0.076	0.035	0.003	--	--
Single-story residential buildings to the North	0.037	0.037	0.032	0.015	0.001	0.3[b]	No
Single- and three-story residential buildings to the South	0.032	0.032	0.027	0.012	0.001	0.3[b]	No
Three-story residential building to the East	0.244	0.244	0.208	0.096	0.008	0.5[c]	No
Single- and two-story residential buildings to West	0.016	0.016	0.013	0.006	0.001	0.3[b]	No

[a] *Vibration level calculated based on FTA reference vibration level at a 25-foot distance. Detailed calculation worksheets, are included in Appendix B.*

[b] *FTA criteria for engineered concrete and masonry buildings.*

[c] *FTA criteria for reinforced concrete, steel or timber buildings.*

Source: FTA, 2018; AES, 2022.

Human Annoyance

The City currently does not have any adopted standards, guidelines, or thresholds relative to vibration impacts with respect to human annoyance. Therefore, criteria from the Federal Transit Administration (FTA) are utilized as thresholds to assess impacts associated with potential human annoyance.[218] Per FTA guidance, the significance criterion for human annoyance is 72 VdB for sensitive uses, including residential, assuming there are a minimum of 70 vibration events occurring during a typical construction day.

Table 4.30, *Construction Vibration Impacts – Human Annoyance (Without Incorporation of Mitigation Measure MM NOI-2)* presents the estimated vibration velocity levels (in terms of VdB) due to construction equipment at the identified representative off-site vibration sensitive receptors. The estimated vibration levels at receptor R4 are provided for information only, as there are no applicable vibration criteria for the outdoor park use. To present a worst-case analysis, the estimated vibration levels were calculated with the construction equipment assumed to be

218 FTA, "Transit Noise and Vibration Impact Assessment," September 2018. Transit Noise and Vibration Impact Assessment Manual (dot.gov)

Table 4.30
Construction Vibration Impacts – Human Annoyance
(Without Incorporation of Mitigation Measure MM NOI-2)

Off-Site Receptor Location	Estimated Vibration Velocity Levels at the Nearest Off-Site Sensitive Receptors from the Project Construction Equipment,[a,b] VdB					Significance Criteria, VdB	Sig. Impacts ?
	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer		
R1	**79.3**	**79.3**	**78.3**	71.3	50.3	72	**Yes**
R2	**98. 9**	**98. 9**	**97.9**	**90.9**	69.9	72	**Yes**
R3	**78.0**	**78.0**	**77.0**	70.0	49.0	72	**Yes**
R4	57.0	57.0	56.0	49.0	28.0	n/a[c]	No
R5	71.1	71.1	70.1	63.1	42.1	72	No

[a] *Vibration levels calculated based on FTA reference vibration level at 25-foot distance.*
[b] ***Bold-faced** represents noise levels exceeded the significance* criteria*.*
[c] *Not applicable, as there are no applicable vibration criteria for outdoor spaces.*
Source: FTA, 2018; AES, 2022.

operating at the closest distance to the off-site sensitive receptors. As indicated in Table 4.30, the estimated vibration levels due to on-site construction equipment would be below the significance threshold for human annoyance at off-site receptor location R5. However, the estimated vibration levels would exceed the significance thresholds at off-site receptor locations R1, R2 and R3. Therefore, human annoyance vibration impacts, pursuant to the significance criteria for human annoyance, due to on-site construction activities of the Project would be potentially significant without mitigation.

However, as discussed above, the Applicant has agreed to and the Project has incorporated Mitigation Measure **MM NOI-2**. As reported in Table 4.31, *Construction Vibration Impacts – Human Annoyance (With Incorporation of Mitigation Measure MM NOI-2),* the Project's on-site construction vibration levels at receptor locations R1, R2, and R3 would be reduced to below the significance criteria with the incorporation of Mitigation Measure **MM NOI-2**. Therefore, the Project's potential temporary on-site construction vibration impacts with respect to human annoyance would be less than significant.

Table 4.31
Construction Vibration Impacts – Human Annoyance
(With Incorporation of Mitigation Measure MM NOI-2)

Off-Site Receptor Location	Estimated Vibration Velocity Levels at the Nearest Off-Site Sensitive Receptors from the Project Construction Equipment,[a] VdB					Significance Threshold, VdB	Sig. Impacts?
	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer		
R1	71.8	71.8	70.8	71	50.3	72	No
R2	71.8	71.8	70.8	71.3	69.9	72	No
R3	71.8	71.8	70.8	70.0	49.0	72	No
R4	57.0	57.0	56.0	49.0	28.0	n/a[b]	No
R5	71.1	71.1	70.1	63.1	42.1	72	No

[a] *Vibration levels calculated based on FTA reference vibration level at 25-foot distance.*
[b] *Not applicable, as there are no applicable vibration criteria for outdoor spaces.*
Source: FTA, 2018; AES, 2022.

Mitigation Measures

MM NOI-2: The following mitigation measures are provided to reduce the vibration impacts associated with potential human annoyance.

- The use of large construction equipment (i.e., large bulldozer, caisson drill rig, and/or loaded trucks) shall be a minimum of:
  - 35 feet from the Project northern property line
  - 30 feet from the Project southern property line
  - 70 feet from the Project eastern property line (near the building at receptor R2)
- The use of jackhammer shall be a minimum of 35 feet from the Project eastern/southern property line (near the building at receptor R2).

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

No Impact. A significant impact would occur if the project were located in the vicinity of a private airstrip or an airport land use plan and would expose people residing or working in the project area to excessive noise levels.

The Project Site is located approximately 7.1 miles south of the Hollywood-Burbank Airport (2627 North Hollywood Way). However, the Project Site is not located within the Planning Boundary/Influence Area of the Hollywood-Burbank Airport including within the Runway

Protection Zone or Airport Land Use Plan Noise Contour, which establishes the area susceptible to noise levels that would exceed the annoyance threshold for noise (defined as >65 CNEL for commercial airports such as the Hollywood-Burbank Airport).[219] Moreover, the Project Site is not located within an existing or projected noise contour associated with any private or public airport.[220] **Therefore, no impacts would occur, and no mitigation measures are required.**

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. A significant impact could occur if a project were to locate new development, such as homes, businesses or infrastructure, with the effect of substantially inducing growth that would otherwise not have occurred as rapidly or in as great a magnitude.

Construction

The Project would replace the now-vacant Stratford School Building and its facilities with a new creative office campus that includes a 500 square-foot retail space. Although construction of the Project would provide temporary employment opportunities in the construction industry, it is unlikely that construction workers would relocate their households to obtain employment associated with construction of the Project. The construction industry differs from other employment sectors in that many construction workers are highly specialized and move from jobsite to jobsite as dictated by the demand for their skills, and they remain at a job site for only the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Therefore, it is likely that the construction workers employed for the

219 Los Angeles County, Airport Land Use Commission, Burbank/Glendale/Pasadena Airport, Airport Influence Area Map, May 13, 2003.

220 Los Angeles County Airport Land Use Commission, Los Angeles County Airport Land Use Plan, Airport Influence Area figures, adopted December 19, 1991, revised December 4, 2004; accessed: December 2022.

construction of the Project would be hired from the large, highly mobile regional construction work force already living and working within the Los Angeles metropolitan region that moves from project to project. As such, construction workers on the Project would not represent unplanned population growth, either directly or indirectly. **Impacts on population and housing due to Project construction activities would be less than significant, and no mitigation measures are required.**

Operation

Employment

As more fully described in Section 3, Project Description, of this IS/MND, the Project would replace an existing, vacant private school campus at the Project Site with an approximately 75,262 square-foot creative office campus with ground-floor retail uses. The Project would demolish 8,941 square feet of the existing two-story school building and all other school facilities on the Project Site, construct new Buildings A and C, and repurpose the remaining 19,448 square feet of the existing school building, Building B, with a few exterior modifications, as a creative office building.

Table 4.32 reports the actual estimated number of employees at the Project Site after implementation of the Project. As shown in Table 4.32, *Project Employee Generation*, the Project is estimated to generate approximately 301 employees at the Project Site.

Table 4.32
Project Employee Generation

Land Use	Size	Generation Rate	Employees
Proposed Uses			
Office	74,762 sf	.004 employees/sf	300
Retail	500 sf	0.002 employees/sf	1
		Project Total	**301**

Notes: sf = square feet
Source for generation rate: City of Los Angeles VMT Calculator Documentation, Version 1.3, LADOT, Los Angeles Department of Transportation and Los Angeles Department of City Planning, Table 1, Land Use and Trip Generation Base Assumptions, May 2020. Accessed September 2021.
Source: EcoTierra Consulting Inc. 2021.

As shown in Table 4.33, *Population, Housing, and Employment Forecasts for the City of Los Angeles Subregion*, SCAG estimates that there would be 4,135,995 residents, 1,469,828 total housing units, and 1,917,721 jobs in the City of Los Angeles in 2023, at Project buildout.

Table 4.33
Population, Housing, and Employment Forecasts
for the City of Los Angeles Subregion

Area	Population	Households	Employment
City of Los Angeles			
SCAG Forecasts			
2016	3,933,800	1,367,000	1,848,300
2023	4,135,955	1,469,828	1,917,721
2045	4,771,300	1,793,000	2,135,900
Percent Change (%)			
2020 to 2023	+5.1	+7.5	+3.8
2020 to 2045	+15.1	+22.0	+11.4
Source: *Southern California Association of Governments, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies, Demographics and Growth Forecast, Table 14, September 2021.*			

Moreover, SCAG's RTP/SCS estimates the population of the City of Los Angeles would increase to 4,771,300 residents by 2045. Housing in the City of Los Angeles is estimated by SCAG to increase to 1,793,000 housing units by 2045. Employment in the City of Los Angeles is estimated by SCAG to increase to 2,135,900 jobs by 2045.

As stated above, the Project would result in 301 jobs at the Project Site. This figure is conservative, as it is not reduced by the number of jobs the now-vacant school provided at the Project Site. Estimates extrapolated from SCAG data project the Citywide job supply to increase by 69,421 jobs between 2016 and 2023, and by 218,179 jobs between 2023 and 2045. The addition of the Project's 301 jobs would be within the growth anticipated based on SCAG projections, as they would represent approximately 0.4 percent of the Citywide total job growth for the period from 2016 to 2023, and approximately 0.1 percent of the Citywide total job growth for the period from 2016 to 2045. These increases are within the SCAG projections for employment and would therefore not represent unplanned growth within the City of Los Angeles. As such, job growth associated with the Project would be less than significant and no mitigation measures are required.

Housing

The Project Site is currently developed with vacant school uses and does not include residential units; thus, the Project would not result in direct population growth in the area. As shown in Table 4.32, the Project would result in 301 employees at the Project Site, which could include a range of full-time and part-time positions. Some of these new employment positions could be filled by persons who would relocate to the vicinity of the Project Site. However, it is not anticipated that such relocations would result in substantial unplanned housing growth in the vicinity of the Project Site as it is reasonable to expect that some of the new employment positions would be filled by persons already in the local labor force within the City of Los Angeles and surrounding cities. The Project Site is well-served by existing transit options, which would be readily available to employees commuting to and from their jobs at the Project Site. For these reasons, the Project's potential to result in substantial unplanned housing growth due to the increase in employees on the Project Site is not considered to be significant.

Population

As discussed previously, the Project does not propose the development of residential units, and its estimated 301 employment positions at the Project Site would not result in unplanned population growth, either directly or indirectly. As such, the Project would not result in a notable increase in the population of the City of Los Angeles, and any new development, should it occur, would be minor in context of forecasted growth in the City of Los Angeles. Therefore, impacts related to population growth would be less than significant.

Infrastructure

The Project is proposed for development on a Project Site located in a developed urbanized area and would not require the extension of roadways or other infrastructure (e.g., water facilities, sewer facilities, electricity transmission lines, natural gas lines, etc.) into undeveloped areas. As the Project would be supported by the existing urban infrastructure, the Project would not result in indirect unplanned population growth and impacts would be less than significant. Therefore, impacts of the Project related to unplanned population growth due to infrastructure would be less than significant, and no mitigation measures are required.

Therefore, the impact to substantial unplanned population growth in an area, either directly or indirectly would be less than significant, and no mitigation measures are required.

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. A significant impact may occur if a project would result in displacement of existing people or housing units, necessitating construction of replacement housing elsewhere.

The Project Site currently is developed with vacant school uses, and, thus, the Project would not displace existing people or housing, as no residences currently exist on the Project Site. **Therefore, no impacts would occur, and no mitigation measures are required.**

XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☐	☒
e. Other public facilities?	☐	☐	☐	☒

a. Fire protection?

Less Than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain performance objectives for fire protection. The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project to be adequate if a project is within the maximum response distance for the land use proposed. Pursuant to LAMC Section 57.09.07A, the maximum response distance between residential land uses and a LAFD fire station with an engine company is 1.5 miles, and the maximum response distance from fire stations with a truck company is 2.0 miles. If this distance is exceeded, all structures located in the applicable residential area would be required to install automatic fire sprinkler systems.

Construction

The Project proposes an office use development that would not require the construction or physical alteration of a fire station.

Construction on the Project Site would increase the potential for accidental fires from sources such as mechanical equipment and flammable construction materials. Given the nature of construction activities and the work requirements of construction personnel, however, OSHA has developed safety and health provisions for implementation during construction, which are set forth in Title 29 Code of Federal Regulations, Part No. 1926. In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by OSHA.[221] Additionally, in accordance with the provisions established by OSHA, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.[222] The transport, use, and disposal of construction-related hazardous materials would occur in conformance with manufacturers' instructions and all applicable local, State, and Federal regulations governing such activities. The Project would be required to implement standard BMPs set forth by the City of Los

221 United States Department of Labor, Occupational Safety & Health Administration, Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention.

222 United States Department of Labor, Occupational Safety & Health Administration, Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention.

Angeles and the RWQCB, which would ensure that waste generated during the construction process is disposed of properly. Compliance with these regulatory requirements would ensure that the Project's potential impacts during construction related creating a risk of fire or explosion due to transporting, handling, using and disposing of hazardous materials and non-hazardous combustible materials would be avoided or less than significant.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. However, the Project Applicant would be required to submit formal construction staging and traffic control plans for review and approval by LADOT prior to the issuance of any construction permits. A Work Area Traffic Control Plan would be developed for use during the entire construction period. The Work Area Traffic Control Plan would identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of grading and construction activity. Implementation of the approved Work Area Traffic Control Plan would minimize the potential for conflicts with or impairment of an emergency response or evacuation.

Moreover, construction impacts are temporary in nature and do not cause lasting effects that would adversely impact LAFD fire protection services. Accordingly, Project construction would not affect firefighting and emergency services to the extent that new, expanded, consolidated, or relocated fire facilities would be needed in order to maintain response distances, emergency access, or to meet other performance objectives of the LAFD.

Given the short-term nature of construction, the controlled nature of the construction activities, and the fire stations that are readily available to serve the Project Site, Project construction would not require the provision of or need for new or altered fire protection facilities, in order to maintain acceptable fire services. **Impacts on the fire services would be less than significant and no mitigation measures would be required**.

Operation

Response Distance and Time

The Project Site is served primarily by Fire Station No. 27, located at 1327 North Cole Avenue, approximately 0.4-mile to the northwest of the Project Site.[223] Fire Station No. 27 includes a Task Force Engine and Truck, a Paramedic Ambulance, a Rescue Ambulance, and Urban Search and Rescue.[224] Thus, under LAFD criteria, the existing fire response distance from Fire Station No. 27 to the Project Site is adequate for an engine company and a truck company. Regardless, the Project would install automatic fire sprinkler systems in the Project.

The Court of Appeal in *City of Hayward v. Trustees of the California State University* (2015) 242 Cal.App.4th 833 clarified that significant impacts related to fire protection services must include an adverse change in any of the physical conditions within the area of a project, and potential

223 Los Angeles Fire Department, Find Your Station Website, https://www.lafd.org/fire-stations/station-results, accessed August 2021.

224 California Fire and EMS, http://www.cafirefighters.com/lafd.htm, accessed August 2021.

impacts on emergency response times are not an environmental impact that CEQA requires a project applicant to mitigate. Consequently, delay in emergency response times and the need for additional fire protection services without an adverse physical environmental change are not environmental impacts that CEQA requires a project applicant to mitigate. A city is obligated to provide adequate fire and emergency medical services under the California Constitution. Therefore, the following discussion of response times is provided for informational purposes, only.

Although there are no known fire station construction or facilities expansion projects planned for the Project Site area, should the City of Los Angeles determine that expanded or new fire facilities are warranted, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or Mitigated Negative Declaration. Furthermore, if the demand for fire or emergency medical services in a given area increases, it is the City of Los Angeles's responsibility to ensure that new staff are assigned and equipment provided and, if needed, new or expanded facilities are built, to maintain adequate levels of service. Accordingly, in conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board of Trustees of California State University* ruling, the City of Los Angeles has and would continue to meet its legal and constitutional obligations to provide adequate public safety services, including fire protection and emergency medical services.

Response time relates directly to the physical linear travel distance (i.e., the number of roadway-miles between a fire station and a specific location) and the LAFD's ability to successfully navigate the given roadway network. Response times are measured from the time the dispatcher receives a call for service to the time the LAFD arrives at the site. Thus, roadway congestion, intersection level of service, weather conditions, and construction traffic along the response route can affect the response time. The LAFD created FireStatLA in 2014 to track and evaluate response time data in order to improve response times citywide. Response metrics for January through June 2021 show that Fire Station No. 27 had an average response time for non-EMS calls of 3 minutes and 52 seconds, and 4 minutes and 23 seconds for EMS calls.[225]

LAFD has not formally established response times standards for emergency response, or adopted the National Fire Protection Association (NFPA) standards of 5 minutes for EMS response and 5 minutes 20 seconds for fire suppression response (as established for fire department turnout time and travel time, which does not include call intake, processing, or transfer, or dispatch).[226] According to the LAFD, although response time is considered when assessing the adequacy of fire protection services, it is only one factor among several that LAFD utilizes in considering its ability to respond to fires and life and health safety emergencies, including required fire flow, response distance from existing fire stations, and the LAFD's judgment for needs in an area. If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment, and, potentially, to build new or expanded facilities, as necessary, to

225 City of Los Angeles Fire Department, Fire Stat LA, website: https://www.lafd.org/fsla/stations-map?station=27&year=2021, accessed August 2021.

226 NFPA, NFPA 1710—Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, 2020 Edition.

maintain adequate levels of service. Additionally, the LAFD, in collaboration with LADOT, has developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling along designated City of Los Angeles streets to aid in emergency response.[227] The City of Los Angeles has over 205 miles of major arterial routes that are equipped with FPS.[228]

Emergency vehicle access to the Project Site would continue to be provided from local roadways (i.e., La Mirada Avenue, N. Cahuenga Avenue, and Lexington Avenue). All Project improvements would be built in compliance with the Fire Code, and would include any additional access requirements of LAFD. Additionally, emergency access to the Project Ste would be maintained at all times during both Project construction and Project operation.

Fire Flow

The LADWP currently provides water for fire flow to the Project Site area. Fire flows are supplied by the same water mains that supply the domestic water systems, including the lines in local streets and major roadways. In general, fire flow requirements are closely related to land use as the quantity of water necessary for fire protection varies with the type of development, life hazard, type and level of occupancy, and degree of fire hazard (based on such factors as building age or type of construction).

Pursuant to LAMC Section 57.507.3.1, the City of Los Angeles-established fire flow requirements for industrial and commercial land uses are 6,000 gallons per minute (gpm) to 9,000 gpm from four to six fire hydrants flowing simultaneously. A minimum residual water pressure of 20 pounds per square inch (PSI) is to remain in the water system while the required gpm is flowing. The adequacy of the existing water pressure and the availability of the required fire flow in the Project Site area would be confirmed by LAFD during the post-approval plan check review process. As part of the normal building permit process, the Project would be required to upgrade water service laterals, meters, and related devices, if necessary, in order to provide the required fire flow; however, no new water facilities are anticipated to be required. Moreover, such improvements would be undertaken as part of the Project's construction either on-site or off-site within the right-of-way, and their effects are analyzed as part of the Project's construction impacts in this IS/MND. As such, for the reasons set forth in this IS/MND, these construction activities would be temporary and would not result in any significant environmental impacts.

Pursuant to LAMC Section 57.507.3.2, an approved fire hydrant must be located within 300 feet of all first-story portions of industrial and commercial buildings. Three fire hydrants are located in the immediate vicinity of the Project Site: southwest corner of Lillian Way and Lexington Avenue, southwest corner of N. Cahuenga Boulevard and Lexington Avenue, and southwest corner N. Cahuenga Boulevard and La Mirada Avenue. Therefore, the entire Project Site is within 300 feet of existing hydrants. As such, for the reasons set forth in this IS/MND, the construction activities

227 Los Angeles Department of Transportation, Los Angeles Signal Synchronization Fact Sheet.

228 Los Angeles Fire Department, Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles, Bulletin No. 133, October 2008.

to install any new pipes or pumping infrastructure would be temporary and short in duration, and would not result in any significant environmental impacts.

Therefore, for the reasons stated above, impacts related to the construction of new or expanded fire facilities to meet an increase in the demand for protection services would be less than significant and no mitigation measures would be required.

b. Police protection?

Less Than Significant Impact. A significant impact could occur if a project could create the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain LAPD performance objectives.

The Project would be served by the LAPD Hollywood Community Police Station located at 1358 Wilcox Avenue, approximately 0.45-mile to the northwest of the Project Site. The Hollywood Community Police Station, which is under the jurisdiction of the West Bureau, serves a community area encompassing 17.2 square miles, including the Project Site, with a service population of approximately 300,000[229]. For the purposes of the LAPD, the Hollywood Community Area boundaries are roughly defined as: Normandie Avenue on the east, West Hollywood on the west, Mulholland Drive on the north and Beverly Boulevard on the south. [230] The Project Site is located in Reporting District 666.[231]

Construction

Construction sites, if not properly managed, can have the potential to attract criminal activity (such as trespassing, theft, and vandalism) and can distract local law enforcement from more pressing matters that require their attention. However, in compliance with the City of Los Angeles's regulations, the Project would implement construction safety features at the construction site that are designed to screen the site and its activities from sight and thereby reduce or avoid the potential for attracting such criminal activity. Such measures include, for example, erecting temporary fencing along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to deter trespassing, vandalism, short-cut attractions, potential criminal activity, and other nuisances. Therefore, potential impacts to police protection services during the construction of the Project would be less than significant.

Operation

Operation of the Project could result in an on-site employment population of approximately 301 persons, which increase could generate an increase in the number of service calls from the Project Site.[232] Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents,

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229 Los Angeles Police Department Hollywood Community Police Station, https://lapdonline.org/hollywood_community_police_station/content_basic_view/1665, accessed August 2022.

230 Los Angeles Police Department Hollywood Community Police Station, About Hollywood, https://lapdonline.org/hollywood_community_police_station/content_basic_view/1665, accessed August 2021.

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

232 Refer to Section XIV. Population and Housing, of this Initial Study.

and crimes against persons could increase as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. However, in compliance with City of Los Angeles regulatory measures, the Project would implement principles of the City of Los Angeles's *Crime Prevention through Environmental Design Guidelines* subject to the approval of LAPD prior to the issuance of building permits.[233] Specifically, the Project would include adequate and strategically positioned lighting to enhance public safety. Additionally, the design of well-lit doorways and walkways, well-lit wayfinding signs on the Project Site would provide a sense of security during evening and morning hours. These preventative and proactive security measures would decrease the number of service calls LAPD would otherwise receive. In light of the Project's incorporation of these features, it is anticipated that any increase in demands upon police protection services would be relatively low, and that the Project would not necessitate the construction of a new police station, the construction of which may cause significant environmental impacts.

Although there are no known police station construction or facilities expansion projects planned for the Project Site area, should the City of Los Angeles determine that expanded or new police facilities are warranted, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or Mitigated Negative Declaration. Furthermore, as with fire services, if the demand for police services in a given area increases, it is the City of Los Angeles's responsibility to ensure that new staff are assigned and equipment provided and, if needed, new or expanded facilities are built, to maintain adequate levels of service. Accordingly, in conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board of Trustees of California State University* decision, the City of Los Angeles has and would continue to meet its legal and constitutional obligations to provide adequate public safety services, including police protection services. **Therefore, for the reasons stated above, the Project's potential impacts related to the construction of new or expanded police facilities to meet an increase in the demand for protection services would be less than significant and no mitigation measures would be required.**

c. Schools?

Less Than Significant Impact. A significant impact could occur if a proposed project included substantial employment or population growth, which could generate demand for school facilities exceeding the capacity of the school district(s) responsible for serving the project site.

The Project Site is located in an area that is currently served by several Los Angeles Unified School District (LAUSD) public schools, as well as several private schools and after-school programs. The LAUSD's jurisdiction encompasses an area of 720 square miles and serves

233 City of Los Angeles Police Department, Crime Prevention Section, Design Out Crime Guidelines: Crime Prevention through Environmental Design, November 1997.

approximately 600,000 students and operates over 1,000 schools.[234] The LAUSD is divided into six local districts, and the Project Site is located within Local District West.[235]

The following LAUSD schools currently serve the Project Site[236]:

- **Hollywood Elementary School:** located 0.7 mile southeast at 1115 Tamarind Avenue (grades expanded transitional kindergarten (ETK)-5th),
- **Joseph Le Conte Middle School:** located 0.8 mile northeast at 1316 N. Bronson Avenue (grades 6th-8th), and
- **Helen Bernstein Senior High School:** located 1.2 miles northeast at 1309 N. Wilton Place (grades 9th-12th).

As more fully described in Section 3, Project Description, of this IS/MND, the Project proposes to replace an existing, vacant private school campus at the Project Site with an approximately 75,262 square-foot creative office campus with ground-floor retail uses. As shown in Table 4.34, *Project Estimated Student Generation*, the Project could potentially generate a local student population of approximately 48 new students.

Table 4.34
Project Student Generation

Land Use	Size	Students Generated[a]			
		Elementary (K-6)	Middle School (7-8)	High School (9-12)	Total
Proposed Uses					
Office	74,762 sf	26	7	14	47
Retail	500 sf	.56	.14	.30	1
				Total New Students	**48**

Note: sf = square feet

[a] *Based on student generation factors provided in the 2020 Developer Fee Justification Study for Los Angeles Unified School District, March 2020. The ratio of students per employee in the District is 0.2354. The student generation rate of 0.00153 (employees per square foot) for "Community Shopping Centers" (Table 14) uses are applied for the retail uses (500 x 0.00153 x 0.2354 = 0.18), resulting in 1 (rounded) student.*

The student generation rate of 0.00269 (employees per square foot) for "Corporate Offices" (Table 14) uses is applied for office uses (74,762 x 0.00269 x 0.2354 = 47.3), resulting in 47 (rounded) students.

Since the LAUSD School Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the Project residential generation factors (i.e., approximately 56 percent elementary school, 14 percent middle school, and 30 percent high school).

Source: EcoTierra Consulting, Inc., May 2022.

234 Los Angeles Unified School District website: http://achieve.lausd.net/about, accessed: September 2021.

235 Los Angeles Unified School District, LAUSD Maps, website: https://achieve.lausd.net/domain/34, accessed: September 2021.

236 Los Angeles Unified School District, Explore, website: https://explorelausd.schoolmint.net/school-finder/home, accessed September 2021.

The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets the maximum fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. Development fees are required to be paid pursuant to development conditions of approval. Pursuant to SB 50, the payment of these school fees provided for in Government Code Sections 65995, 65995.5, and 65995.7 constitutes full and complete mitigation for impacts on school facilities. That is to say, SB 50 states that the exclusive method of mitigating the impact of a project on school facilities under CEQA is to pay the maximum school fees required and that such fees are "deemed to provide full and complete school facilities mitigation" related to the adequacy of school facilities when considering approval or the establishment of conditions for the approval of a development project (Government Code 65996[a] and [b]).

Pursuant to California Government Code Section 65995.5-7, the LAUSD imposes Level 1 Fees on commercial development at a rate of $0.66 per square foot of new commercial construction located within the boundaries of the LAUSD.[237] Accordingly, project applicant(s) are required to pay school fees to LAUSD to offset the impact of additional student enrollment at schools serving the Project Site area.

Pursuant to State law, the payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees, by operation of law, mitigates the Project's potential impacts on any schools. In addition, the Project's minimal potential generation of students would not create a need for new or expanded school facilities. **Therefore, the Project would create less than significant impacts related to an increased demand for school facilities and no mitigation measures would be required.**

d. Parks?

No Impact. A significant impact to parks could occur if implementation of a project included a new or physically altered park or created the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts.

As more fully described in Section 3, Project Description, of this IS/MND, the Project would demolish the majority of a vacant school building and related facilities and replace it with a creative office complex. The Project does not propose any residential uses.

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 (RAP). Nearby parks and recreational facilities within an approximate 2-mile radius of the Project Site include:

Hollywood Recreation Center (0.09 mile), De Lonpre Park (0.44 mile), Selma Park (0.56 mile), Carlton Way Park (0.78 mile), Seily Rodrigues Park (0.83), Yuca Community Center (0.85), Yucca Park (0.85 mile), Dorothy & Benjamin Smith Park (1.12 miles), La Mirada Park (1.23 miles), Burns

237 2020 Developer Fee Justification Study, Los Angeles Unified School District, March 2020, website: https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/921/LAUSD%20Dev%20Fee%20Study%202020_Final.pdf, accessed September 2021. These rates are subject to change.

Park (1.37 miles), Runyon Canyon Park (1.48 miles), Wattles Garden Park (1.74 miles), Pan Pacific Park Recreation Center (1.89 miles), and Renee Place at Pan Pacific Park (1.89 miles).[238]

As discussed above, the Project does not propose the development of residential uses that would create a demand on nearby parks and/or recreational facilities. As discussed above, the Project would generate a small number of jobs at the Project Site (301). These new employment opportunities may be filled in part by persons already residing in the vicinity of the Project Site who already utilize existing local parks and recreational facilities and in part by persons commuting from other parts of the region who utilize existing parks and recreational facilities in their own local areas and would therefore likely use the existing local parks near the Project Site intermittently, such as during lunch or after work. Therefore, only a fraction of the new employees generated by the Project would create a demand on nearby parks and/or recreational facilities. Further, as described in Section 3, Project Description, of this IS/MND, the Project would provide open space amenities for employees. Specifically, the Project would include an outdoor courtyard, terraces, and decks. A total of 30 trees would also be provided as part of the Project. The Project would also provide 11,419 square feet of landscaping, which landscaping would be added to the courtyard, terraces, decks, and on La Mirada Avenue, N. Cahuenga Boulevard, and Lexington Avenue. As such, the Project's on-site open space and amenities would help to offset any increased demand on off-site parks and recreational facilities created by the Project's net new employees. While it is possible that some of the Project's 301 net new employees may utilize local parks and recreational facilities, this increased demand would be negligible due to the low number of these new employees. In addition, overall, the greater number of Project employees would be more likely to use parks and recreational facilities near their homes during non-work hours. Therefore, while the Project's net new employment opportunities could have some potential to indirectly increase the demand for parks serving the Project Site area, that new demand for public parks and recreational facilities would be limited, and therefore the Project would not result in the need for new or altered park facilities, or substantially increase the demand for parks. **Therefore, no impacts related to an increased demand for park facilities would occur under the Project and no mitigation measures would be required.**

e. Other public facilities?

No Impact. A significant impact could occur if a project generated a demand for other public facilities (such as libraries) that exceeded the capacity available.

Other public facilities provided to the Project Site include library services. The Los Angeles Public Library System (LAPL) provides library services at the Central Library, 8 regional branch libraries, 64 community branches, and 2 bookmobile units consisting of a total of 5 individual bookmobiles, as well as through Web-based resources. The Project Site area is served by existing LAPL facilities including the John C. Fremont Branch Library (1.0 mile southwest of the Project Site),

238 City of Los Angeles Department of Recreation and Parks, Facility Map Locator within 2 miles, www.laparks.org/maplocator? cat_id=All&geo%5Bradius%5D=2&geo%5Blatitude%5D=34.0297417&geo%5Blongitude%5D=-118.2385139&address=1820%20E%208th%20St%2C%20Los%20Angeles%2C%20CA%2090021%2C%20USA, accessed June 21, 2021.

Will & Ariel Durant Branch Library (1.3 miles northwest of the Project Site), and Frances Howard Goldwyn-Hollywood Regional Library (0.6 mile to the north).

As previously discussed, the Project does not propose any residential uses. Therefore, development of the Project would not result in a direct increase in the number of residents within the service population of the local LAPL facilities. The Project would generate a small number of additional jobs (301) at the Project Site. The Project's net new employees would have internet access to LAPL and other web-based resources, which would decrease their demand on library facilities. Furthermore, as some of the Project's net new employees would commute to work from other areas in the region and would be more likely to use library facilities near their homes during non-work hours, and others of the Project's net new employees would already be residing in the vicinity of the Project Site and would already be using the local libraries, the potential indirect population generation attributable to those employees would generate minimal new demand for library services. While the Project is likely to generate some increased demand on the local libraries, that demand is not likely to be substantial on any one of the local libraries, or on all of the local libraries together. Therefore, the Project would not result in the need for new or altered library facilities, or substantially increase the demand for library services. **Therefore, no impacts related to an increased demand for other public facilities, such as libraries, would occur under the Project and no mitigation measures would be required.**

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

a. Would the project Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

Less Than Significant Impact. A significant impact could occur if a project included substantial population growth that could generate a demand for parks or recreational facilities that exceeded the capacity of existing parks or recreational facilities and caused premature deterioration of the facilities.

As discussed in Question XV(d), above, the Project does not propose the development of residential uses that would create a demand on nearby parks and/or recreational facilities. As discussed above, the Project would generate a small number of new jobs at the Project Site (301). These new employment opportunities may be filled in part by persons already residing in the vicinity of the Project Site who already utilize existing local parks and recreational facilities and in part by persons commuting from other parts of the region who utilize existing parks and recreational facilities in their own local areas and would therefore likely use the existing local parks intermittently, such as during lunch or after work. Therefore, only a fraction of the new employees generated by the Project would create a demand for parks and recreational facilities. As described in Section 3, Project Description, of this IS/MND, the Project would provide open space amenities for employees. Specifically, the Project would include a courtyard, terraces, and decks. A total of 30 trees would also be provided as part of the Project. The Project would also provide 14,667 square feet of open space and 11,419 square feet of landscaping, which landscaping would be added to the courtyard, terraces, decks, and on La Mirada Avenue, N. Cahuenga Boulevard, and Lexington Avenue. As such, the Project's on-site open space and amenities would help to offset any increased demand on off-site parks and recreational facilities created by the Project's net new employees. While it is possible that some of the Project's 301 new employees may utilize local parks and recreational facilities, this increased demand would be negligible due to the low number of these new employees. In addition, overall, the greater number of Project employees would be more likely to use parks and recreational facilities near their homes during non-work hours. Therefore, while the Project's net new employment opportunities could have some potential to indirectly increase the demand for parks and recreational facilities serving the Project Site area, that new demand would be limited. Thus, the Project would not result in the need for new or altered park facilities, or substantially increase the demand for parks. **Therefore, the Project's potential impacts related to parks and recreation would be less than significant, and no mitigation measures are required.**

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. A significant impact could occur if a project included the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment.

As discussed above, the Project proposes to replace an existing, vacant private school campus at the Project Site with an approximately 75,262 square-foot creative office campus with ground-floor retail uses. As discussed above, the Project would generate a small number of new jobs at the Project Site (301). As described in Section 3, Project Description, of this IS/MND, the Project would provide open space amenities for employees, including an outdoor courtyard, terraces, and decks with landscaping. The impacts of the construction of the open space amenities are analyzed as part of the Project throughout this IS/MND. As also discussed above, the Project does not propose any residential uses and therefore would not result in any direct substantial population growth that would increase use of existing recreational facilities. Therefore, while the Project's net new employment opportunities could have some potential to indirectly increase the demand for parks and recreational facilities serving the Project Site area, that new demand would be limited. Thus, the Project would not result in the need for new or altered park facilities, or

substantially increase the demand for parks. **Therefore, impacts related to parks and recreation would be less than significant, and no mitigation measures are required.**

XVII. TRANSPORTATION

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

The following analysis summarizes and incorporates by reference the information provided in the *Transportation Assessment for 1200 Cahuenga located at 1200-1210 N. Cahuenga Bl., 6337-6357 W. Lexington Av., & 6332-6356 W. La Mirada Av. In the Hollywood Community Plan Area of City of Los Angeles* (Transportation Assessment), prepared by Overland Traffic Consultants, Inc. dated December 2021. A Memorandum of Understanding (MOU) establishing the parameters for the Transportation Assessment was prepared and approved by the Department of Transportation (LADOT) on dated December 7, 2021. An LADOT Assessment Letter was prepared on September 14, 2022. The documents are available as Appendix K.1, K.2, and K.3, respectively to this IS/MND.

In November 2018, the California Natural Resources Agency finalized the updates to the State CEQA Guidelines, which became effective on December 28, 2018 and were subsequently adopted by the City on February 28, 2019. Based on these changes, on July 30, 2019, the City adopted the LADOT Transportation Impact Study Guidelines (TAG) which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts.

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

Less Than Significant Impact. A significant impact could occur if a project were to conflict with a program plan, ordinance, or policy designed to maintain adequate effectiveness of an overall circulation system, including transit, roadway, bicycle, and pedestrian facilities.

The City has adopted programs, plans, ordinances, and policies that establish the transportation planning framework for all travel modes, including vehicular, transit, bicycle, and pedestrian facilities. Land development projects shall be evaluated for conformance with these City adopted transportation plans, programs, and policies. Per the TAG, a project would not be shown to result in an impact merely based on whether a project would not implement a program, policy, or plan. Rather, it is the intention of this threshold test to ensure that proposed development does not conflict with or preclude the City from implementing adopted programs, plans, and policies. The TAG provides a list of key City plans, policies, programs, and ordinances for consistency review. Projects that generally conform with and do not obstruct the City's development policies and standards addressing the circulation system will generally be considered consistent. The Project's consistency with these plans, policies, programs, and ordinances is presented in Table 4.35, *Consistency Check with Key City Circulation System Plans, Programs, Ordinances, and Policies*.

Table 4.35
Consistency Check with Key City Circulation System Plans, Programs, Ordinances, and Policies

Plan or Policy	Consistent?	Notes	Preclude City Implementation?
LA Mobility Plan 2035	No	La Mirada Avenue is designated as a Local Street in the Mobility Plan 2035. Currently La Mirada Avenue is dedicated to 30 feet in width and is required to provide 60 feet. Lexington Avenue is designated as a Local Street and is currently dedicated to 50 and 55 feet in width along the Project frontage. A Local Street requires a 60-foot dedication. The western half of the property is dedicated to 30'-half street. A 15-foot by 15-foot corner cut or 20' radius dedication would be required at the southeast corner of North Cahuenga Boulevard and La Mirada Avenue. The Project proposes to seek a WDI for La Mirada Avenue – 5-foot dedication and 3-foot widening, Lexington Avenue – variable dedication and 3-foot widening, North Cahuenga Boulevard – 1-foot widening; and, southeast corner of North Cahuenga Boulevard & La Mirada Avenue – Construction of 15-foot by 15-foot corner cut or 20-foot radius.	Yes
Plan for a Healthy LA	Yes	The Project would support Policy 5.7, Land Use Planning for Public Health and Greenhouse Gas (GHG) Emission Reduction, by reducing single-occupant vehicle trips by its proximity to transit service and on-site amenities for the employees. The Project would not conflict with other policies in the Plan for Healthy LA.	No
Land Use Element of the General Plan	Yes	The Project is in the Hollywood Community Plan area. The Project would be in	No

Table 4.35
Consistency Check with Key City Circulation System Plans, Programs, Ordinances, and Policies

Plan or Policy	Consistent?	Notes	Preclude City Implementation?
(35 Community Plans)		substantial conformance with the purposes, intent, and provisions of the General Plan and the Community Plan.	
Specific Plans	NA	The Project is not within a Specific Plan area.	No
LAMC Section 12.21 A.16 (Bicycle Parking)	Yes	The Project would, at a minimum, comply with the required short- and long-term bicycle parking pursuant to LAMC Section 12.21 A16.	No
LAMC Section 12.26 J (TDM Ordinance)	Yes	LAMC Section 12.26 J for Transportation Demand Management and Trip Reduction Measures applies to the construction of new non-residential floor area greater than 25,000 square feet. The Project will comply with this requirement.	No
LAMC Section 12.37 (Waivers of Dedication and Improvement)	Yes	A waiver of dedication and improvements is requested for La Mirada Avenue, Lexington Avenue and North Cahuenga Boulevard with request to retain existing uniform street frontages, unlikely neighboring dedication and improvements and avoidance of creating hazards.	Yes
Vision Zero Action Plan	Yes	The Project will reduce the number of vehicle driveways at the site. Instead of the three existing driveways on Lexington Avenue and two existing driveways on La Mirada Avenue, the Project will retain one existing and create one new driveway on Lexington Avenue. The two existing driveways on La Mirada Avenue will be removed and one new driveway on La Mirada Avenue will be created. The Project would not preclude or conflict with the implementation of future Vision Zero projects in the public right-of-way.	No
Vision Zero Corridor Plan	Yes	The Project would not preclude or conflict with the implementation of future Vision Zero projects in the public right-of-way.	No
Citywide Design Guidelines			
Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.	Yes	The Project will create a continuous and straight sidewalk clear of obstructions for pedestrian travel. The Project will provide adequate sidewalk width and right-of-way that accommodates pedestrian flow and activity. Pedestrian access will be provided at street level with direct access to the surrounding neighborhood and amenities.	No
Guideline 2: Carefully incorporate vehicular access such that it does	Yes	The Project complies with the Citywide Design Guidelines incorporating vehicle access locations that do not discourage and/or inhibit the	No

Table 4.35
Consistency Check with Key City Circulation System Plans, Programs, Ordinances, and Policies

Plan or Policy	Consistent?	Notes	Preclude City Implementation?
not degrade the pedestrian experience.		pedestrian experience. Vehicular access and parking are located on the local streets only. The Project vehicular access complies with driveway location standards. No vehicular access is provided on North Cahuenga Boulevard	
Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.	Yes	The building design uses attractive architectural elements. The Project would not preclude or conflict with the implementation of future streetscape projects in the public right-of-way.	No
NA = not applicable. *Source: Overland Traffic Consultants, December 2021.*			

As summarized above in Table 4.35, the Project would not conflict with most key City planning documents, with the exception of the LA Mobility Plan 2035 and LAMC Section 12.37 (Waivers of Dedication and Improvement). The Bureau of Engineering (BOE)/ Department of City Planning (DCP Planning Case Referral Form (PCRF) details street classifications per the Mobility Plan 2035, current street dedications and widths and the street dedication and improvement requests of the Project. Pursuant to LAMC Section 12.37, the Project is seeking the following waiver to dedicate and improve the following along the Project frontages:

- La Mirada Avenue – 5-foot dedication and 3-foot widening;
- Lexington Avenue – variable dedication and 3-foot widening;
- North Cahuenga Boulevard – 1-foot widening; and,
- Southeast Corner of North Cahuenga Boulevard & La Mirada Avenue – Construction of 15-foot by 15-foot corner cut or 20-foot radius dedication.

The waiver is justified because the dedications and widening are not currently necessary to meet the City's mobility needs and would disrupt street frontages and potentially create hazardous situations. The Project requests to maintain the current dedications and roadways.

La Mirada Avenue is a short segment of Local Street between North Cahuenga Boulevard and Vine Street that is currently developed with residential homes. The proposed Office and small Commercial uses would not disrupt the traffic flow. La Mirada Avenue is not a primary east-west connector road such as Santa Monica Boulevard which is one block south of the Project Site. Further dedications would also be required from the 11 single-family homes on the north side La Mirada Avenue with multiple ownerships with unlikely dedications and improvements. Moreover, the current narrower roadway may discourage cut-through traffic.

Lexington Avenue is a Local Street located one block north of Santa Monica Boulevard with multiple zero-lot line buildings including a commercial building and hotel constructed in the 1920s. These buildings are located on the same block as the Project. These buildings would negate the ability to provide widening along the entirety of the block.

North Cahuenga Boulevard is currently wider than required by the Mobility Plan 2035 and is a uniform roadway width serving the City needs. Widening it by one foot would result in significant disruption in traffic and may create unnecessary blind spots for turning vehicles and pedestrians, thereby creating hazardous situations. The BOE PCRF-required widening and dedications are unlikely to be achieved on neighboring properties and the improvements would not extend the entire block. Discontinuous improvements do not yield practical benefits to the City's mobility needs and may hinder movement with street frontages that are not uniform. As the widening and dedication required along La Mirada Avenue, Lexington Avenue and North Cahuenga Boulevard are unnecessary, would disrupt uniform street frontages and potentially create hazardous situations, the requirement to construct the 15-feet by 15-feet corner cut or a 20-foot radius improvement would be unnecessary. Instead, the Project requests to maintain the current corner cut on the southeast corner of North Cahuenga Boulevard and La Mirada Avenue.

The TAG also provides a list of questions to guide the Project's consistency review. These questions and answers relative to the Project are provided in Appendix C of the Traffic Assessment. As demonstrated in Appendix C of the Traffic Assessment, with approval of the requested waiver, the potential impacts would be less than significant. Improvements along these connecting segments of La Mirada Avenue, Lexington Avenue and North Cahuenga Boulevard have not been made at this time and are not likely to be made in the near future. **Therefore, the Project would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and impacts would be less than significant and no mitigation measures would be required.**

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. A significant impact could occur if a project's vehicle miles traveled were to substantially increase compared to existing counts.

LADOT's TAG establishes analysis methods and impact significance criteria to apply in the analysis of vehicle miles traveled (VMT) effects associated with new land use projects. Specifically, Threshold T-2.1 asks whether the project would conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)(1). CEQA Guidelines Section 15064.3(b) relates to use of VMT as the methodology for analyzing transportation impacts. To address this question, LADOT's TAG established potential impact criteria for residential, office, regional-serving, and other land use development projects and identified significant VMT impact thresholds for each of seven Area Planning Commission (APC) sub-areas in the City. The Project does not propose residential land uses and is not considered to be regional-serving. Because the Project is an office development project, per Section 2.2-1 of the TAG, the Project would have a potentially significant impact if it would generate work VMT per employee exceeding 15 percent below the existing average VMT per employee for the APC in which the Project is located. The Project is in the Central APC sub-area, which limits daily work VMT per employee to a threshold value of

above 7.6 (15% below the existing VMT for the Central APC). The Project's daily work VMT per employee was calculated by the Transportation Assessment using the City's VMT Calculator Version 1.3. LADOT developed the VMT Calculator to estimate project-specific daily household VMT per capita and daily work VMT per employee for developments within City limits.

As a specific project design feature (see **PDF TR-1** below), the Project provides a sufficient number of bicycle parking spaces to meet City of Los Angeles bicycle parking requirements per LAMC Section 12.21 A.16 with 8 short-term bicycle parking spaces, 14 long-term bicycles spaces, and provide four showers and a total of 14 lockers With the Project's incorporation of **PDF TR-1**, the VMT Calculator estimated that the Project's daily work VMT per employee would be 7.6. **Accordingly, the Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) and impacts would be less than significant and no mitigation measures are required.**

Project Design Features

PDF TR-1 The following Transportation Demand Management strategies will be incorporated into the Project design:

- BICYCLE INFRASTRUCTURE – Include Bike Parking per LAMC - This strategy involves implementation of short and long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations under existing LAMC regulations applicable to the Project. The Project is required to, and will provide, a minimum of 22 bicycle parking spaces.

- BICYCLE INFRASTRUCTURE – Include Bike Parking and Showers - This strategy involves implementation of additional end of trip bicycle facilities to support safe and comfortable bicycle travel by providing amenities at the Project. This Project will provide up to four showers and 14 secure lockers.

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

Less Than Significant Impact. A significant impact could occur if a project were to include a new roadway design or introduce a new land use or project feature into an area with specific transportation requirements, characteristics, or project access or other features designed in such a way as to create hazardous conditions.

Impacts regarding the potential to increase hazards due to a geometric design feature generally relate to the design of access points to and from a project site, and may include safety, operational, or capacity impacts. Impacts can be related to vehicle conflicts as well as to operational delays caused by vehicles slowing and/or queuing to access a project site. A review of the Project Site plans was conducted to identify any hazardous geometric design features.

Vehicular access to all parking would be provided from new driveways on the adjacent Local Streets of La Mirada Avenue and Lexington Avenue. No driveways would be introduced on N.

Cahuenga Boulevard, a designate Modified Avenue II roadway. There would also be a reduction in the number of driveways onto the city streets. Currently there are two driveways for the Project Site on Lexington Avenue. One driveway would be removed, one driveway would remain and one new driveway would be constructed. The two existing driveways on La Mirada Avenue would be removed and one driveway would be constructed. By providing one less driveway, the Project would reduce the number of potential hazard points with pedestrians, cyclists and other vehicles. Furthermore, the Project's local street access would be consistent with LADOT driveway placement and location per LADOT Manual of Policies and Procedures, Section 321, Driveway Design. **Accordingly, the Project would not substantially increase hazards due to a geometric design feature or incompatible uses and impacts would be less than significant and no mitigation measures would be required.**

d. Result in inadequate emergency access?

Less Than Significant Impact. A significant impact could occur if a project design did not provide emergency access meeting the requirements of the Fire Department or in any other way threatens the ability of emergency vehicles to access and serve the project site or adjacent uses.

Construction

Construction activities have the potential to affect emergency access, by adding construction traffic to the street network and requiring partial lane closures during street improvements and utility installations. However, any such closures would be temporary in nature and would be coordinated with the Departments of Transportation, Building and Safety, and Public Works. The temporary closures would not be expected to substantially interfere with emergency response or evacuation plans.

To ensure limited interruptions due to construction activities, the Project includes project design feature **PDF TR-2** to ensure adequate circulation and emergency access through implementation of a Construction Traffic Control/Management Plan (CTM Plan) that will be approved by LADOT. The CTM Plan would minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project. While it is expected that the majority of construction activities for the Project would primarily be confined on-site, limited offsite 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 should be necessary, the remaining travel lanes would be maintained in accordance with the LADOT-approved CTM Plan. Therefore, the Project would not cause permanent alterations to vehicular circulation routes and patterns or impede public access or travel upon public rights-of-way. **As such the Project would not result in inadequate emergency access during construction and impacts would be less than significant and no mitigation measures would be required.**

Operation

There are no hazardous design features included in the proposed vehicular design or site plan for the Proposed Project that could impede emergency access. The Proposed Project does not propose the permanent closure of any local public streets and primary access to the Project Site

would continue to be provided from La Mirada Avenue and Lexington Avenue. Furthermore, the Proposed Project would be subject to the plan review requirements of the LAFD pursuant to Section 118 of the Fire Code to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles. All Project driveways would be designed according to LADOT standards to ensure adequate access, including emergency access, to the Project Site. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the Proposed Project. **Therefore, the Project would not result in inadequate emergency access during operation and impacts would be less than significant and no mitigation measures would be required.**

Project Design Features

PDF TR-2 The Applicant will, prior to construction, develop a Construction Traffic Control/Management Plan (CTM Plan) to be approved by LADOT to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project. The CTM Plan will identify the location of any roadway closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. The CTM Plan will also address the potential conflicts associated with concurrent construction activities of related projects, if applicable.

XVIII. TRIBAL CULTURAL RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact With Mitigation Incorporation. Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074, as part of the CEQA review process. As specified in AB 52, lead agencies must provide notice inviting consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of proposed projects in that area. The Tribe must respond in writing within 30 days of the City's AB 52 notice. The Native America Heritage Commission (NAHC) provided a list of Native American groups and individuals who might have knowledge of the religious and/or cultural significance of resources that may be in and near the Project Site. An informational letter was mailed to ten tribes known to have resources in the Project Site area describing the Project and requesting any information regarding resources that may exist on or near the Project Site. Letters were sent out to all contacts on March 31, 2021 (see Appendix L.1). To date, the City of Los Angeles has received one formal consultation request response to the notification letters. The request was from the Gabrieleno Band of Mission Indians-Kizh Nation on

April 6, 2021. On April 20, 2021 the City of Los Angeles staff acknowledged the start of the consultation process. A consultation notice was sent on November 17, 2022 from the Gabrieleno Band of Mission Indians-Kizh Nation to the City. Due to the Project Site being located within and around multiple perennial communities and adjacent to major traditional trade routes, there is a high potential to impact Tribal Cultural Resources still present within the soil from the thousands of years of prehistoric activities that occurred within and around these Tribal Cultural landscapes.

A Sacred Lands File (SLF) Search was performed on December 14, 2021 which indicated negative results (see Appendix L.2).[239] A records search prepared by the South Central Coastal Information Center (SCCIC) did not disclose any prior evaluations of the Project Site.[240] The SCCIC records search revealed that there have been no recorded archaeological resources within the Project Site, or within one within a half-mile radius of the Project Site. In addition, the SCCIC records search revealed there are no built-environment resources within the Project Site but there are 31 built-environment resources within a half-mile radius of the Project Site (see Appendix D).[241] The SCCIC records search also revealed that, in 1902, the historic place name of Colgrove was located south of the Project Site and Hollywood was located to the north. The search further revealed that, by 1921, there were a few buildings within the vicinity of the Project Site, and a significant increase in development, which included several buildings and a grid-like system of roads within the Project search radius. Also of note was an unnamed cemetery located in the southeastern portion of the search radius. The previously mentioned historic place names still remained.

The Hollywood Community Plan area was surveyed by SurveyLA, which did not identify any potential historic resources on the Project Site. The Project Site does not contain a historical resource subject to CEQA.

Based on the depth of excavation of the Project to 20 feet, which is approximately seven and one-half feet below the depth of the existing subterranean parking garage at the Project Site, and the location of the Project Site within a traditional trade route, there is the possibility that tribal cultural resources may be encountered during the development of the Project and therefore that impacts to tribal cultural resources may be significant. **However, the Project's incorporation of Mitigation Measure MM TCR-1, which the Applicant has previously agreed to do, would ensure that any potential tribal cultural resources encountered during the development of the Project are handled appropriately, which would reduce any such potential impacts to a less than significant level. Therefore, such impacts would be less than significant with mitigation incorporated.**

239 Correspondence from Andrew Green, Cultural Resources Analyst, Native American Heritage Commission, December 14, 2021.

240 South Central Coastal Information Center, Records Search, February 7,2022.

241 A Built Environment Resource are resources that embody the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values. Office of Historic Preservation, Built Environmental Resource Directory, https://ohp.parks.ca.gov/?page_id=30338, accessed October 18, 2022.

Mitigation Measures

MM TRC-1: In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall assess the find. Work on the portions of the Project outside of the buffered area may continue during this assessment period. The Gabrieleno Band of Mission Indians-Kizh Nation shall be contacted regarding any pre-contact and/or post-contact finds and be provided information after the archaeologist makes their initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant in accordance with applicable law, the Project applicant shall retain a professional Native American monitor procured by the Gabrieleno Band of Mission Indians-Kizh Nation to observe all remaining ground-disturbing activities including, but not limited to, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, clearing, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work. The Lead Agency and/or applicant shall, in good faith, consult with the Gabrieleno Band of Mission Indians-Kizh Nation on the disposition and treatment of any Tribal Cultural Resource encountered during all ground disturbing activities pursuant to the process set forth below.

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed Project, and (2) Department of City Planning, Office of Historic Resources (OHR).

2. If OHR determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

3. The Applicant, or its successor, shall implement the tribe's recommendations if a qualified archaeologist retained by the City and paid for by the Applicant, or its successor, in consultation with the tribal monitor, reasonably conclude that the tribe's recommendations are reasonable and feasible.

4. In addition to any recommendations from the applicable tribe(s), a qualified archeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage

Commission and in compliance with any applicable federal, state or local law, rule or regulation.

5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or qualified tribal monitor, the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the archaeologist or tribal monitor; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate an significant impacts to tribal cultural resources. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.

6. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.

7. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in Items 2 through 5 above.

8. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the SCCIC at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.

9. Notwithstanding Item 8 above, any information that the Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

The following analysis of the potential utilities and service systems impacts of the Project is based, in part, on the information and conclusions contained within the *1200 Cahuenga Utility Infrastructure Technical Report: Water* (Water Infrastructure Report), prepared for the Project by KPFF Consulting Engineers in November 2022, and the *1200 Cahuenga Utility Infrastructure Technical Report: Wastewater* (Wastewater Infrastructure Report), prepared for the Project by KPFF Consulting Engineers in November 2022. The Water Infrastructure Report, and the Wastewater Infrastructure Report, are included as Appendix M.1, and Appendix M.2, to this IS/MND, respectively, and their findings, conclusions, and recommendations are incorporated by reference herein.

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if a project would require or result in the relocation or construction of water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities to such a degree that the construction or relocation of which could cause significant environmental effects.

Water Facilities

The LADWP currently supplies water to the Project Site. LADWP is responsible for ensuring that water demand within the City is met and that State and federal water quality standards are achieved. The LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes more than 7,336 miles of pipes, and more than 115 storage tanks and reservoirs.[242] Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP treats approximately 600 million gallons per day (gpd).[243] As detailed below in response to Question XIX(b), the Project's domestic water supply demand would be 8,539 gpd. Thus, implementation of the Project is not expected to measurably reduce LAAFP's capacity, and as such, no new or expanded water treatment facilities would be required. Moreover, as discussed below, the Project's anticipated water demand is consistent with demand projected under LADWP's UWMP, therefore, it is anticipated that LADWP would be able to meet the Project's water treatment demand and no new infrastructure associated with the storage of water would be required.

Within the vicinity of the Project Site, there is a 36-inch water main and a 12-inch water main located in Cahuenga Boulevard, and 8-inch water main and an abandoned 4-inch water main on Lexington Avenue, and a 12-inch water main in La Mirada Avenue.[244] The LADWP performed a flow test to evaluate the ability of the existing local water conveyance infrastructure to support the domestic water supply demand of the Project. Based on the results, LADWP has confirmed that the domestic water supply needs of the Project can be met by the existing local water delivery infrastructure and no upgrades to the water mains in the vicinity would be required.[245] However, although a development's domestic water supply demand is the main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure and are, therefore, the primary means for analyzing infrastructure capacity. The water service map provided by the City shows four hydrants within the vicinity of the Project Site. Based on fire flow

242 Los Angeles Department of Water and Power Website, About Us, Water Facts & Figures, available at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?, accessed: December 2022.

243 Better Buildings U.S. Department of Energy website.

244 KPFF Consulting Engineers, 1200 Cahuenga Utility Infrastructure Technical Report: Water, November 2022, page 5. See Appendix M.1 of this IS/MND.

245 City of Los Angeles, Department of Water and Power – Water System, SAR Number 97153, April 4, 2022. See Exhibit 2 of Appendix M.1 of this IS/MND.

standards set forth in Section 57.507.3 of the LAMC, the Project Site falls within high density residential neighborhood commercial, which requires 4,000 gpm from 4 adjacent hydrants flowing simultaneously with a minimum residual pressure of 20 pounds per square inch (psi). The Project would incorporate a fire sprinkler suppression system to reduce or eliminate the demands on public hydrants, which will be subject to Fire Department review and approval during the design and permitting of the Project. Based on Section 94.2020.0 of the LAMC that adopts by reference NFPA 14-2013 including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building would be 1,250 gpm. The LADWP performed a hydraulic analysis of their water system to determine if adequate fire flow is available to the fire hydrants surrounding the Project Site. The hydraulic analysis determined that the four existing hydrants in the vicinity of the Project Site are capable of simultaneously delivering a total of 6,000 gpm with a residual pressure of 20 psi. Based on these results, LADWP confirmed that fire flow demands of the Project can be met by the existing local fire hydrant infrastructure and no upgrades to existing hydrants or new hydrants would be required.[246]

The Project would require construction of new, on-site water distribution lines and connections to the off-site water mains. Construction impacts associated with installation of such distribution lines and connections would be primarily limited to trenching. All on-site water line installation and connection to the existing system would be done in coordination and under the approval of the LADWP and, as such, would comply with all applicable LADWP requirements and policies intended to prevent and limit impacts to existing water service lines and adjacent properties. In addition, pursuant to current LADOT approaches for controlling traffic during construction and as detailed in **PDF TR-1** under Checklist Section XVII, Transportation, a formal Construction Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts and would ensure safe pedestrian and vehicular travel during construction, including during off-site connection to the existing water main facilities.

Based on the above, the expansion of off-site water infrastructure would not be required and the construction of new on-site water distribution infrastructure would not result in significant environmental effects. **Accordingly, impacts would be less than significant and no mitigation measures would be required.**

Wastewater Facilities

As detailed below in response to Question XIX(c), the Project's wastewater would be treated by the Hyperion Water Reclamation Plant (HWRP), which has adequate capacity to serve the Project. Accordingly, it is not anticipated that the Project would require the construction of new wastewater treatment facilities.

Based on available record data provided by the City, there is an 8-inch vitrified clay pipe (VCP) sewer line in La Mirada Avenue beginning at La Mirada Avenue that flows west towards Cahuenga Boulevard; and a 12-inch concrete, 8-inch VCP and a 12-inch VCP sewer line in Cahuenga Boulevard. All three pipes run from the intersection of La Mirada Avenue and Cahuenga

246 City of Los Angeles, Department of Water and Power – Water System, Information of Fire Flow Availability, October 27, 2022. See Exhibit 1 of Appendix M.1 of this IS/MND.

Boulevard, to the intersection of Cahuenga Boulevard and Lexington Avenue. There is a 15-inch concrete and 8- inch VCP sewer line in Lexington Avenue. The 15-inch concrete pipe runs from the intersection of Lexington Avenue and Lillian Way to the intersection of Cahuenga Boulevard and Lexington Avenue. The 8-inch VCP runs from the intersection of Lexington Avenue and Lillian Way and terminates upstream on Lexington Avenue.[247]

As detailed in response to Question XIX(c), the Project would result in a wastewater flow from the Site of 152,539 gpd. Wastewater generated by the Project would be split between the sewer mains located in Lexington Avenue, La Mirada Avenue, and Cahuenga Boulevard respectively. The existing capacity of the 8-inch sewer line in Lexington Avenue is approximately 0.869 cubic feet per second (cfs) (0.56 MGD); the proposed sewerage flow into the main is approximately 0.0041 cfs(0.003 MGD). The existing capacity of the 8-inch sewer line in La Mirada Avenue is approximately 1.00 cfs (0.64 MGD); the proposed sewerage flow into the main is approximately 0.22 cfs (0.144 MGD). The existing capacity of the 12-inch main in Cahuenga Boulevard is 4.28 cfs (2.76 MGD); the proposed sewerage flow into the main is approximately 0.0037 cfs (0.002 MGD). The Project sewerage discharge would account for 0.06 percent, 22 percent, 0.08 percent, of the available capacity of Lexington Avenue, La Mirada Avenue, and Cahuenga Boulevard, respectively. Pursuant to LAMC Section 64.15, BOS Wastewater Engineering Division made a preliminary analysis of the local and regional sewer conditions to determine if available wastewater conveyance capacity existing to serve the Project's projected generation of wastewater. The BOS's approach consisted of a worst-case scenario envisioning peak demands from the relevant facilities occurring simultaneously on the wastewater system and a combination of flow gauging data and computed results from the City's hydrodynamic model were used to project current and future impacts due to additional sewer discharge. Based on the Project's projected wastewater flow and the worst-case scenario modeling conducted, BOS has approved the Project to discharge up to 152,539 gpd of wastewater.[248] Therefore, it is anticipated that the Project would not require the expansion of existing or construction of new regional or local wastewater conveyance infrastructure.

The Project would require construction of new on-site wastewater collection infrastructure to serve the new development, including a sewage ejector proposed for the Project, as well as potential upgrade and/or relocation of existing on-site wastewater infrastructure. Installation of on-site wastewater infrastructure would be conducted in accordance with applicable plumbing codes. Although no upgrades to the public main are anticipated, minor off-site work along the Project frontage may be required in order to connect to the public main. Construction impacts associated with installation of new on-site wastewater infrastructure and connections would be primarily limited to trenching. All work would be performed in consultation and under the approval of the BOS and, as such, would comply with all applicable BOS requirements and policies intended to prevent and limit impacts to existing sewer lines and adjacent properties. In addition, pursuant to current LADOT approaches for controlling traffic during construction and as detailed in **PDF TR-1** under Checklist Section XVII, Transportation, a formal Construction Management Plan would

247 KPFF Consulting Engineers, 1200 Cahuenga Utility Infrastructure Technical Report: Wastewater, November 2022, pages 3-4.

248 City of Los Angeles, Bureau of Engineering, Sewer Capacity Availability Request, Sanitation SCAR ID: 70-6338-1122, November 8, 2022. See Exhibit 1 of Appendix M.2 of this IS/MND.

be implemented to reduce any temporary pedestrian and traffic impacts and would ensure safe pedestrian and vehicular travel during construction, including during off-site connection to the existing wastewater facilities.

Based on the above, the expansion of off-site wastewater infrastructure would not be required and the construction of new on-site wastewater infrastructure would not result in significant environmental effects. **Accordingly, impacts would be less than significant and no mitigation measures would be required.**

Stormwater Drainage Facilities

Refer to Question c(iii) in Section X, Hydrology and Water Quality, above for a discussion of stormwater drainage facilities. As discussed there, all building roof drains would be directed to underground drainage devices, all hardscape surfaces would sheet flow toward nearby area drains and would be directed to underground drainage devices capable of treating and storing the 85th percentile rain event. As a result, there would be a decrease in stormwater runoff from the Site as compared to existing conditions.[249] As such, stormwater runoff from the Project Site would not exceed the capacity of the existing or planned stormwater drainage systems and would not be expected to require the construction of new facilities. However, should the City determine improvements to the stormwater drainage system are necessary during the normal permit review process, the Applicant would be responsible for the improvements, and such improvements would be conducted as part of the Project either on-site or offsite within the right-of-way, and as such, any related construction activities would be temporary and of short duration. Therefore, the construction of new stormwater drainage facilities would not result in significant environmental effects. **Accordingly, impacts related to the construction of new stormwater facilities would be less than significant and no mitigation measures would be required.**

Electric Power Facilities

The LADWP would supply the Project from the existing electrical system. As detailed in response to Question VI(a), LADWP has confirmed that electric service and infrastructure is available in the vicinity of the Project Site and would be provided to the Project in accordance with LADWP Rules and Regulations and that the estimated power requirement of the Project has been accounted for in the planned growth of the power system.[250] As such, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand and no new sources of electricity or off-site generation or transmission facilities would be required to support the Project.

However, the Project would require the installation of new on-site electrical distribution facilities and connection to the off-site electrical system. Construction impacts associated with installation

249 KPFF Consulting Engineers, 1200 Cahuenga Project Technical Report: Water Resources, November 2022, page 25. See Appendix I of this IS/MND.

250 City of Los Angeles, Department of Water and Power, Letter Correspondence from Daniel Rostrom, Electrical Engineer, Customer Station Design, Will Serve: 1200 N. Cahuenga Blvd, Los Angeles, CA 90038 – Office and Retail Space with One Level of Subterranean and Above Grade, October 7, 2022. See Exhibit 1 in Appendix E of this IS/MND.

of such distribution lines and connections would be primarily limited to trenching. All on-site electrical line installation and connection to the existing system would be done in coordination and under the approval of the LADWP and, as such, would comply with all applicable LADWP requirements and policies intended to prevent and limit impacts to existing electrical systems and adjacent properties. In addition, pursuant to current LADOT approaches for controlling traffic during construction and as detailed in **PDF TR-1** under Checklist Section XVII, Transportation, a formal Construction Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts and would ensure safe pedestrian and vehicular travel during construction, including during off-site connection to the existing electrical facilities.

Based on the above, the expansion of off-site electric power sources and infrastructure would not be required and the construction of new on-site electric power distribution facilities would not result in significant environmental effects. **Accordingly, impacts would be less than significant and no mitigation measures would be required.**

Natural Gas Facilities

SoCalGas would supply the Project from the existing natural gas facilities. As detailed in response to Question VI(a), SoCalGas has confirmed that natural gas supply infrastructure is available in the vicinity of the Project Site and that service would be provided in accordance with SoCalGas policies and rules on file with the California Public Utilities Commission.[251] SoCalGas notes that the availability of supplies is based upon natural gas supply conditions and is subject to change; however, as discussed in Question VI(a), the Project's operational natural gas demand would represent an insignificant percentage of SoCalGas' available supplies. Therefore, it is expected that the Project would not require new or expanded sources of natural gas or off-site natural gas storage and pipeline infrastructure.

However, the Project would require construction of new, on-site gas distribution lines to serve the new buildings. Construction impacts associated with installation of on-site natural gas distribution lines would be primarily limited to trenching. All on-site natural gas line installation and connection to the existing system would be done in coordination and under the approval of the SoCalGas and, as such, would comply with all applicable SoCalGas requirements and policies intended to prevent and limit impacts to existing natural gas facilities and adjacent properties. In addition, pursuant to current LADOT approaches for controlling traffic during construction and as detailed in **PDF TR-1** under Checklist Section XVII, Transportation, a formal Construction Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts and would ensure safe pedestrian and vehicular travel during construction, including during off-site connection to the existing natural gas facilities.

Based on the above, the expansion of off-site natural gas supplies, storage, and infrastructure would not be required and the construction of new on-site natural gas distribution facilities would

[251] Southern California Gas Company, Letter Correspondence from Jason Sum, Planning Associate, Will Serve – 1200 N. Cahuenga Blvd., Los Angeles, CA, October 19, 2022. See Exhibit 2 in Appendix E of this IS/MND.

not result in significant environmental effects. **Accordingly, impacts would be less than significant and no mitigation measures would be required.**

Telecommunication Facilities

Construction-related activities, including grading and excavation, could encroach on existing on-site telecommunication facilities. However, before construction begins, the Project Applicant would be required to coordinate with applicable regulatory agencies and telecommunication providers to locate and avoid or implement the orderly relocation of telecommunication facilities that need to be removed or relocated. In addition, pursuant to current LADOT approaches for controlling traffic during construction and as detailed in **PDF TR-1** under Checklist Section XVII, Transportation, a formal Construction Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts and would ensure safe pedestrian and vehicular travel during construction, including during off-site connection to off-site telecommunication facilities. Therefore, the relocation of telecommunication facilities would not result in significant environmental effects. Furthermore, telecommunication services are provided by private companies, the selection of which is at the discretion of the Applicant and/or the successor on an ongoing basis. Upgrades to existing telecommunication facilities and construction of new facilities to meet the demand of users during operation would be determined by providers and would be subject to its own environmental review. **Accordingly, impacts to telecommunication facilities would be less than significant and no mitigation measures would be required.**

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

Less Than Significant Impact. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers.

The City's water supply primarily comes from the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California (MWD), which is obtained from the Colorado River Aqueduct, and to a lesser degree from local groundwater sources. LADWP's *2020 Urban Water Management Plan* (2020 UWMP) confirmed that despite an increase in population of over one million people, over the last 20 years, the City's water demand has been reduced by 29 percent; with the average water usage below the average usage in the 1970s.[252] The City is also focused on increasing locally produced water supplies, including conservation, water use efficiency, stormwater recycling, and maximizing water reuse from the Hyperion Water Reclamation Plant (Operation NEXT), and will continue to pursue and/or investigate alternative water supply options, such as water transfers, groundwater banking, brackish groundwater recovery, and seawater desalination. Based on these approaches, the 2020 UWMP projects future water demand within the City under single-dry years, average, and

252 City of Los Angeles, Department of Water and Power, 2020 Urban Water Management Plan, Certified May 25, 2021, page ES-3, website: https://www.ladwp.com/cs/groups/ladwp/documents/pdf/mdaw/nzyy/~edisp/opladwpccb762836.pdf, accessed November 2021.

multiple-dry years hydrological conditions through the 2045 planning horizon year and identifies existing and potential supplies available to continue to meet demand. Projected future water demands and available supply amounts for the City are presented in Table 4.36, *LADWP Water Supply and Demand Projections*.

Table 4.36
LADWP Water Supply and Demand Projections

Hydrological Condition	2025 (AFY)	2030 (AFY)	2035 (AFY)	2040 (AFY)	2045 (AFY)	Change Over Planning Period (AFY)
Single-Dry Years						
Total Supplies	674,700	693,200	712,700	732,700	746,000	72,000
Total Demands	674,700	693,200	712,700	732,700	746,000	72,000
Average Years						
Total Supplies	642,600	660,200	678,800	697,800	710,500	67,900
Total Demands	642,600	660,200	678,800	697,800	710,500	67,900
Multiple-Dry Years (Year 1)						
Total Supplies	657,900	675,800	694,900	714,400	727,400	69,500
Total Demands	657,900	675,800	694,900	714,400	727,400	69,500
Multiple-Dry Years (Year 2)						
Total Supplies	661,700	679,700	698,900	718,500	731,500	69,800
Total Demands	661,700	679,700	698,900	718,500	731,500	69,800
Multiple-Dry Years (Year 3)						
Total Supplies	674,800	693,200	712,800	732,700	746,000	71,200
Total Demands	674,800	693,200	712,800	732,700	746,000	71,200
Multiple-Dry Years (Year 4)						
Total Supplies	661,600	679,600	698,900	718,400	731,500	69,900
Total Demands	661,600	679,600	698,900	718,400	731,500	69,900
Multiple-Dry Years (Year 5)						
Total Supplies	655,700	673,600	692,600	712,000	724,900	69,200
Total Demands	655,700	673,600	692,600	712,000	724,900	69,200

AFY = acre-feet per year
1 *Source: City of Los Angeles, Department of Water and Power, 2020 Urban Water Management Plan, Certified May 25, 2021, Exhibits ES-R, ES-S, and ES-T, pages ES-20 through ES-24.*

During construction, water supplies would be required for dust control, cleaning of equipment, and excavation/export, removal, and re-compaction of soil. As described above in Question XIX(a), a conservative estimate of construction water use ranges from 1,000 to 2,000 gpd. This water demand would be significantly less than the Project's operational demand, which, as described below, would be within the supply capabilities of the provider during normal, dry, and multiple-dry years. Furthermore, this demand would be similar to the projected demand of 1,800 gpd for the existing use during its operation and would, accordingly, be partially, if not entirely, offset by the removal of existing uses. As such, it is anticipated that the water supply demand of Project construction would be adequately met through existing water supplies.

Based on Bureau of Sanitation (BOS) sewer generation rates, the Project's Water Infrastructure Report projects that operation of the Project would require 8,539 gpd (9.6 acre-feet per year [AFY]) to meet domestic demand. As shown in Table 4.36, annual water demand within the City

is projected to increase over the planning period by between 67,200 AFY and 72,000 AFY. The Project's estimated 9.6 AFY demand would represent between 0.014 percent and 0.013 percent of the projected increase in annual water demand of between 67,200 AFY and 72,000 AFY from 2025 to 2045. Furthermore, the Project's operational demand would be partially offset by the removal of existing uses, which were estimated to be 1,800 gpd during its operation, resulting in a net water supply demand of 6,739 gpd, or 7.5 AFY, which would represent between 0.011 percent and 0.010 percent of LADWP's projected increase in annual water demand. Moreover, as also shown in Table 4.36, LADWP projects sufficient water supplies to meet all demands through the planning period under all hydrological conditions. As detailed in Checklist Section XIV, Population and Housing, the employment growth associated with the Project would be consistent with the forecasted growth for the City by 2045. Accordingly, the Project's water demand has been accounted for within LADWP's projections and would not exceed the water demand estimates of the 2020 UWMP.

In addition, the Project water demand of the Project is conservative as the BOS rates do not account for any water saving features that may be implemented by development projects. In accordance with Title 20 and 24 of the California Administrative Code, and as required by LAMC Sections 122.00 - 122.10 and the City's Green Building Code Section 99.4.303, the Project would be required to implement water saving features to reduce the amount of water used by the Project including high-efficiency toilets, low-flow showerheads and faucets, high-efficiency clothes washers, and high-efficiency dish washers. All fixtures would be required to meet applicable flush volumes and flow rates. The Project would also be required to adhere to the City's Irrigation Guidelines and utilize smart irrigation with automatic sensors to determine when irrigation is needed and when irrigation should be suspended due to rain or wind conditions. These features would reduce the projected water demand of the Project.

As such, the Project would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple-dry years. **Therefore, impacts would be less than significant and no mitigation measures would be required.**

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

Less Than Significant Impact. The Project Site is located within the Hyperion Sewer System Service Area, which is operated and maintained by the City's BOS. The existing design capacity of the Hyperion Sewer System Service Area is approximately 550 million gallons per day (consisting of 450 MGD at the Hyperion Water Reclamation Plant (HWRP), 80 MGD at the Donald C. Tillman Water Reclamation Plant, and 20 MGD at the Los Angeles–Glendale Water Reclamation Plant).[253] Wastewater from the Project Site would be conveyed from the Project Site via the City's existing wastewater infrastructure to the HWRP. The HWRP treats an average daily

253 City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer System Management Plan Hyperion Sanitary Sewer System, January 25 2019.

flow of 300 million gallons per day (mgd) in dry weather.[254] This equals a typical remaining capacity of 150 mgd of wastewater able to be treated at the HWRP.

Wastewater generation would occur incrementally throughout construction of the Project as a result of construction workers on-site. However, construction workers would utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Additionally, construction of the Project would replace an existing use which was estimated to generate approximately 1,800 gpd of wastewater during its operation.[255] As such, wastewater generation from Project construction activities is not anticipated to cause any increase in wastewater flows, and would represent a decrease in wastewater flow produced at the Site as compared to operation of the existing use.

Operation of the Project would generate wastewater flows related to the proposed uses, as well as a result of the Project's sewage ejector. A sewage ejector operates similarly to a groundwater sump pump and is intended to store sewage, including liquids and solids, until its design volume is reached, at which point the stored volume of sewage is pumped to municipal sewer lines located at a higher elevation. According to the Project's Wastewater Infrastructure Report, operation of the Project would result in a wastewater flow from the Site of 152,539 gpd, including the Project's sewer ejector design volume of 144,000 gpd. This volume of wastewater would represent 0.02 percent of the total design capacity Hyperion Sewer System Service Area and 0.1 percent of the remaining capacity of the HWRP.

Based on the above, the Project would result in a determination by BOS that it has adequate capacity to serve the Project's projected demand in addition to their existing commitments. **As such, impacts would be less than significant and no mitigation measures would be required.**

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

Less Than Significant Impact. The Los Angeles Bureau of Sanitation and Environment (LASAN) manages solid waste collection in the City, which involves public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. Refuse from single-family residential and small (fewer than four units) multifamily residential uses is collected by LASAN and disposed of at City-operated recycling and transfer stations. Waste generated by large multifamily structures, commercial and industrial businesses (e.g., the proposed Project), and construction, is collected by private contractors and disposed of at a landfill operated by the County or a private company.

Landfill availability is limited by several factors, including: (1) restrictions to accepting waste generated only within a particular landfill's jurisdiction and/or wasteshed boundary, (2) tonnage permit limitations, (3) types of waste, and (4) operational constraints. Non-hazardous municipal

254 KPFF Consulting Engineers, 1200 Cahuenga Utility Infrastructure Technical Report: Wastewater, November 2022, page 8.

255 KPFF Consulting Engineers, 1200 Cahuenga Utility Infrastructure Technical Report: Wastewater, November 2022, Table 1 – Estimated Existing Wastewater Generation, page 4.

solid waste is disposed of in Class III landfills, while inert waste[256] such as construction and demolition (C&D) waste, yard trimmings, and earth-like waste are disposed of in inert waste landfills. The County continually evaluates landfill disposal needs and capacity through preparation of the Los Angeles County Countywide Integrated Waste Management Plan (CoIWMP) Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity. Based on the most recent 2019 CoIWMP Annual Report, the remaining total disposal capacity for the County's Class III landfills is estimated at 148.4 million tons as of December 2019. Most commonly, solid waste collected within the City is disposed of at the Sunshine Canyon Landfill. The Sunshine Canyon Landfill has a permitted intake of 12,100 tons per day and, based on its average daily intake of 6,919 tons per day, has capacity for an additional 5,181 tons per day.[257] The 2019 CoIWMP estimates that it has a remaining capacity of 59.16 million tons and a remaining life of 18 years.[258] The Azusa Land Reclamation facility is the only permitted inert waste landfill in the County that has a full solid waste facility permit; the landfill had 58.84 million tons of remaining capacity and an average daily disposal rate of 854 tons per day as of December 2019.[259]

Under state law (AB 939, as amended by AB 341), jurisdictions are currently required to meet a solid waste diversion goal of 75 percent. Under the City's RENEW LA Plan, adopted in February 2006, the City committed to reaching "zero waste." The goal of zero waste, as defined by the RENEW LA Plan, is to reduce, reuse, recycle, or convert the resources currently going to disposal so as to achieve an overall diversion rate of 90 percent or more by the year 2025 and becoming a zero waste city by 2030.[260] To this end, the City of Los Angeles implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and C&D waste recycling (also required by SB 1374). Using calculation methodology adopted by the state, the City achieved a 76.4 percent diversion rate by 2012.[261]

Construction

Construction debris would consist primarily of debris from the demolition of 8,941 square feet of the existing building, which would be disposed of as inert waste. In addition, construction activities generate a variety of scraps and wastes, with the majority of recyclables being wood waste, drywall, metal, paper, and cardboard. The construction of the Project is estimated to generate a

256 Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

257 County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan, 2019 Annual Report, September 2020, Appendix E-2, Table 4: Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.

258 County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan, 2019 Annual Report, September 2020, Appendix E-2, Table 4: Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.

259 County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan, 2019 Annual Report, September 2020, Appendix E-2, Table 4: Remaining Permitted Disposal Capacity of Existing Solid Waste Disposal Facilities in Los Angeles County.

260 City of Los Angeles, Bureau of Sanitation, Solid Waste Integrated Resources Plan – A Zero Waste Master Plan, October 2013, Final Adoption, April 2015.

261 City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013, page 3.

total of 411 tons of demolition debris[262] and 146 tons of construction waste,[263] for a total of 557 tons of C&D waste requiring disposal.

Pursuant to the requirements of the Citywide Construction and Demolition Waste Recycling Ordinance (Ordinance No. 181519), all haulers and contractors responsible for handling C&D waste must obtain a Private Waste Hauler Permit from LASAN prior to collecting, hauling and transporting C&D waste, which can only be taken to City-certified C&D processing facilities. In accordance with the requirements of AB 939 and SB 1374, which mandate diversion of construction and demolition waste through salvaging, recycling, and reuse, it is assumed that 75 percent of the Project's construction waste would be diverted from disposal. Accordingly, the Project would result in 139 tons of construction waste that would require disposal at an inert waste landfill. Based on Azusa Land Reclamation's 58.84 million tons of remaining capacity, there would be sufficient capacity to serve the construction waste disposal needs of the Project. In addition, the Project would export a total of 12,678 cy of soil export for disposal. Based on Sunshine Canyon's 59.16 million tons of remaining capacity, there would be sufficient capacity to serve the soil export disposal needs of the Project. Based on the available capacity and the required diversion requirements, construction of the Project 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, impacts during construction would be less than significant and no mitigation measures would be required.**

Operation

As detailed in response to Question XIV(a), the Project is expected to create 301 jobs at the Project Site. Based on the City's per-employee solid waste generation rates, the Project would generate 3,170 pounds (1.6 tons) of solid waste per day[264] that would require disposal at a Class III landfill. Furthermore, this volume of solid waste is conservative and does not account for the effectiveness and new technologies of recycling efforts, which the Project would be required to implement per AB 939/AB 341. As previously detailed, the City is required by AB 939/AB 341 to divert 75 percent of solid waste generated within the City from landfill disposal. The City's RENEW LA Plan has also set a goal of 90 percent diversion by 2025 and zero waste by 2030. Accordingly, the estimated volume of solid waste that would be generated by operation of the Project and that would require disposal at a Class III landfill would be reduced to 0.4 tons per day. Based on Sunshine Canyon Landfill's permitted daily capacity of 12,100 tons per day, remaining daily capacity of 5,181 tons per day, remaining permitted capacity of 59.16 million tons, and remaining lifetime of 18 years, there would be sufficient capacity to serve the disposal needs of the Project.

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262 A building demolition debris generation rate of 0.046 tons per square-foot was used. Source: CalEEMod User Guide Appendix A, page 13. 8,941 square feet of demolition x 0.046 tons per square-foot = 411 tons.

263 A construction waste generation rate of 3.89 pounds per square-foot for nonresidential construction was used. Source: USEPA Report No. EPA A530-98-010, Characterization of building Related Construction and Debris in the United States, July 1998. 75,262 square feet of nonresidential construction x 3.89 pounds per square-foot = 292,769 pounds (146 tons).

264 Each employee in the City generates solid waste at a rate of 10.53 pounds per day. Source: City of Los Angeles, L.A. CEQA Thresholds Guide, 2006. 301 employees x 10.53 pounds/employee/day = 3,170 pounds per day.

Based on the available capacity and the required diversion requirements, operation of the Project 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, impacts would be less than significant during operation and no mitigation measures would be required.**

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management is guided by AB 939, which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 requires that localities conduct a Solid Waste Generation Study and develop a Source Reduction and Recycling Element. In addition, the Solid Waste Integrated Resources Plan (or "Zero Waste Plan" adopted by LASAN) provides an outline of the policies, programs, infrastructure, regulations, incentives, new green jobs, technology, and financial strategies necessary to achieve the City's goal of becoming a "zero waste" city by the year 2030. The SWIRP also specifies goals, objectives, and programs for achieving AB 939. The General Plan Framework Element supports AB 939 and its goals address many of the programs the City has already implemented to divert solid waste from disposal facilities, including source reduction programs and recycling programs. The City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687) requires that development projects include on-site trash and recycling areas. Additionally, the Project would be required to comply with CALGreen Code requirements for waste reduction measures for the operation of the Project.

The Project would generate solid waste that is typical of a commercial office development and would be required to be consistent with all federal, state, and local statutes and regulations regarding proper disposal. Additionally, the amount of solid waste that would be generated by the Project would be further reduced through source reduction and recycling programs (as discussed above). Therefore, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. **As such, Project impacts would be less than significant and no mitigation measures would be required.**

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. A significant impact could occur if a project located in or near a state responsibility area or within land classified as a very high fire hazard severity zone were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan.

The Project Site is not located in or near a state responsibility area or within land classified as a very high fire hazard severity zone. The Project Site is located in a fully developed urban area, located near Santa Monica Boulevard, which is a designated primary disaster route that may be utilized for an evacuation route during an emergency.[265] The Project constitutes a private development located on private land and does not propose any alteration to the public rights-of-

[265] Los Angeles County Department of Public Works, Disaster Route Maps, City of Los Angeles Central Area and City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles, Adopted November 1996.

way. No full road closures along N. Cahuenga Boulevard or Lexington Avenue during construction are anticipated. However, if lane closures on local streets adjacent to the Project Site are necessary during construction, the remaining travel lanes would be maintained in accordance with the Project's construction management plan that would be implemented to ensure adequate emergency access and circulation. Regarding operations, the Project would comply with access requirements from the Los Angeles Fire Department (LAFD) and would not impede emergency access within the Project vicinity. Therefore, the Project would not cause an impediment along the City of Los Angeles's designated disaster routes or impair the implementation of the City of Los Angeles's emergency response plan. **Impacts related to the implementation of the City of Los Angeles's emergency response plan would be less than significant, and no mitigation measures would be required.**

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

No Impact. A significant impact could occur if a project located in or near a state responsibility area or within land classified as a very high fire hazard severity zone were to expose people to exacerbated wildfire risks, and thereby to pollutant concentrations from a wildfire or in the path of the uncontrolled spread of a wildfire.

The Project Site is not located in or near a state responsibility area or within land classified as a very high fire hazard severity zone. The Project Site is located within a highly developed area of the City of Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not within a Very High Fire Hazard Severity Zone,[266] nor is the Project Site or surrounding area within a wildland fire hazard area.[267] Therefore, the Project would not exacerbate wildfire risks and no exposure of Project occupants to pollutant concentrations from a wildfire or to the uncontrolled spread of a wildfire would occur. **Accordingly, no impact would occur and no mitigation measures would be required.**

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

Less Than Significant Impact. A significant impact could occur if a project located in or near a state responsibility area or within land classified as a very high fire hazard severity zone would require the installation or maintenance of associated infrastructure that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment.

The Project Site is not located in or near a state responsibility area or within lands classified as a very high fire hazard severity zone. The Project would involve the demolition of an existing building and construction of a new creative office complex in a highly urbanized area in the Hollywood community of the City of Los Angeles. No roads, fuel breaks, or emergency water sources would

266 City of Los Angeles Department of City Planning, Zone Information & Map Access System, accessed August 2022.

267 City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit D, Selected Wildlife Hazard Areas in the City of Los Angeles, Adopted November 1996.

be installed or maintained. Installation of any required power lines or other utilities would be done in a manner consistent with other construction projects typical of urban development requiring connection to the existing utility grid and infrastructure and in accordance with applicable City of Los Angeles building codes and utility provider policies and would not exacerbate fire risk. **Compliance with all building code, developmental regulations, and utility providers requirements and policies would ensure that the Project would not exacerbate fire risks and impacts would be less than significant and no mitigation measures would be required.**

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

No Impact. A significant impact could occur if a project located in or near a state responsibility area or within lands classified as a very high fire hazard severity zone were to expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope stability, or drainage changes.

The Project Site is not located in or near state responsibility area or within land classified as a very high fire hazard severity zone. Even so, the Project would be required to comply with all developmental regulations and City of Los Angeles building codes with regard to fire safety and would not exacerbate the potential for fire at the Project Site. Any installation of on-site power lines required to provide the Project with electricity and connections to existing power lines would be conducted in coordination and under the supervision of the utility provider. Further, the Project Site and the surrounding vicinity are relatively flat, and no major slopes that would be susceptible to flooding or landslide are located nearby. **Accordingly, the Project would not expose people or structures to such hazards and no impacts would occur and no mitigation measures would be required.**

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

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

No Impact. A significant impact may occur if a project, in conjunction with other related projects in the area of the project site, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together.

The Project is located in an urbanized area and would have no significant and unavoidable impacts with respect to biological resources or cultural resources. The Project would not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. **Therefore, no impact would occur and no mitigation measures are required.**

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

Less Than Significant Impact. A significant impact may occur if a project, in conjunction with other related projects in the area of the project site, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together.

In accordance with CEQA Guidelines Section 15064(h), this IS/MND includes an evaluation of the Project's cumulative impacts. An adequate discussion of a project's significant cumulative impact, in combination with other closely Related Projects, can be based on either: (1) a list of past, present, and probable future related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect. (CEQA Guidelines Section 15130(b)(1)(A)-(B). The lead

agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. Accordingly, all proposed, recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment, when considered in conjunction with the Project, were identified for evaluation.

There are 22 Related Projects as shown in Table 4.37, *List of Related Projects*, in the general vicinity of the Project Site that were identified in the Project's Traffic Assessment. None of these are within direct vicinity of the Project Site (i.e., within 500 feet). The nearest Related Projects include: No. 6, apartments and creative office, approximately 778 feet (0.2 miles) northwest of the Project Site. The rest of the related projects are greater than 1,000 feet away, distances which ensure that any other localized impacts of the Related Projects would not combine with the Project.

Aesthetics

Development of the Project in conjunction with the Related Projects would result in an incremental intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. With respect to aesthetics and views, and shade and shadow impacts, none of the Related Projects are located in proximity to the Project Site such that their development would affect the aesthetic character of the Project Site or its immediate surroundings. There are no scenic or protected views in the area. Views in the immediate area would not be affected by the Project or the nearest Related Project. Development of the Related Projects is expected to occur in accordance with adopted plans and regulations. As per ZI No. 2145 and SB 743, aesthetic impacts "shall not be considered significant impacts on the environment." **Thus, the Project would not be cumulatively considerable. Therefore, cumulative aesthetic impacts would be less than significant.**

Table 4.37
List of Related Projects

No.	Project Location	Land Use	Size
1	1441 N. Wilcox Avenue	Hotel Restaurant Meeting Room	190 rooms 4,463 sf 1,382 sf
2	6201 W. Sunset Boulevard	Palladium Residences Apartment/Condos or Apartments/Condos with Hotel Retail Restaurant	 731 units 598 units 250 rooms 21,000 sf 7,000 sf
3	6230 W. Sunset Boulevard	Apartments Office Retail	200 units 32,100 sf 4,700 sf
4	1525 N. Cahuenga Boulevard	Hotel	69 rooms
5	901 N. Vine Street	Apartments| Restaurant Retail	85 units 4,000 sf 4,000 sf

Table 4.37
List of Related Projects

No.	Project Location	Land Use	Size
6	1301 N. Cole Avenue	Apartments	375 units
7	6409 W. Sunset Boulevard	Hotel Retail	275 rooms 1,900 sf
8	6200 W. Sunset Boulevard	Apartments Restaurant Retail Pharmacy	270 units 1,750 sf 8,070 sf 2,300 sf
9	6332 W. De Longpre Avenue	Academy Square Apartments Office Quality Restaurant High Turnover Restaurant	 200 units 298,000 sf 11,900 sf 4,200 sf
10	6421 W. Selma Avenue	Hotel Restaurant Retail	114 rooms 5,041 sf 1,809 sf
11	1541 N. Wilcox Avenue	Hotel restaurant Meeting Room	190 rooms 4,463 sf 1,382 sf
12	1400 N. Cahuenga Boulevard	Hotel Restaurant Rooftop lounge/bar	220 rooms 2,723 sf 1,440 sf
13	6400 W. Sunset Boulevard	Apartments Retail	200 units 7,000 sf
14	1546 N. Argyle Avenue	Apartments Retail Restaurant	276 units 9,000 sf 15,000 sf
15	1545 N. Wilcox Avenue	Retail/Restaurant/Bar Office	14,900 sf 16,100 sf
16	6050 W. Sunset Boulevard	Sunset Gower Studios Sound Stage/Office	 859,350 sf
17	1400 N. Vine Street	Apartments Affordable Apartments retail	170 units 19 units 16,000 sf
18	6445 W. Sunset Boulevard	Hotel restaurant/Bar	175 rooms 11,400 sf
19	6422 W. Selma Avenue	Apartments	45 units
20	1520 N. Cahuenga Boulevard	Apartments Affordable Apartments High Turnover Restaurant	243 units 27 units 6,805 sf
21	6450 W. Sunset Boulevard	Office Restaurant	431,032 sf 12,386 sf
22	1125 N. Gower Street	Apartments Affordable Apartments	155 units 14 units
Source: Overland Traffic Consultants, Inc. December 2021.			

Agriculture and Forestry Resources

Development of the Project in combination with the Related Projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of forest land or conversion of forest land to non-forest use. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category. The Project Site and the surrounding area are highly urbanized area and do not include any State-designated agricultural lands or forest uses. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts and no cumulative impacts to agricultural or forestry resources would occur.**

Air Quality

In accordance with the SCAQMD methodology, projects that do not exceed the SCAQMD criteria or can be mitigated to less than criteria levels are not significant and do not add to the overall cumulative impact. The Project does not exceed any of the thresholds of significance and therefore is considered less than significant. Additionally, the Project would be in compliance with the assumptions of the AQMP. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts and cumulative air quality emissions would be less than significant.**

As with the Project, construction of the related projects is expected to involve standard construction activities and potential construction odors would include diesel exhaust emissions, roofing, painting, and paving operations. There would be situations where construction activity odors would be noticeable by residents nearby each of the related construction sites. However, similar to the Project, the related projects are also required to comply with SCAQMD Rule 402, and these temporary odors are typical of construction activities and are generally not considered to be objectionable. Additionally, these odors would dissipate rapidly from the source with an increase in distance and construction activities would be subject to applicable construction and air quality regulations (including proper maintenance of machinery) in order to minimize engine emissions. Construction of the Project is not expected to contribute to substantial odors at sensitive uses near any of the other related construction sites in the local vicinity. **Therefore, cumulative odor impacts resulting from construction activities would not be considerable or significant.**

Biological Resources

The Project would not impact any protected trees. The Project would have no impact upon biological resources. Development of the Project in combination with the Related Projects would not significantly impact wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFG or the USFWS. No such habitat occurs in the vicinity of the Project Site or Related Projects due to the existing urban development. Development of any of the Related Projects would be subject to the City of Los

Angeles Protected Tree Ordinance. The Related Projects have no habitats, as they are infill developments. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative impacts to biological resources will be less than significant.**

Cultural Resources

The Project and Related Projects would comply with applicable federal, state, and city regulations that would preclude significant cumulative impacts regarding cultural resources. This resource area is site and locally specific so that each Related Project would need to be evaluated within its own site-specific context. In addition, any Related Project within a historic district or affecting a historic resource would require a historic resource evaluation to ensure that removal of an existing building, addition of a new building, and/or conversion would not impact the historic resource in the area. The Project will have no impact on a historic resource on the Project Site and a less than significant impact on off-site historic resources, archeological resources, paleontological resources, and human remains, with implementation of required regulatory compliance measures. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative impacts on cultural resource will be less than significant.**

Energy

Each of the Related Projects would be evaluated within its own context with consideration of energy conservation features that could alleviate electrical demand. Each Related Project would be required to be in compliance with Title 24 of the California Code of Regulations (CCR) (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the Los Angeles Green Building Code. Further, each Related Projects would need to be consistent with the building energy efficiency requirements of Title 24 as well as how SCG serves each location with its existing distribution infrastructure. Finally, each Related Projects would need to be consistent with how the LADWP serves each location with its existing distribution infrastructure.

LADWP and SCG undertake system expansions and secure the capacity to serve their service areas and take into consideration general growth and development. Operation would result in the irreversible consumption use of non-renewable natural gas and would thus limit the availability of this resource. However, the continued use of natural gas would be on a relatively small scale and consistent with regional and local growth expectations for the area. The Related Projects would be in compliance with the City's Green Building Ordinance (for the City of Los Angeles) and would thus exceed the standards in Title 24 of the CCR requiring building energy efficiency standards.

All forecasted growth would incorporate design features and energy conservation measures, as required by Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the LA Green Building Code, which would reduce the impact on natural gas demand. It is also anticipated that future developments would upgrade distribution facilities, commensurate with their demand, in accordance with all established policies and

procedures. There would be sufficient statewide supplies to accommodate the statewide requirements from 2018-2030. Thus, there is a plan to secure natural gas supplies to meet demand. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative energy impacts would be less than significant.**

Geology and Soils

Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Project and any of the Related Projects. Similar to the Project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the Related Projects would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the Project's geology and soils impacts concluded that Project impacts would be less than significant levels. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative geology and soil impacts would be less than significant.**

Greenhouse Gas Emissions

A cumulatively considerable impact would occur where the impact of the Project in addition to the related projects would be significant. However, in the case of global climate change, the proximity of the Project to other GHG emission generating activities is not directly relevant to the determination of a cumulative impact because climate change is a global condition. According to CAPCOA, "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective." As noted above, the analysis of the Project's impact is a cumulative analysis and no further discussion is required. **Given that the analysis above found that the Project GHG impacts would be less than significant, the Project's cumulative impacts would also be considered less than significant.**

Hazards and Hazardous Materials

Hazards are site-specific and there is little, if any, cumulative hazardous relationship between the Project and any of the Related Projects. Similar to the Project, potential impacts related to hazards would be assessed on a case-by-case basis and, if necessary, the applicants of the Related Projects would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the Project's hazards and hazardous materials impact concluded that Project impacts would be less than significant levels. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative hazard and hazardous materials impacts would be less than significant.**

Hydrology and Water Quality

The Project Site and the surrounding areas are served by the existing City storm drain system. Runoff from the Project Site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the Related Projects would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the Project Site and the Related Projects, since this part of the

City is already fully developed with impervious surfaces. Under the requirements of the Low Impact Development Ordinance, each Related Project will be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing 3⁄4 inch of rainfall in a 24-hour period. Mandatory structural BMPs in accordance with the NPDES water quality program will therefore result in a cumulative reduction to surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, the Project would not make a cumulatively considerable contribution to impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative water quality impacts would be less than significant.**

Land Use and Planning

Compliance with City's land use standards would ensure that any cumulative impacts related to land use would be less than significant. Further, all Related Projects would be individually evaluated for consistency with applicable land use standards. None of the Related Projects would physically divide an established community or conflict with a habitat conservation plan. **The Project would not make a cumulatively considerable contribution to land use planning, and cumulative land use impacts would be less than significant.**

Mineral Resources

Development of the Project in combination with the Related Projects would not result in the loss of availability of mineral resources. The Project Site and the surrounding area are highly urbanized area and do not include any MRZ zones. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and no cumulative impacts to mineral resources would occur.**

Noise

Construction Noise

For construction noise impacts, only the immediate area surrounding a specific development site is included in the cumulative context as the immediate area would be the most affected by construction noise. Typically, if a development site is 500 feet or more away from another site then noise levels would have attenuated to a point that they would not combine to produce a cumulative noise impact. The nearest Related Projects include: No. 6, apartments and creative office, approximately 778 feet (0.2 miles) northwest of the Project Site. **Therefore, construction noise would not combine to result in a cumulatively considerable construction noise impact.**

Operational Noise

Similar to construction noise, it is unlikely for stationary noise sources to result in a cumulatively considerable noise impact, unless related projects are located within the close vicinity of the

Project The nearest Related Projects include: No. 6, apartments and creative office, approximately 778 feet (0.2 miles) northwest of the Project Site and operational stationary noise would not combine to create a cumulatively considerable stationary noise impact. For operational/roadway related noise impacts, the traffic study accounted for trip generation from related projects which was used to model mobile noise levels. No mobile noise impacts have been identified. **Therefore, a cumulatively considerable noise impact would not occur related to operational noise.**

Construction Vibration

For construction vibration impacts, only the immediate area surrounding a specific development site is included in the cumulative context as the immediate area would be the most affected by construction noise. Typically, if a development site is 50 feet or more away from another site, vibration levels would have attenuated to a point that they would not combine to produce a cumulative vibration impact. The nearest Related Projects include: No. 6, apartments and creative office, approximately 778 feet (0.2 miles) northwest of the Project Site. **Construction vibration levels would not combine to result in a cumulatively considerable construction vibration impact.**

Operational Vibration

Urban infill developments do not typically generate significant operational vibration levels. Related Project and Project vehicle trips could generate vibration, although similar to the existing condition, roadway vibration from passenger vehicles would not be perceptible outside of the roadway right-of-way. A significant operational vibration impact would not occur. **Therefore, operational vibration levels would not combine to result in a cumulatively considerable vibration impact.**

Population and Housing

The Related Projects would introduce additional residential and other related uses to the City of Los Angeles. Any residential Related Projects would result in direct population growth. The Related Projects growth would not exceed the projected growth because SCAG can update its projections after the 2020 Census when some of the Related Projects are in operation. The net increase of employees is not cumulatively considerable as there are no thresholds for employee impacts. **Because the Project would not displace any residents, the Project's population growth would not be cumulatively considerable**. **Therefore, the Project's cumulative impacts to population and housing would be less than significant.**

Public Services

Fire

Given the geographic range of the Related Projects, they would be served by Fire Station No. 27 the same as the Project Site.[268] The Project, in combination with the Related Projects, could increase the demand for fire protection services in the Project area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the Project and Related Projects would contribute. Similar to the Project, each of the Related Projects in the City of Los Angeles would be individually subject to LAFD review and would be required to comply with all applicable fire safety requirements of the LAFD in order to adequately mitigate fire protection impacts. Specifically, any Related Projects that exceeded the applicable response distance standards described above would be required to install automatic fire sprinkler systems in order to mitigate the additional response distance. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas. Nevertheless, the development of any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. **On this basis, the Project would not make a cumulatively considerable contribution to fire protection services impacts, and as such cumulative impacts on fire protection would be less than significant.**

Police

The Project, in combination with the Related Projects, would increase the demand for police protection services in the Project area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Project and Related Projects would contribute. In addition, each of the Related Projects would be individually subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. Furthermore, each of the Related Projects would likely install and/or incorporate adequate crime prevention design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services. To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas. Nevertheless, the siting and development of any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAPD does not currently have any plans for new police stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. **On this basis, the Project would not make a cumulatively**

268 City of Los Angeles Fire Department, Find Your Station Website, accessed: December 2022.

considerable contribution to police protection services impacts, and cumulative impacts on police protection would be less than significant.

Schools

Given the geographic range of the related projects, they would be served by a variety of public schools depending on the location and service boundaries. The Project, in combination with the related projects is expected to result in a cumulative increase in the demand for school services. These related projects would have the potential to generate students that would attend the same schools as students associated with the Project. However, each of the related projects would be responsible for paying mandatory school fees to mitigate the increased demands for school services. Overall, the payment of school fees in compliance with SB 50 would provide full and complete mitigation of school impacts for the purposes of CEQA. **Therefore, the Project's school impacts would not be cumulatively considerable, and cumulative impacts on schools would be less than significant.**

Parks and Recreation

Development of the Project in conjunction with the Related Projects could result in an increase in permanent residents residing in the Project area. Additional cumulative development would contribute to lowering the City's existing parkland to population ratio, which is currently below the preferred standard. However, each of the residential Related Projects is required to comply with payment of Quimby (for condominium units) and other fees, such as the Parks and Recreation Fee (for apartment units). Each residential Related Projects would also be required to comply with the on-site open space requirements of the LAMC. **Therefore, with payment of the applicable recreation fees on a project-by-project basis, the Project would not make a cumulatively considerable impact to parks and recreational facilities and cumulative impacts would be less than significant.**

Library

Given the geographic range of the Related Projects, they would be served by the John C. Fremont Branch Library (1.0 mile southwest of the Project Site), Will & Ariel Durant Branch Library (1.3 miles northwest of the Project Site), and Frances Howard Goldwyn-Hollywood Regional Library (0.6 mile to the north). Development of the Related Projects would likely generate additional demands upon library services. The LAPL has no plans for new or expanded libraries; however, the Related Projects, like the Project, would contribute to the City General Fund, which goes to, among other things, library services. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and impacts related to library facilities would be less than significant.**

Transportation

Conflict with Program Plans

Development of the Project in conjunction with the Related Projects would result in an increase in average daily vehicle trips and peak hour vehicle trips. Each of the Related Projects considered in this cumulative analysis of consistency with programs, plans, policies, and ordinances would be separately reviewed and approved by the City, including a check for their consistency with applicable policies. Collectively, the Project and the Related Projects add high-density development in a major commercial area with high-quality transit options and high levels of pedestrian activity. Therefore, the Project, together with the Related Projects identified in Table 4.37, would neither create inconsistencies nor result in cumulative impacts with respect to the identified programs, plans, policies, and ordinances.

Therefore, Project operation-related and cumulative-related traffic would not conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and Project transportation policy impacts would be less than significant.**

VMT Analysis

A development project would have a cumulative VMT impact if it were deemed inconsistent with 2020-2045 RTP/SCS, the regional plan to reach state air quality and greenhouse gas reduction targets. However, based on the TAG, a project that does not result in a significant VMT impact would be in alignment with the RTP/SCS and therefore, would not result in a cumulative VMT impact. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and the Project would not result in a significant cumulative VMT impact.**

Hazards Due to Geometric Design

The TAG indicates that cumulative impacts for this threshold requires a review of related projects with access points proposed along the same block(s) as a proposed project in order to determine the combined impact and the proposed project's contribution. None of the Related Projects identified in the Traffic Impact Assessment, and provided in Table 4.37, provide access along the same block as the Project. Thus, Related Projects and the Project would not increase hazards due to geometric design features. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and the Project and Related Projects would not result in a cumulative Geometric Design impact.**

Emergency Access

Vehicular access to all parking would be provided from new driveways on the adjacent Local Streets of La Mirada Avenue and Lexington Avenue. No driveways would be introduced on N. Cahuenga Boulevard, a designate Modified Avenue II roadway. There would also be a reduction in the number of driveways onto the city streets. Currently there are two driveways for the Project

Site on Lexington Avenue. One driveway would be removed, one driveway would remain and one new driveway would be constructed. The two existing driveways on La Mirada Avenue would be removed and one driveway would be constructed. By providing one less driveway, the Project would reduce the number of potential hazard points with pedestrians, cyclists and other vehicles. Furthermore, the Project's local street access would be consistent with LADOT driveway placement and location per LADOT Manual of Policies and Procedures, Section 321, Driveway Design. None of the Related Project sites are located within 500 feet of the Project Site and each has access to streets other than La Mirada Avenue and Lexington Avenue. Thus, the Project and related projects would not generate vehicle trips that would threaten the ability of emergency vehicles to access land uses in the project area. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and the Project and Related Projects would not result in a cumulative emergency access impact.**

Tribal Cultural Resources

The Project and Related Projects would comply with AB 52 in which the lead agency for each project would be required to notice tribes that are traditionally and culturally affiliated with the geographic area of the related project sites if the tribe has submitted a written request to be notified. Due to being locally specific, each Related Project would need to conduct a Sacred Lands File search and be evaluated within its own site specific context. The Project would not adversely affect known Tribal Cultural Resources. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative impacts on cultural resources will be less than significant.**

Utilities and Service Systems

Individual sewer and water infrastructure is location and site-specific and made on a case by case basis. Through the 2015 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2040. Demands on water consumption, wastewater generation, and solid waste generation resulting from the Project would be less than significant. Ultimately, the wastewater and water facilities HTP and Los Angeles Aqueduct Filtration Plant (LAAFP) and Sunshine Canyon landfill have adequate capacity to accommodate the project and Related Projects along with the general growth within the City.[269] It is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Related Projects like Project, electricity demand. It is expected that SoCalGas' existing and planned natural gas capacity and supplies will be sufficient to serve the Project's demand**.** Furthermore, telecommunication services are provided by private companies, the selection of which is at the discretion of the Applicant and/or the successor on an ongoing basis. Upgrades to existing telecommunication facilities and construction of new facilities to meet the demand of users is determined by providers and is subject to its own environmental review. **Therefore, the Project's contribution to cumulative wastewater, water, solid waste,**

269 The Countywide Integrated Management Plan 2017 Annual Report concludes that there is current capacity of 55.71 million tons available throughout the County for the disposal of inert waste.

electricity, natural gas, and telecommunications impacts will not be cumulatively considerable and cumulative impacts would be less than significant.

Wildfire

No related project is located within 500 feet of the Project Site and do not share access to La Mirada Avenue and Lexington Avenue. If lane closures are necessary to local streets adjacent to Related Project sites, travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate emergency access and circulation. Regarding operations, the Related Projects, like the Project, would comply with access requirements from the LAFD and would not impede emergency access within the vicinity of each Related Project site. Therefore, the Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan. **Cumulative impacts related to the implementation of the City's emergency response plan would be less than significant**.

All of the Related Project Sites and the Project Site are within urbanized areas of the City and do not include wildlands or fire hazard terrain or vegetation. Therefore, the Project and Related would not exacerbate wildfire risks and no exposure of Project occupants to pollutant concentrations from a wildfire would occur. **Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and no cumulative wildfire impact would occur.**

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

Less Than Significant With Mitigation Incorporated. A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Project would not have significant environmental effects on human beings, either directly or indirectly after mitigation. Mitigation is required to reduce onsite vapors (**MM HAZ-1** through **MM HAZ-3**), reduce construction noise/vibration (**PDF NOI-1**, **PDF NOI-2** and **MM NOI-1 - MM NOI-3**), and reduce potential impacts to tribal cultural resources (**MM TRC-1)**. **Thus, with mitigation, any potentially significant impacts to humans would be less than significant.**

INITIAL STUDY

5.0 MITIGATION AND MONITORING PROGRAM

5.1. INTRODUCTION

This Mitigation Monitoring Program (MMP) has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a "reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." In addition, Section 15097(a) of the State CEQA Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6 and Section 15097 of the State CEQA Guidelines.

The City of Los Angeles is the Lead Agency for the Project and therefore is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation; however, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

A Mitigated Negative Declaration (IS/MND) has been prepared for the Project that evaluates the Project's potential impacts, taking into consideration the project design features (PDF) and mitigation measures (MM) the Applicant has incorporated into the Project to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor implementation of the PDFs and MMs incorporated into the Project.

5.2. ORGANIZATION

As shown on the following pages, each project design feature and mitigation measure incorporated into the Project is listed and categorized by environmental impact area, with accompanying identification of the following:

- Enforcement Agency: the agency with the power to enforce the PDF or MM.
- Monitoring Agency: the agency to which reports involving feasibility, compliance, implementation, and development are made.
- Monitoring Phase: the phase of the Project during which the PDF or MM shall be monitored.
- Monitoring Frequency : the frequency at which the PDF or MM shall be monitored.

- Action Indicating Compliance: the action by which the Enforcement or Monitoring Agency indicates that compliance with the incorporated PDF or MM has been implemented.

5.3. ADMINISTRATIVE PROCEDURES AND ENFORCEMENT

This MMP shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each incorporated PDF and MM and shall be obligated to provide certification, as identified below, to the appropriate monitoring and enforcement agencies that each PDF and MM has been implemented. The Applicant shall maintain records demonstrating compliance with each PDF and MM. Such records shall be made available to the City of Los Angeles upon request.

During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City of Los Angeles or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of PDFs and MMs during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

The Construction Monitor shall also prepare documentation of the Applicant's compliance with the incorporated PDFs and MMs during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the MMs and PDFs within two businesses days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

5.4. PROGRAM MODIFICATION

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made subject to City of Los Angeles approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The Project shall be in substantial conformance with the PDFs and MMs contained in this MMP. The enforcing departments or agencies may determine substantial conformance with PDFs and MMs in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF or MM may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion

of the PDFs or MMs. Any addendum or subsequent CEQA clearance shall explain why the PDF or MM is no longer needed, not feasible, or the other basis for modifying or deleting the PDF or MM, and that the modification will not result in a new significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a PDF or MM shall not, in and of itself, require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the PDF or MM results in a substantial change to the Project or the non-environmental conditions of approval.

5.5. MITIGATION MONITORING PROGRAM

Hazards and Hazardous Materials

Mitigation Measures

MM HAZ-1: A vapor barrier shall be installed along the base and walls all subterranean garages. The vapor barrier shall be installed to include a sub-slab collection and ventilation system during construction. Based on guidance from the regulatory agency, the vapor barrier shall be operated as an active or passive system.

- **Enforcement Agency:** Department of Building and Safety
- **Monitoring Agency:** Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Construction
- **Action Indicating Compliance:** Field Inspection sign-off

MM HAZ-2: Ongoing annual monitoring and reporting shall occur after construction and during occupancy to evaluate the efficiency of the vapor barriers and to confirm that indoor air is safe for occupants. Monitoring shall include a combination of indoor air sampling, subslab sampling, and/or differential pressure monitoring. Regulatory oversight, monitoring, and reporting shall be required for 10 years.

- **Enforcement Agency:** Department of Building and Safety
- **Monitoring Agency:** Department of Building and Safety
- **Monitoring Phase:** Occupancy
- **Monitoring Frequency:** Ongoing annual
- **Action Indicating Compliance:** Department of Building and Safety sign-off

MM HAZ-3: All elevators running from the parking lots up into the overlying spaces shall be monitored during occupancy to confirm that indoor air is safe for occupants. Monitoring shall include a combination of indoor air sampling, and/or differential pressure monitoring.

- **Enforcement Agency:** Department of Building and Safety
- **Monitoring Agency:** Department of Building and Safety
- **Monitoring Phase:** Occupancy
- **Monitoring Frequency:** Occupancy

- **Action Indicating Compliance:** Department of Building and Safety sign-off

Noise

Project Design Features

PDF NOI-1: Project construction will not include the use of driven (impact) pile systems.

- **Enforcement Agency:** Department of Building and Safety
- **Monitoring Agency:** Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Construction
- **Action Indicating Compliance:** Field Inspection sign-off

PDF NOI-2: Outdoor amplified sound systems, if any, will be designed so as not to exceed the maximum noise level of 80 dBA (L_{eq}) at a distance of 15 feet from the face of the loudspeakers, from all outdoor spaces. A qualified noise consultant will provide written documentation that the design of the system complies with this maximum noise level.

- **Enforcement Agency:** Department of Building and Safety
- **Monitoring Agency:** Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Construction
- **Action Indicating Compliance: Field Inspection sign-off**

Mitigation Measures

MM NOI-1: A temporary and impermeable sound barrier shall be erected at the following locations, prior to the start of earth moving activities. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

- Along the northern property line of the Project Construction Site between the construction area and the residential uses to the north (represented by receptor location R1). The temporary sound barrier shall be designed to provide a minimum 12-dBA noise reduction at the ground level of receptor location R1.
- Along the southern property line of the Project Construction Site between the construction area and the residential use to the east (represented by receptor location R2). The temporary sound barrier shall be designed to provide a minimum 14-dBA noise reduction at the ground level of receptor location R2.
- Along the southern property line of the Project Construction Site between the construction area and the residential uses to the south (represented by receptor location R3). The temporary sound barrier shall be designed to provide a minimum 11-dBA noise reduction at the ground level of receptor location R3.

- Along the western property line of the Project Construction Site between the construction area and the residential uses to the west (represented by receptor location R5). The temporary sound barrier shall be designed to provide a minimum 7-dBA noise reduction at the ground level of receptor location R5.

  - **Enforcement Agency:** Department of Building and Safety
  - **Monitoring Agency:** Department of Building and Safety
  - **Monitoring Phase:** Construction
  - **Monitoring Frequency:** Construction
  - **Action Indicating Compliance:** Field Inspection sign-off

MM NOI-2: The following mitigation measures are provided to reduce the vibration impacts associated with potential human annoyance.

- The use of large construction equipment (i.e., large bulldozer, caisson drill rig, and/or loaded trucks) shall be a minimum of:
  - 35 feet from the Project northern property line
  - 30 feet from the Project southern property line
  - 70 feet from the Project eastern property line (near the building at receptor R2)
- The use of jackhammer shall be a minimum of 35 feet from the Project eastern/southern property line (near the building at receptor R2).

  - **Enforcement Agency:** Department of Building and Safety
  - **Monitoring Agency:** Department of Building and Safety
  - **Monitoring Phase:** Construction
  - **Monitoring Frequency:** Construction
  - **Action Indicating Compliance:** Field Inspection sign-off

Traffic

Project Design Features

PDF TR-1 The following Transportation Demand Management strategies will be incorporated into the Project design:

- BICYCLE INFRASTRUCTURE – Include Bike Parking per LAMC - This strategy involves implementation of short and long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations under existing LAMC regulations applicable to the Project. The Project is required to, and will provide, a minimum of 22 bicycle parking spaces.

- BICYCLE INFRASTRUCTURE – Include Bike Parking and Showers - This strategy involves implementation of additional end of trip bicycle facilities

to support safe and comfortable bicycle travel by providing amenities at the Project. This Project will provide up to four showers and 14 secure lockers.

- **Enforcement Agency:** Department of Building and Safety
- **Monitoring Agency:** Department of Building and Safety
- **Monitoring Phase:** During Project Design and Prior to Construction
- **Monitoring Frequency:** Review of Plans
- **Action Indicating Compliance:** Department of Building and Safety sign-off

PDF TR-2 The Applicant will, prior to construction, develop a Construction Traffic Control/Management Plan (CTM Plan) to be approved by LADOT to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project. The CTM Plan will identify the location of any roadway closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. The CTM Plan will also address the potential conflicts associated with concurrent construction activities of related projects, if applicable.

- **Enforcement Agency:** Department of Building and Safety
- **Monitoring Agency:** Department of Building and Safety
- **Monitoring Phase:** During Project Design and Prior to Construction
- **Monitoring Frequency:** Review of Plans
- **Action Indicating Compliance:** LADOT sign-off

PDF TR-2 The Applicant will, prior to construction, develop a Construction Traffic Control/Management Plan (CTM Plan) to be approved by LADOT to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project. The CTM Plan will identify the location of any roadway closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. The CTM Plan will also address the potential conflicts associated with concurrent construction activities of related projects, if applicable.

- **Enforcement Agency:** Department of Building and Safety
- **Monitoring Agency:** Department of Building and Safety
- **Monitoring Phase:** During Project Design and Prior to Construction
- **Monitoring Frequency:** Review of Plans
- **Action Indicating Compliance:** LADOT sign-off

Tribal Cultural Resources

Mitigation Measure

MM TRC-1: In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall assess the find. Work on the portions of the Project outside of the buffered area may continue during this assessment period. The Gabrieleno Band of Mission Indians-Kizh Nation shall be contacted regarding any pre-contact and/or post-contact finds and be provided information after the archaeologist makes their initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant in accordance with applicable law, the Project applicant shall retain a professional Native American monitor procured by the Gabrieleno Band of Mission Indians-Kizh Nation to observe all remaining ground-disturbing activities including, but not limited to, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, clearing, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work. The Lead Agency and/or applicant shall, in good faith, consult with the Gabrieleno Band of Mission Indians-Kizh Nation on the disposition and treatment of any Tribal Cultural Resource encountered during all ground disturbing activities pursuant to the process set forth below.

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed Project, and (2) Department of City Planning, Office of Historic Resources (OHR).

2. If OHR determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

3. The Applicant, or its successor, shall implement the tribe's recommendations if a qualified archaeologist retained by the City and paid for by the Applicant, or its successor, in consultation with the tribal monitor, reasonably conclude that the tribe's recommendations are reasonable and feasible.

4. In addition to any recommendations from the applicable tribe(s), a qualified archeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.

5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or qualified tribal monitor, the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the archaeologist or tribal monitor; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate an significant impacts to tribal cultural resources. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.

6. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.

7. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in Items 2 through 5 above.

8. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the SCCIC at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.

9. Notwithstanding Item 8 above, any information that the Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.

    - **Enforcement Agency:** Department of Building and Safety
    - **Monitoring Agency:** Department of Building and Safety
    - **Monitoring Phase:** Prior to Construction and Construction

- **Monitoring Frequency:** As Needed Prior to Construction and Construction
- **Action Indicating Compliance:** Submittal of compliance report by Monitor

INITIAL STUDY

6.0 PREPARERS AND PERSONS CONSULTED

LEAD AGENCY

City of Los Angeles
Department of City Planning
Alex Truong, City Planning Associate

PROJECT APPLICANT

BARDAS Investment Group, LLC
1015 N. Fairfax Avenue
West Hollywood, Ca 90046

PROJECT ARCHITECT

House & Robertson Architects
10125 Washington Boulevard
Culver City, CA 90232

ENVIRONMENTAL CONSULTANT

EcoTierra Consulting, Inc.
633 W. 5th Street, 26th Floor
Los Angeles, CA 90071
Craig Fajnor, Principal
Jenny Mailhot, Project Manager
Jennifer Johnson, Project Manager
Marisa Wyse, Senior Environmental Planner

AIR QUALITY, GREENHOUSE GAS, ENERGY

MD Acoustics, LLC
1197 Los Angeles Ave, Ste C-256
Simi Valley, CA 93065
Mike Dickerson, Principal
Tyler Klassen, EIT

GEOTECHNICAL ENGINEERING INVESTIGATION

Geotechnologies, Inc.
439 Western Avenue
Glendale, CA 91201

Scott Prince, Register Professional Engineer
Reinard Knur, Register Professional Engineer

ENERGY

KPFF Consulting Engineers
700 South Flower Street, Suite 2100
Los Angeles, CA 90017
Kyle Trudeau, Civil Engineer

HISTORIC REPORT

Historic Resources Group
12 South Fair Oaks Avenue, Suite 200
Pasadena, CA 91105
Paul Travis, AICP, Principal
Heather Goers, Senior Architectural Historian

PHASE I ESA

Partner Engineering and Science, Inc.
2154 Torrance Boulevard, Suite 200
Torrance, CA 90501
Cody Taylor, National Client Manager

TRAFFIC ASSESMENT

Overland Traffic Consultants, Inc.
952 Manhattan Beach, Boulevard, #100
Manhattan Beach, CA 90266
Liz Fleming, Traffic Engineer

TREE REPORT

Paul Lewis Landscape Architect
133351-D Riverside Drive # 445
Sherman Oaks, CA 91423
Paul Lewis

UTILITY INFRASTRUCTURE REPORTS

KPFF Consulting Engineers
700 South Flower Street, Suite 2100
Los Angeles, CA 90017
Christophe Bornand, PE.
Kyle Trudeau, Civil Engineer

VAPOR ASSESSMENT

RMD Environmental Solutions
1371 Oakland Boulevard, Suite 200
Walnut Creek, CA 94596
Kristen Duey, Principal Engineer
Paola Gomez Birenbaum, P.G., Senior Geologist

INITIAL STUDY

7.0 ABBREVIATIONS & ACRONYMS

AB	Assembly Bill
ADT	Average daily trip rate
ANSI	American National Standard Institute
APC	Area Planning Commission
AQMP	Air Quality Management Plan
Basin	South Coast Air Basin
BACM	Best Available Control Measures
BMPs	Best Management Practices
BOE	Bureau of Engineering
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CalGreen	California Green Building Standards
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
Caltrans	California Department of Transportation
CCR	California Code of Regulations
C&D	Construction and Demolition
CEQA	California Environmental Quality Act
CF	Cubic Feet
CH_4	Methane
CHRIS	California Historical Resources Information System
City	City of Los Angeles, California
CMA	Critical Movement Analysis
CMP	Congestion Management Program

CNEL	Community Noise Exposure
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalents
CTM	Construction Traffic Control/Management Plan
CY	Cubic Yards
CWC	California Water Code
dBA	Decibel
EF	Emission Factor
EIA	U.S. Energy Information Administration
EMFAC	Emission Factor
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
ESCP	Erosion and Sediment Control Plan
FAA	Federal Aviation Administration
FAR	Floor-to-area ratio
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GHG	Greenhouse gas(es)
GPM	Gallons Per Minute
GSA	Groundwater Sustainability Agencies
GSP	Groundwater Sustainability Plan
GWH	Gigawatt
GWP	Global Warming Potential
HFCs	Hyrdofluorcarbons
H_20	Water Vapor
HQTA	High Quality Transit Areas
HTP	Hyperion Treatment Plant
HVAC	Heating, Ventilation and Air Conditioning

ITE	Institute of Transportation Engineers
kWh	Kilowatt Hours
LAAFP	Los Angeles Aqueduct Filtration Plant
LACC	Los Angeles County Code
LACDPW	Los Angeles County Department of Public Works
LADBS	City of Los Angeles Department of Building and Safety
LADWP	City of Los Angeles Department of Water and Power
LADOT	City of Los Angeles Department of Transportation
LAFD	City of Los Angeles Fire Department
LAGBC	Los Angeles Green Building Code
LAMC	Los Angeles Municipal Code
LAPD	City of Los Angeles Police Department
LAPL	City of Los Angeles Public Library
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LCFS	Low Carbon Fuel Standard
LEQ	Average Sound Level
LOS	Level of Service
LID	Low Impact Development
HWRP	Hyperion Water Reclamation Plant
MBTA	Migratory Bird Treaty Act
Metro	Los Angeles County Metropolitan Transportation Authority
MMP	Mitigation Monitoring Program
MOU	Memorandum of Understanding
MPOs	California Metropolitan Planning Organizations
MS4	Municipal Separate Storm Sewer System
MTA	Metropolitan Transportation Authority
$MTCO_2e$	Metric Tons Carbon Dioxide Equivalents
MRZ	Mineral Resource Zone
MW	Megawatts

MWD	Metropolitan Water District of Southern California
MWELO	Model Water Efficient Landscape Ordinance
NAAQS	National Ambient Air Quality Standard
NFPA	National Fire Protection Association
NHSTA	National Highway Traffic Safety Administration
NPDES	National Pollution Discharge Elimination System
N_2O	Nitrous Oxide
NO_x	Nitrogen Oxides
OES	Obstruction Evaluation Service
OFFROAD	Off Road
OHP	California Office of Historic Preservation
OS	Open Space
PCBs	Polychlorinated Biphenyls
pCi/L	picoCuries per Liter
PDF	Project Design Feature
PFCs	Perfluorocarbons
$PM_{2.5}$	Fine Particulate Matter
PM_{10}	Particulate Matter
PPV	Peak Particle Velocity
PRC	Public Resource Code
PSI	Pounds Per Square Inch
RCPG	Regional Comprehensive Plan and Guides
REC	Recognized Environmental Conditions
RMS	Root Mean Square
ROG	Reactive Organic Gas
RPS	Renewables Portfolio Standard
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SB	Senate Bill

SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	The South Central Coastal Information Center
SF_6	Sulfur Hexafluoride
SGMA	Sustainable Groundwater Management Act
SHRC	State Historic Resources Commission
SoCalGas	Southern California Gas Company
SO_x	Sulfur Oxides
SWPPP	Stormwater Pollution Prevention Program
SWRCB	State Water Resources Control Board
SWQDv	Stormwater Quality Design Volume
TAC	Toxic Air Contaminants
TAG	Traffic Assessment Guidelines
TCR	Tribal Cultural Resources
TMDL	Total Maximum Daily Load
TL	Transmission Loss
USEPA	U.S. Environmental Protection Agency
UWMP	Urban Water Management Plan
V/C	Volume to Capacity Ratio
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
ZEV	Zero Emission Vehicle
ZI	Zoning Information
ZIMAS	City of Los Angeles Zoning Information and Map Access System