LOS ANGELES
DEPARTMENT OF CITY
PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

INITIAL STUDY

East End Studios ADLA

Case Number: ENV-2022-5830-EIR

Project Location: 1206–1338 East 6th Street, 1210–1361 East Produce Street, 635 and 639 Mill Street, 1205–1321 Wholesale Street, 640 South Alameda Street, Los Angeles, California 90021

Community Plan Area: Central City North Community Plan Area

Council District: 14—Kevin de León

Project Description: East End Studios Arts District Los Angeles (East End Studios ADLA, the Project) includes the development of a new production studio campus on an approximately 14.6-acre (635,551 square feet) site located at the southeast corner of 6th Street and Alameda Street (Project Site) within the Central City North Community Plan area of the City of Los Angeles (City). The Project would include eight new soundstages with each soundstage containing two studios for a total of 16 studios, eight structures that would be programmed with studio production support uses, four new office buildings, and a publicly accessible parklet (located at the corner of 6th Street and Mill Street). The Project could also provide an area within the footprint of the enclosed mechanical platform along 6th Street, adjacent to the proposed parklet and near 6th Street and Mill Street, that could be used by a potential retailer such as a café. The area for this space would be approximately 1,560 square feet. If this area is not used by a retailer, the area would be used to accommodate additional bicycle parking. The Project would comprise a total floor area of 674,175 square feet, including a potential café, with a floor area ratio (FAR) of 1.06:1. A total of 1,317 vehicular parking spaces is anticipated to be provided for the proposed uses within one level of below grade parking, surface parking, and within a five-story parking structure. The existing two warehouse structures consisting of approximately 311,000 square feet would be demolished as part of the Project.

PREPARED FOR:
The City of Los Angeles
Department of City Planning

PREPARED BY:
Eyestone Environmental, LLC

APPLICANT:
Alameda Studio Owner, LLC

February 2023

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1 INTRODUCTION

An application for the proposed East End Studios ADLA Project (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, implementation, and operation of the proposed Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code Section 21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, Section 15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City 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 has concluded that the Project may result in significant impacts on the environment and the preparation of an Environmental Impact Report (EIR) is required. This Initial Study and the forthcoming EIR are intended as informational documents, which are ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE OF AN INITIAL STUDY

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

1.2 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

Below is a general overview of the CEQA process. The CEQA process is guided by the CEQA statutes and guidelines, which can be found on the State of California's website (http://files.resources.ca.gov/ceqa).

1.3.1 Initial Study

At the onset of the environmental review process, the City has 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 may have a significant effect(s) on the environment and an EIR will be prepared.

A Notice of Preparation (NOP) is prepared to notify public agencies and the general public that the Lead Agency is starting the preparation of an EIR for the proposed project. The NOP and Initial Study are circulated for a 30-day review and comment period. During this review period, the Lead Agency requests comments from agencies and the public on the scope and content of the environmental information to be included in the EIR. After the close of the 30-day review and comment period, the Lead Agency continues the preparation of the Draft EIR and any associated technical studies, which may be expanded in consideration of the comments received on the NOP.

1.3.2 Draft EIR

Once the Draft EIR is complete, a Notice of Completion and Availability is prepared to inform public agencies and the general public of the availability of the document and the locations where the document can be reviewed. The Draft EIR and Notice of Availability are circulated for a 45-day review and comment period. The purpose of this review and comment period is to provide public agencies and the general public an opportunity to review the Draft EIR and comment on the document, including the analysis of environmental effects, the mitigation measures presented to reduce potentially significant impacts, and the alternatives analysis. After the close of the 45-day review and comment period, responses to comments on environmental issues received during the comment period are prepared.

1.3.3 Final EIR

The Lead Agency prepares a Final EIR, which incorporates the Draft EIR or a revision to the Draft EIR, comments received on the Draft EIR and list of commenters, and responses to significant environmental points raised in the review and consultation process.

The decision-making body then considers the Final EIR, together with any comments received during the public review process, and may certify the Final EIR and approve the project. In addition, when approving a project for which an EIR has been prepared, the Lead Agency must prepare findings for each significant effect identified, a statement of overriding considerations if there are significant impacts that cannot be mitigated, and a mitigation monitoring program.

2 EXECUTIVE SUMMARY

PROJECT TITLE	**EAST END STUDIOS ADLA**
ENVIRONMENTAL CASE NO.	ENV-2022-5830-EIR
RELATED CASES	CPC-2022-5829-VCU-SPR and VTT-83917

PROJECT LOCATION	Los Angeles
COMMUNITY PLAN AREA	Central City North Community Plan
GENERAL PLAN DESIGNATION	Heavy Manufacturing
ZONING	M3-1-RIO
COUNCIL DISTRICT	CD 14 – KEVIN DE LEON

LEAD AGENCY	**City of Los Angeles**
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	**Kathleen King**
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APPLICANT	**ALAMEDA STUDIO OWNER, LLC**
ADDRESS	1239 S. Glendale Avenue, Glendale, CA 91205
PHONE NUMBER	(213) 279-6965

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.

Kathleen King, City Planner	February 9, 2023
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.

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

East End Studios Arts District Los Angeles (East End Studios ADLA, the Project) includes the development of a new production studio campus on an approximately 14.6-acre (635,551 square feet) site located at the southeast corner of 6th Street and Alameda Street (Project Site) within the Central City North Community Plan area of the City of Los Angeles (City). The Project would include eight new soundstages with each soundstage containing two studios for a total of 16 studios, eight structures that would be programmed with studio production support uses, four new office buildings, and a publicly accessible parklet (located at the corner of 6th Street and Mill Street). The Project could also provide an area within the footprint of the enclosed mechanical platform along 6th Street, adjacent to the proposed parklet and near 6th Street and Mill Street, that could be used by a potential retailer such as a café. The area for this space would be approximately 1,560 square feet. If this area is not used by a retailer, the area would be used to accommodate additional bicycle parking. The Project would comprise a total floor area of 674,175 square feet, including a potential café, with a floor area ratio (FAR) of 1.06:1. A total of 1,317 vehicular parking spaces is anticipated to be provided for the proposed uses within one level of below grade parking, surface parking, and within a five-story parking structure. The existing two warehouse structures consisting of approximately 311,000 square feet would be demolished as part of the Project.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located at 1206–1338 East 6th Street, 1205–1321 Wholesale Street, 1210–1361 Produce Street, 635 and 639 Mill Street, and 640 South Alameda Street within the Central City North Community Plan of the City of Los Angeles. As shown in Figure 1 on page 8, the Project Site is bounded by 6th Street to the north, Mill Street to the east, commercial and industrial zoned land currently developed with warehouse uses to the south, and Alameda Street to the west. There is a 30-foot strip of land adjacent to the south of the Project Site labeled as Wholesale Street on the City's Zone Information and Map Access System (ZIMAS) map. However, this is not a public right-of-way, and the land is privately-owned and zoned for commercial uses.

Local access to the Project Site is provided by 6th Street located north of the Project Site and Alameda Street located west of the Project Site. Regional access to the Project Site is provided by the Hollywood Freeway (US-101), the Santa Monica Freeway (I-10), and the Golden State Freeway (I-5), which are within approximately one mile of the Project Site. The Project Site is served by a variety of public transit options, including a number of local and regional bus lines serviced by the Los Angeles County Metropolitan Transit Authority (Metro) and the Los Angeles Department of Transportation (LADOT) that provide connections to Downtown subway stations. In particular, the Project Site is located within 0.5 mile of Metro Line 53 and 50 at the intersection of 7th Street and Central Avenue, and Metro Line 53 and 720 at the intersection of East 6th Street and Central Avenue.

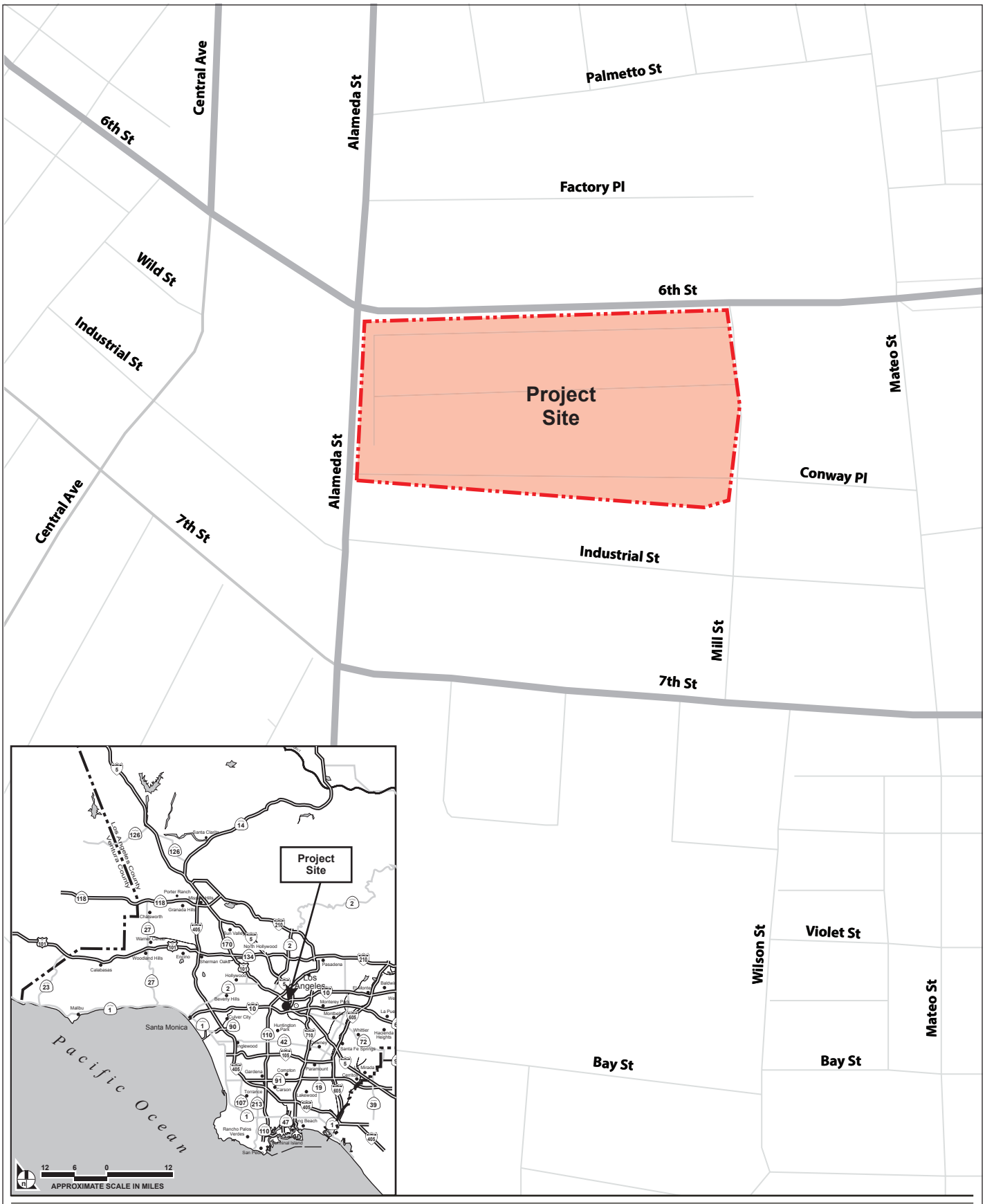

Figure 1
Project Location Map

Source: ArcGIS, 2022; Eyestone Environmental, 2022.

3.2.2 Existing Conditions

As shown in the aerial photograph provided in Figure 2 on page 10, the Project Site is currently developed with two large single-story warehouse structures consisting of approximately 311,000 square feet of floor area. The existing buildings are currently use for storage and distribution purposes. The Project Site also includes surface parking areas for automobiles and tractor trailer trucks.

The Project Site is relatively flat with limited ornamental landscaping. A total of six trees were identified surrounding the Project Site, all of which are located along Alameda Street in the public right-of-way. No on-site trees were observed. The street trees identified consist of various non-native species, including four yew pine trees, one pink trumpet tree, and one desert willow tree. Based on the Tree Inventory Report included in Appendix IS-1 of this Initial Study, none of the street trees are considered to be protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.[2,3]

The Project Site is located within the Central City North Community Plan area. The Project Site is designated as Heavy Manufacturing and is zoned as M3-1-RIO (Heavy Industrial, Height District 1, River Improvement Overlay District). The M3 zone is an expressly corresponding zone to the Project Site's Heavy Manufacturing land use designation. The Project Site's zoning is therefore consistent with the Project Site's Community Plan land use designation. The M3 zone allows for motion picture, television, video, and other media production (and supporting office) uses by right. The "1" in the Project Site's zoning designation refers to the Project Site's location in Height District 1. All uses located in the M3 zone and within Height District 1 are restricted to a maximum floor area ratio (FAR) of 1.5 times the property's buildable area.[4] The 1 Height District does not impose a vertical height limitation on the Project Site. The M3 zone does not impose any setback requirements for commercial or industrial uses. Accordingly, buildable area for FAR purposes is the same as lot area. With a maximum FAR of 1.5 to 1, the Project Site's 635,551 square feet of lot area/buildable area would permit up to 953,327 square feet of floor area.

The RIO in the property's zoning designation refers to the Project Site's location in the Los Angeles River Improvement Overlay Zone. The RIO does not impose any use, FAR, height, or setback restrictions or standards. Pursuant to LAMC Section 13.17, projects in the Los Angeles River's outer core, including the Project, are required to comply with various screening standards and requires that new landscaping utilize native species. The Project will comply with all landscaping, screening and fencing requirements in Section 13.17.

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2 Carlberg Associates, 6th and Alameda, Los Angeles, California 9021 – City of Los Angeles Tree Inventory Report, August 4, 2022. See Appendix IS-1 of this Initial Study.

3 Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.

4 FAR and height restrictions can be found at LAMC Section 12.21.1.A.1.

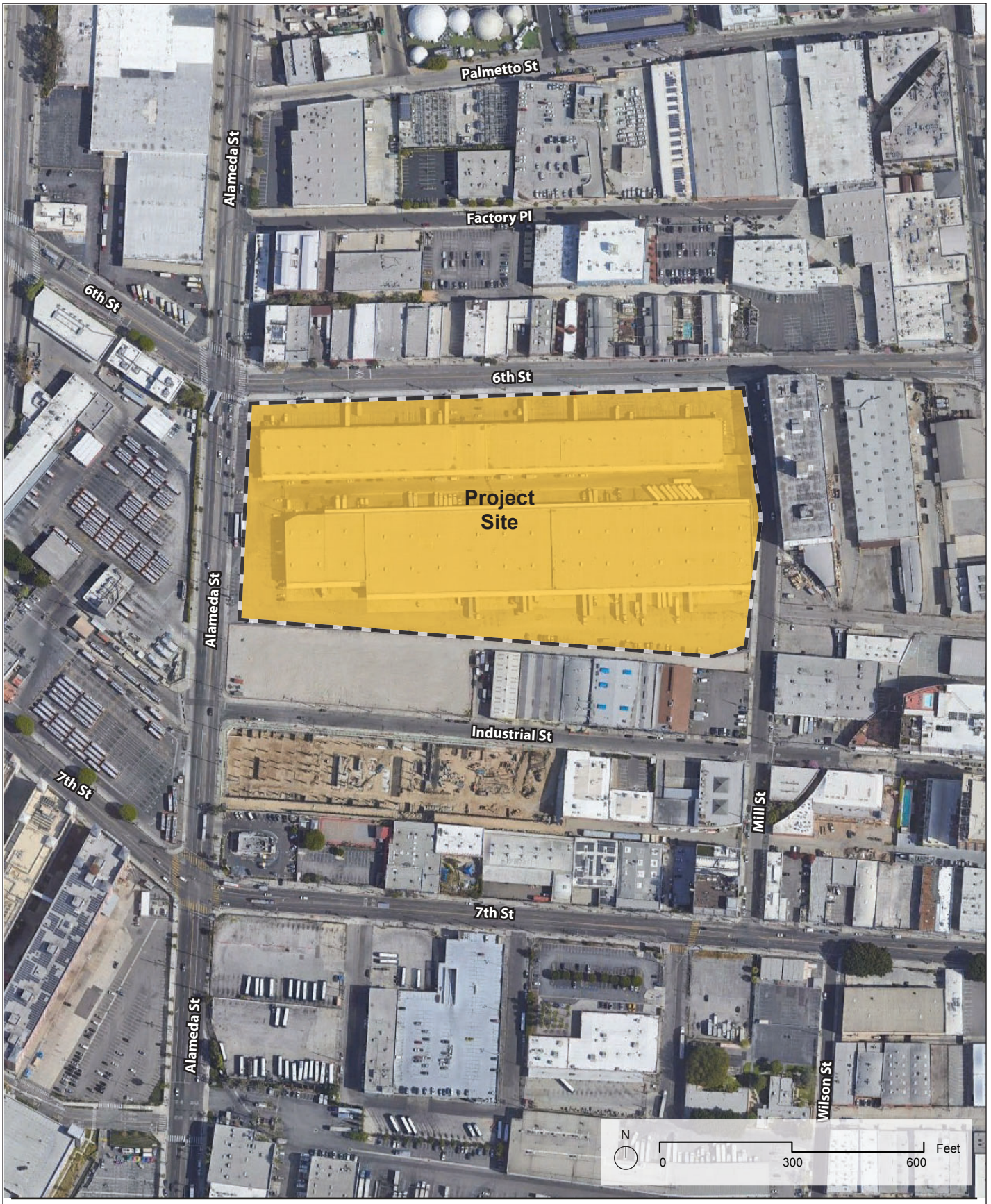

Figure 2

Aerial View of Project Site and Vicinity Map

Source: Google Maps, 2022; Eyestone Environmental, 2022.

The Project Site is also identified as being in a Transit Priority Area as defined by Senate Bill (SB) 743 and the City Zoning Information Ordinance No. 2452.[5] As described above, the Project Site is well served by a variety of existing and planned public transit options along Alameda Street provided by the Metro and LADOT. The Project Site is also located within the Metro ROW Project Area as defined by the City Zoning Information Ordinance No. 1117. Consultation with Metro is required prior to the issuance of any building permit for projects within 100 feet of Metro-owned Rail of Bus Rapid Transit (BRT) right-of-way (ROW).[6] The Project would undergo the required Metro review and clearance process.

3.2.3 Surrounding Land Uses

The area surrounding the Project Site is highly urbanized and includes a mix of low to mid rise buildings containing a variety of industrial, commercial, and residential uses. The surrounding properties are generally zoned M3, which is consistent with the zoning of the Project Site. To the north of the Project Site, across 6th Street, is property zoned as M3-1-RIO including a mixture of 1, 2 and 3 story buildings with a variety of uses. To the east of the Project Site, across Mill Street, is additional property zoned as M3-1-RIO including a 6-story building with mostly industrial use. To the west of the Project Site, across Almeda Street, is land zoned as PF (public facilities) and is comprised of an LA Metro bus storage facility. Additionally, there are various 7-story structures and a 10-story parking garage located across 7th Street from the LA Metro bus storage facility, which are part of the Row DTLA development. To the south of the Project Site is land zoned as C2-2D-RIO and M3-1-RIO. To the immediate south of Industrial Street, a mixed-use project comprised of live/work units and commercial, retail, restaurant and art production space is currently under construction; however, a majority of the other southern parcels are either vacant or include one- and two-story buildings.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Project would include eight new soundstages with each soundstage containing two studios for a total of 16 studios, eight production support buildings adjacent to each soundstage, four new office buildings, and a publicly accessible parklet. The Project could also provide an area within the footprint of the enclosed mechanical platform along 6th Street, adjacent to the proposed parklet and near 6th Street and Mill Street, that could be used by a potential retailer such as a café. The area for this space would be approximately 1,560 square feet. If this area is not used by a retailer, the area would be used to accommodate additional bicycle parking.

As detailed in Table 1 on page 12, the Project would comprise a total floor area of 674,175 square feet, including a potential café, with a floor area ratio (FAR) of 1.06:1. A total of 1,317 vehicular parking spaces

[5] SB 743 established new rules for evaluating aesthetic and parking impacts under CEQA for certain types of projects. Specifically, Public Resources Code Section 21099(d) states: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center on an infill site within a TPA shall not be considered significant impacts on the environment." TPAs are areas within 0.5 mile of a major transit stop that are existing or planned. Thus, in accordance with SB 743 and the City's ZI No. 2452, the Project's aesthetic and parking impacts are not considered significant as a matter of law.

[6] City of Los Angeles Zoning Information and Map Access System, Inter-Departmental Correspondence, September 1, 2021.

Table 1
Summary of Existing and Proposed Floor Area[a]

Land Use	Floor Area
Existing (All to Be Removed)	
Warehouse/Self-Storage	311,000 sf
Total Existing Floor Area to Be Removed	*311,000 sf*
New Construction	
Soundstages	308,829 sf
Production Support (including Mill Space)	102,460 sf
General Office	261,326 sf
Café	1,560 sf
Total New Construction	674,175 sf
Total Floor Area Upon Completion	674,175 sf

sf = square feet

[a] *Square footage is calculated pursuant to the Los Angeles Municipal Code (LAMC) definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as "[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas."*

Source: Eyestone Environmental, 2022.

is anticipated to be provided for the proposed uses within one level of below grade parking, surface parking, and within a five-story parking structure. The existing two warehouse structures consisting of approximately 311,000 square feet would be demolished as part of the Project.

3.3.2 Design and Architecture

As illustrated in Figure 3 on page 13, the eight soundstages would be organized around the Project Site such that four soundstages align with 6th Street and four soundstages align with Wholesale Street (which is privately owned and zoned commercial). Each of the support buildings would be adjacent to each of the eight soundstages. The four office buildings would be distributed throughout the Project Site in between the soundstages. As depicted in Figure 3, one of the office buildings would front onto 6th Street, another would front Mill Street, and another would front Alameda Street. The remaining office building would be located along the southern boundary of the Project Site (along Wholesale Street). The proposed publicly accessible parklet would be located near the corner of 6th Street and Mill Street. If realized, the café would be located adjacent to the parklet, also near the corner of 6th Street and Mill Street and would be integrated into the proposed building space and would not be a separate structure. Specifically, as previously described, the café could be located within the footprint of the enclosed mechanical platform along 6th Street, adjacent to the proposed parklet near 6th Street and Mill Street. The parking structure would be located along Wholesale Street between two soundstages. As shown in

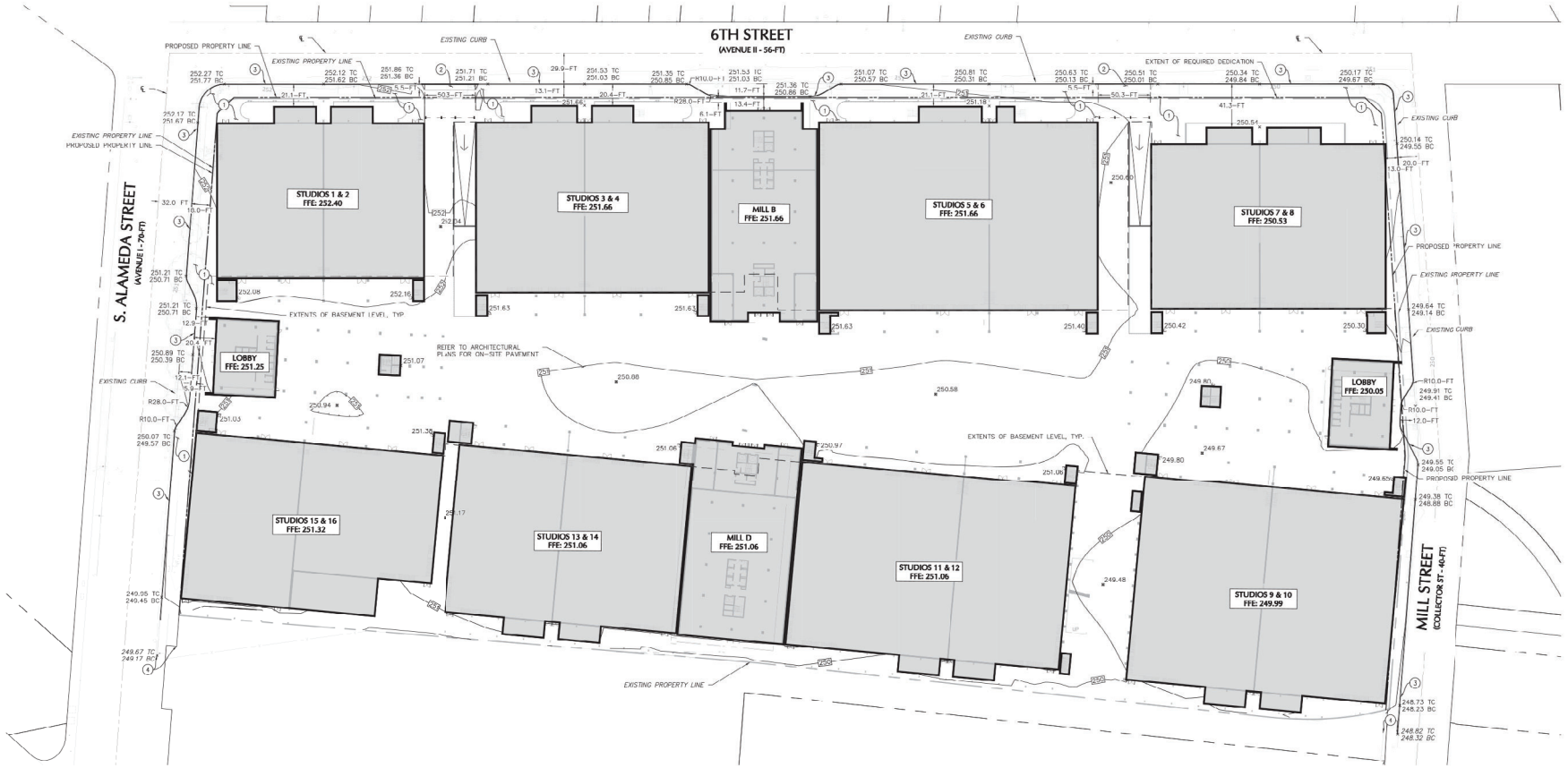

Figure 3
Conceptual Site Plan

Source: Grimshaw Architects, LLP, 2022.

Figure 3 on page 13, the Project would include a total of 21 separate structures, including eight soundstages, eight support buildings, four office buildings, and one parking structure.

The eight soundstages, which comprise a total of 308,829 square feet, would each be one story and have a maximum height of between 49-55 feet to the top of the parapet. The proposed production support buildings, which would each be adjacent to each of the eight soundstages would comprise a total of 74,640 square feet.

Each of the production support buildings would be three stories and include amenities on Level 2 that include hair and make-up, dressing rooms, waiting rooms, restrooms, showers, and/or similar uses. The second level of each of the production support buildings would contain support office, restrooms, control rooms, and services. Each of the proposed production support buildings would not exceed a height of 45 feet.

The proposed office structures, which comprise a total of 261,326 square feet, would each be 5 stories and up to 75 feet in height to the last occupiable floor (and up to a height of 89 feet including mechanical equipment). The office buildings would include a lobby on the ground floor with pedestrian access and an amenity level on the second floor. Two office buildings (Buildings 6 and 17) would include a total of 27,820 square feet of mill space[7] on the ground floor with some additional production support uses (hair and makeup). Levels 3 to 5 would include a balance of traditional office uses, restrooms, breakout rooms and kitchen. Additionally, each office building would include open roof decks. Solar panels would be provided within a rooftop structure; the area beneath this rooftop structure is not occupiable.

Figure 4 on page 15 provides conceptual renderings of the Project as viewed from the surrounding streets. As shown, the proposed design of the Project provides variable massing, materiality, and texture on the public facing street façades. Layered in front of the sound stage walls, metal cladding would shield mechanical equipment and provide shelter to bicycle parking. At the mid-block on each side of the Project Site, high-quality, transparent and engaging storefront glazing would clad the lobby of each creative office building at the street level while glass and metal panels would clad the upper levels. At the corner of Mill Street and 6th Street, a public parklet would provide additional landscaping along the public ROW on all public sides of the Project. This public parklet would be located near the corner of Mill Street and 6th Street. On Alameda Street and Mill Street, planters would be sized appropriately to accommodate trees and screening plants directly adjacent to studio walls. Additional design materials such as murals and landscaping would be used to further enliven the appearance of these public facing façades. These shorter façades also provide the mid-block activation of the office lobbies and floors above.

Internally, the Project would utilize high-quality materials, structures and landscaped common areas to create valuable office and production space, with all production-related noise contained within the Project's internal courtyard and "base camp" areas.

[7] Mill space is designated floor area that provides additional space for studio production operations.

View from 6th Street looking west

Aerial view from northeast coener (6th and Mill)

Figure 4
Conceptual Renderings

Source: Grimshaw Architects, LLP, 2022.

3.3.3 Open Space and Landscaping

As a commercial development, the Project is not required to provide open space in accordance with the LAMC. Notwithstanding, the Project's landscaping and open space plan has been designed to enhance the public realm, create more effective transitions between off-site and on-site uses, and provide useable open space on-site. As shown in Figure 5 on page 17, landscaping and open space elements would be used to unify the various buildings and activities on the Project Site through a cohesive plant palette to be used along the streetscape, within the amenity deck, and within the roof decks of the proposed office buildings. Plantings would include resilient, drought-tolerant native and adaptive tree, shrub, and groundcover species, including shade trees.

The Project would also enhance the public realm through streetscape improvements that would create a cohesive visual identity for the Project Site and enhance the pedestrian experience, while providing for the unique security needs of a production studio. As shown in Figure 5, the Project would include new landscaping along Alameda Street, 6th Street, and Mill Street. These perimeter areas would include landscaping such as street trees and shrubs, lighting, wayfinding signage. At the corner of Mill Street and 6th Street, a public parklet would be provided. In addition, the Project would include a landscaped amenity deck at the second level of the office building, which would connect the buildings and provide pedestrian circulation as well as ample open space for use by employees. Landscaped roof decks within each of the four office buildings would also be provided.

As part of the Project, the six existing trees along Alameda Street would be removed. These existing trees would be replaced at a 2:1 ratio in accordance with City requirements. In addition, the Project would include the planting of additional trees along the perimeter of the Project Site to enhance the streetscape.

3.3.4 Access, Circulation, and Parking

Vehicular access to the Project Site would be provided from two large, gated driveways along 6th Street, and an additional non-truck vehicle driveway used for VIP access on Mill Street. The West Gate would be located between Soundstage Buildings 2 and 4, more than 200 feet from the 6th Street/Alameda Street intersection, and would provide a ramp down to the Project's subterranean parking level. The East Gate would be located between Soundstage Buildings 7 and 9, more than 200 feet from the 6th Street/Mill Street intersection, and would provide a ramp up from the Project's subterranean parking level. An LADWP-only access driveway would also be located along Alameda Street. Due to the unique security requirements of production studio campuses, pedestrian access to the campus would not be available to the public. However, each of the office buildings fronting the surrounding streets along 6th Street, Alameda Street, and Mill Street would include large lobbies at the ground level to enhance pedestrian activity along those street frontages while maintaining essential security.

As previously described, parking within the Project Site would be provided in (a) one level of subterranean parking, which would only extend through the basecamp area and would not extend through the entirety of the Project Site; (b) a five-level parking garage located along Wholesale Street; and (c) in surface parking areas which are located across the Project Site. Overall, the Project is anticipated to provide a total of 1,317 vehicular parking spaces. Additionally, the Project would provide 258 bicycle parking stalls.

Figure 5
Conceptual Open Space and Landscape Plan

Source: Grimshaw Architects, LLP, 2022.

3.3.5 Lighting and Signage

All lighting would comply with current energy standards and codes while providing appropriate light levels to accent signage, architectural features, and landscaping elements. Light sources would be shielded and/or directed toward Project Site areas to minimize light spill-over to neighboring properties and the surrounding area while utilizing low-level exterior lights at the site perimeter, as needed, for aesthetic, security, and wayfinding purposes. Additionally, new street and pedestrian lighting within the public right-of-way would provide appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties, in compliance with applicable City regulations and with approval by the Bureau of Street Lighting. Glass in building façades would be selected for qualities such as low reflectivity to reduce glare; energy efficiency to limit solar heat gain; high visibility for adequate light transmission; and acoustic performance to reduce noise from outside.

New signage would be integrated with and complement the overall aesthetic character of proposed on-site development and surroundings. Project signage could include general ground-level and wayfinding pedestrian signage around the Project Site perimeter, building identification signs, marquee and monument signs, pillar and pole signs, banners, and other sign types such as on-site wall signs, internal digital on-site signage, murals, and studio graphics that are typical on production studios. Project signage may include both externally and internally lit signs, and LAMC illumination regulations would apply.

3.3.6 Site Security

Project security would be achieved via a combination of physical and operational strategies aimed at providing a secure and safe working studio environment. Fencing, walls, landscaping, and other elements would be used to create a physical barrier at the perimeter of the Project Site to maintain the necessary privacy for certain production activities and ensure pedestrian safety. In addition, points of entry would be secured by elements such as guard booths, key card passes, pedestrian and vehicular access controls, and site-wide lighting. Operational elements such as 24-hour security, employee and visitor badging, and visual surveillance would further enhance the security and safety of the studio. Office lobbies would also include security-controlled access.

3.3.7 Sustainability Features

The Project would support environmental sustainability by incorporating sustainable building features and construction protocols required by the Los Angeles Green Building Code (LAMC Chapter IX, Article 9), the California Green Building Standards Code (California Code of Regulations, Title 24, Part 11; referred to as the CALGreen Code), and the California Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6; California Energy Code). Both in compliance with and, in some cases, in exceedance of Code requirements, a number of specific sustainable design components would be incorporated into the Project, potentially including, but not limited to: Energy Star appliances; solar panels; plumbing fixtures and fittings that comply with the performance requirements specified in the Los Angeles Green Building Code; weather-based irrigation systems; water-efficient plantings with drought-tolerant species; shade trees in public areas; green walls in some outdoor areas; vegetated roofs or cool roof systems to help reduce energy use; short- and long-term bicycle parking; use of daylighting where feasible; and energy-efficient lighting. Such measures would address energy conservation, water conservation, and waste reduction and will be further defined in the EIR.

3.3.8 Anticipated Construction Schedule

Project construction would begin with the demolition of the existing warehouse structures. The next phase would include grading and excavation for the subterranean parking level, which would extend to a depth of approximately 11 feet below ground surface. The foundation would then be laid, followed by building construction, and then finally paving and landscaping installation. Project construction is anticipated to commence in 2024 and be completed in 2026. It is estimated that approximately 198,000 cubic yards of export would be hauled off the Project Site.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The Environmental Impact Report will analyze impacts associated with the Project and will provide 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:

- Pursuant to Section 12.24 U.14 of the LAMC, a Vesting Conditional Use Permit for a Major Development Project.
- Pursuant to Section 16.05 C of the LAMC, Site Plan Review for a project resulting in more than 50,000 square feet net increase in non-residential floor area.
- Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map.
- Other discretionary and ministerial permits that may be deemed necessary, including, but not limited to, temporary street closure 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). No responsible agency has been identified for the Project.

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) Section 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 City's 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA."[8]

PRC Section 21099 applies to the Project. Specifically, pursuant to PRC Section 21099, the Project is an employment center project located on an infill site within a TPA. The Project Site is located on an infill site, as that term is defined in PRC Section 21099(a)(4), because the Project Site is located in a highly urbanized area of the City of Los Angeles (City) and includes lots located within this urban area that has been previously developed. In addition, the Project Site is also located within a TPA because it is located within 0.5 mile of an existing "major transit stop". In particular, the Project Site is located within 0.5 mile of Metro Line 53 and 50 at the intersection of 7th Street and Central Avenue, and Metro Line 53 and 720 at the intersection of East 6th Street and Central Avenue. The City's Zone Information and Map Access System (ZIMAS) also confirms the Project Site's location within a TPA, as defined in ZI No. 2452. Therefore, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment and do not require evaluation under CEQA. The analysis regarding aesthetics in this Initial Study is for informational purposes only and not for determining

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

whether the Project will result in significant aesthetic impacts on the environment. As such, nothing in the aesthetic impact discussion in this Initial Study shall trigger the need for any CEQA Findings of Fact, CEQA analysis, or CEQA mitigation measures.

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

a. Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. A scenic vista is a panoramic view of a valued visual resource.[9] Panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are typically associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies. Focal views are also relevant when considering this question from Appendix G of the CEQA Guidelines. Examples of focal views include natural landforms, public art/signs, historic buildings, and important trees.

With regard to panoramic views, valued visual resources in the vicinity of the Project Site include the downtown Los Angeles skyline, and structures that are considered historic resources. With regard to focal views, valued visual resources in the vicinity of the Project Site include the Downtown Los Angeles Industrial Historic District directly north of the Project Site, Industrial Street Historic Resources located

[9] City of Los Angeles, 2006 L.A. CEQA Thresholds Guide, p. A.2-1.

directly south of the Project Site, and Hills Bros. Office and Warehouse Historic District located directly east of the Project Site.[10]

In the immediate vicinity of the Project Site, public views of the downtown Los Angeles skyline are visible along Alameda Street, west of the Project Site; and along 6th Street, north of the Project Site. Panoramic views of the Los Angeles skyline are not available in the area adjacent to the Project Site due to distance and intervening development blocking large views of this visual resource. The Project would be implemented within the boundaries of the existing Project Site and views of the Los Angeles skyline would not be affected and would continue to be available on an intermittent basis along nearby roadway segments following development of the Project. Therefore, development of the Project would not have a substantial adverse effect on existing views of this visual resource across the Project Site.

With regard to focal views of nearby historic resources, the Project would be separated from the Downtown Los Angeles Industrial Historic District by East 6th Street, and views of this historic district would remain. Views of the Hills Bros. Office and Warehouse Historic District are primarily available from East 6th Street and would continue to be available with implementation of the Project. Views of this historic district along Mill Street are not available due to intervening development. Views of the Industrial Street Historic Resources are available from Industrial Street and Alameda Street and would continue to be available with implementation of the Project. Therefore, the Project would not have a substantial adverse effect on existing focal views of nearby historic resources. Refer to Checklist Section V, Cultural Resources, below for further discussion of the Project's potential effects to nearby historic resources.

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. Therefore, impacts related to a publicly available scenic vista would be less than significant, and no further evaluation of this topic in the EIR is required.

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

No Impact. The Project Site is not located along a state scenic highway. The nearest officially eligible state scenic highway is along the Foothill Freeway (I-210), approximately 15.5 miles north of the Project Site.[11] Therefore, the Project would not substantially damage scenic resources within a state scenic highway as no scenic highways are located adjacent to the Project Site. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impact would not be considered a significant impact on the environment. Therefore, no further evaluation of this topic in an EIR is required.

c. In non-urbanized areas, would the project 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?

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[10] City of Los Angeles, HistoricPlacesLA, http://historicplacesla.org/search, accessed August 18, 2022.

[11] California Department of Transportation, Scenic Highways, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed August 18, 2022.

Less Than Significant Impact. The Project is located in an urbanized area. As such, this analysis focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

Regarding zoning, as discussed in Section 3, Project Description, of this Initial Study, the Project Site is located within the Central City North Community Plan area and has a heavy manufacturing land use designation with the corresponding zone of M3-1-RIO (Heavy Industrial, Height District 1, River Improvement Overlay Zone). Pursuant to the LAMC, the M3 zone permits a wide array of heavy industrial uses including motion picture, television, video, and other media production uses. Height District 1, in conjunction with the M3 zone, does not impose a maximum building height limitation; however, pursuant to LAMC Section 12.21.1 A.1, the total floor area permitted is restricted to a maximum FAR of 1.5 times the property's buildable area.[12] The RIO designation indicates that the Project Site's location is in the Los Angeles River Implementation Overlay Zone. Pursuant to LAMC Section 13.17, projects in the Los Angeles River's outer core, including the Project, are required to comply with various screening standards and requires that new landscaping utilize native species.

As discussed in detail in Section 3, Project Description, of this Initial Study, the Project would replace the existing two warehouse structures with eight new soundstages with each soundstage containing two studios for a total of 16 studios, eight support structures adjacent to each soundstage, four new office buildings, and a publicly accessible parklet. The Project could also provide an area within the footprint of the enclosed mechanical platform along 6th Street, adjacent to the proposed parklet, that could be used by a potential retailer such as a café. The area for this space would be approximately 1,560 square feet. If this area is not used by a retailer, the area would be used to accommodate additional bicycle parking. A total of 1,317 vehicular parking spaces would be provided for the proposed uses within one partial below-grade parking level, surface parking, and within a narrow, single aisle, five-level parking structure. The proposed soundstage, production support, and office uses as well as the potential retail space/café would be consistent with the types of uses permitted in the M3 zone, which as discussed above, permits a wide array of industrial uses including motion picture, television, video, and other media production uses. The surrounding properties are also generally zoned M3. As such, the proposed uses would not degrade the existing visual character or quality of the area as the proposed uses would be consistent with other existing uses in the vicinity of the Project Site. As discussed above, Height District 1 typically does not impose a maximum building limitation, but rather permits a maximum FAR of 1.5 times the buildable area of the lot. Upon completion, the Project would result in a FAR of 1.06:1, which would be within the FAR permitted by the LAMC. In addition, the Project would incorporate appropriate landscaping features consistent with the requirements of the RIO.

With regard to other City 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, the Central City North Community Plan, and the Citywide Urban Design Guidelines. The Project's consistency with the general intent of these plans is briefly discussed below.

[12] FAR and height restrictions can be found at LAMC Section 12.21.1.A.1.

Citywide General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element) provides direction regarding the City's vision for future development and includes an Urban Form and Neighborhood Design Chapter to guide the design of future development. One of the key objectives of the Urban Form and Neighborhood Design Chapter is to enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm (Objective 5.5).[13]

The Project Site is currently occupied by two large warehouse structures consisting of approximately 311,000 square feet in a highly urbanized area that is generally developed with a variety of industrial uses. The Project would replace the existing warehouse structures currently used for storage and distribution purposes with a new soundstage production studio campus that would improve the quality of the public realm. Further, the Project's proposed design utilizes high quality materials, structures and landscaped common areas to create a unified and quality development. The Project would also incorporate design features that would enhance the public realm, create more effective transitions between off-site and on-site uses, and provide usable open space for the Project's patrons. Specifically, as discussed in Section 3, Project Description, of this Initial Study, landscaping and open space elements would be used to unify the various buildings and activities on the Project Site through a cohesive plant palette to be used along the streetscape, within the amenity deck, and within the roof decks of the proposed office buildings. Additionally, the Project would implement streetscape improvements that would create a cohesive visual identity for the Project Site and enhance the pedestrian experience, while providing for the unique security needs of a production studio. Landscaping elements would be incorporated along the perimeter of the Project Site including trees and shrubs, lighting, wayfinding signage, and potentially pedestrian amenities via a parklet near the intersection of 6th Street and Mill Street where a café could be provided.

Overall, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Urban Form and Neighborhood Design Chapter and, therefore, would not conflict with the Framework Element policies regarding scenic quality. Further discussion of the Project's consistency with applicable goals, objectives, and policies of the General Plan Framework Element will be included in the land use and planning section of the EIR.

Central City North Community Plan

As to scenic quality, the Central City North Community Plan includes the following commercial and industrial-related policies applicable to the Project:

- **Policy 2-1.4:** Require that projects be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses and development.
- **Policy 2-2.2:** New development needs to add to and enhance the existing pedestrian street activity.

[13] Los Angeles Department of City Planning, The Citywide General Plan Framework: An Element of the City of Los Angeles General Plan, Chapter 5, Urban Form and Neighborhood Design, re-adopted by City Council on August 8, 2001.

- **Policy 2-4.1:** Require that any proposed development be designed to enhance and be compatible with adjacent development.

- **Policy 2-4.2:** Preserve community character, scale, and architectural diversity.

- **Policy 3-1.3:** Require that any proposed development be designed to enhance and be compatible with adjacent development.

As previously discussed above, the Project would improve the public realmby replacing the existing warehouse structures currently used for storage and distribution purposes with a new production studio campus. In particular, the Project's proposed design utilizes high quality materials, structures, and landscaping to create a unified development that would result in a high quality. The Project would also incorporate design features that would enhance the public realm, create more effective transitions between off-site and on-site uses, and provide usable open space for Project patrons. Specifically, as discussed in Section 3, Project Description, of this Initial Study, landscaping and open space elements would be used to unify the various buildings and activities on the Project Site through a cohesive plant palette to be used along the streetscape, within the amenity deck, and within the roof decks of the proposed office buildings. Additionally, the Project would implement streetscape improvements that would create a cohesive visual identity for the Project Site and enhance the pedestrian experience, while providing for the unique security needs of a production studio. Landscaping elements would be incorporated along the perimeter of the Project Site including trees and shrubs, lighting, wayfinding signage, and potentially pedestrian amenities via a parklet near the intersection of 6th Street and Mill Street where a potential café could also be provided. Overall, relative to the surrounding development, the Project design would complement the varying design elements of the industrial, commercial, and residential uses adjacent to the Project Site.

Based on the above, the Project would not conflict with the Central City North Community Plan goals, objectives, and policies related to scenic quality.

Citywide Urban Design Guidelines

The Citywide Design Guidelines, adopted October 24, 2019, establish 10 guidelines to carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case. The Project would not conflict with the Citywide Design Guidelines, as discussed below.

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

The Project would be constructed within the boundaries of the Project Site and would not include the installation of barriers that would affect existing pedestrian mobility in the vicinity of the Project Site. In addition, the Project would comply with all applicable LAMC requirements regarding the provision of adequate sidewalks for pedestrian access. As discussed in Section 3, Project Description, of this Initial Study, the Project would also improve the pedestrian experience by including new landscaping along Alameda Street, 6th Street, and Mill Street. These perimeter areas would include landscaping such as street trees and shrubs, lighting, wayfinding signage, and potentially pedestrian amenities via a parklet near the intersection of 6th Street and Mill Street. Internal to the Project Site, the Project would include a landscaped amenity deck at the second level of the office buildings, which would connect the on-site

buildings and provide ample open space and pedestrian circulation for Project employees. Additionally, each of the office buildings fronting the surrounding streets along 6th Street, Alameda Street, and Mill Street would include large lobbies at the ground level to enhance pedestrian activity along those street frontages while maintaining essential security. Fencing, walls, landscaping, and other elements would be used to create a physical barrier at the perimeter of the Project Site to maintain the necessary privacy and security for certain production activities and ensure pedestrian safety. Thus, the Project would support this guideline.

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

As described in Section 3, Project Description, of this Initial Study, vehicular access to the Project Site would be provided from two large, gated driveways along 6th Street, and an additional non-truck vehicle driveway used for VIP access on Mill Street. The West Gate would be located between Soundstage Buildings 2 and 4, more than 200 feet from the 6th Street/Alameda Street intersection, and would provide a ramp down to the proposed subterranean parking level. The East Gate would be located between Soundstage Buildings 7 and 9, more than 200 feet from the 6th Street/Mill Street intersection, and would provide a ramp up from the proposed subterranean parking level. An LADWP-only access driveway would also be located along Alameda Street. Pedestrian-safety features would be incorporated at entrances/exists to minimize pedestrian-vehicular conflicts. Moreover, the Project design aims to reduce the number of curb cuts along 6th Street to minimize vehicle access to the Project Site, which would enhance the safety of Project Site users and improve the pedestrian realm along this street frontage. Thus, the Project would support this guideline.

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

As previously described above, the Project would improve the pedestrian experience by including new landscaping along Alameda Street, 6th Street, and Mill Street. These perimeter areas would include landscaping such as street trees and shrubs, lighting, wayfinding signage, and potentially pedestrian amenities via a parklet near the intersection of 6th Street and Mill Street where a potential café could also be provided. Additionally, each of the office buildings fronting the surrounding streets along 6th Street, Alameda Street, and Mill Street would include large lobbies at the ground level to enhance pedestrian activity and maintain human scale along those street frontages. Fencing, walls, landscaping, and other elements would be used to create a physical barrier at the perimeter of the Project Site to maintain the necessary privacy and security for certain production activities and ensure pedestrian safety. Overall, the Project would support this guideline.

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

The Project Site is located within the Central City North Community Plan area. The area surrounding the Project Site is highly urbanized and includes a mix of low to mid rise buildings containing a variety of industrial, commercial and residential uses. The surrounding properties are generally zoned M3, which is consistent with the zoning of the Project Site. The surrounding properties include a mixture of one-, two-, and three-story buildings with industrial uses integrated with other uses to the north of the Project Site across 6th Street, and a six-story building with mostly industrial use to the east of the Project Site across Mill Street. Other nearby uses include land zoned as PF comprised of an LA Metro bus storage facility to the west of the Project Site across Alameda Street, and additional seven-story structures and a 10-story

parking garage located across 7th Street from the LA Metro bus storage facility, which are part of the Row DTLA development. Additional land zoned M3 and C2-2D-RIO is located to the south of the Project Site, which are either vacant or include one- and two-story buildings. As described in Section 3, Project Description, of this Initial Study, the eight soundstages would each be one story and have a maximum height of 49 to 55 feet to the top of the parapet. Each of the production support buildings adjacent to the studio buildings would be three stories and would not exceed a height of 45 feet. The proposed office structures would each be five stories and up to 75 feet in height to the last occupiable floor (and a height up to 89 feet including mechanical equipment). As such, the Project's scale and density would be consistent with development patterns and projected growth in the surrounding area. Thus, the Project would support this guideline.

Guideline 5: Express a clear and coherent architectural idea

As discussed in Section 3, Project Description, of this Initial Study, the proposed design of the Project provides variable massing, materiality and texture on the public facing street façades. Layered in front of the soundstage walls, a custom metal cladding shields mechanical equipment and provides shelter to bicycle parking. At the mid-block on each side of the Project, high-quality, transparent and engaging storefront glazing clads the lobby of each creative office building at street level while glass and metal panels clad the upper levels. At the corner of Mill Street and 6th Street, a public parklet would be provided. On Alameda Street and Mill Street, planters would be sized appropriately to accommodate trees and screening plants directly adjacent to studio walls. Additional design materials such as murals and landscaping would be used to further enliven the appearance of these public-facing facades. These shorter façades also include the mid-block activation of the office lobbies and floors above by providing a break in the massing, providing pedestrian entrances along these streets, and locating rideshare drop-off areas along these frontages. The overall architectural idea is to provide a design that reflects a high quality studio campus that activates the streetscape and activates pedestrian use while maintaining the unique security needs of a studio campus. Based on the above, the Project would support this guideline.

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

The Project has been designed to enhance the public realm, create more effective transitions between off-site and on-site uses, and provide Project employees with usable on-site open space. The Project would incorporate streetscape improvements that would create a cohesive visual identity for the Project Site and enhance the pedestrian experience, while providing for the unique security needs of a production studio. As previously described above, the Project would improve the pedestrian experience by including new landscaping along Alameda Street, 6th Street, and Mill Street. These perimeter areas would include landscaping such as street trees and shrubs, lighting, wayfinding signage, and potentially pedestrian amenities via a public parklet at the corner of 6th Street and Mill Street where a café could also be provided. Additionally, each of the office buildings fronting the surrounding streets along 6th Street, Alameda Street, and Mill Street would include large lobbies at the ground level to enhance pedestrian activity and maintain human scale along those street frontages. Fencing, walls, landscaping, and other elements would be used to create a physical barrier at the perimeter of the Project Site to maintain the necessary privacy and security for certain production activities and ensure pedestrian safety. Thus, the Project would support this guideline.

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

As previously discussed, the Project would incorporate fencing, walls, landscaping, and other elements to create a physical barrier at the perimeter of the Project Site to maintain the necessary privacy and security for certain production activities as well as ensure pedestrian safety. The proposed office uses would be incorporated throughout the Project Site in such a way that would not disturb production studio operations. The common area walkways connecting amenity spaces and outdoor dining areas would connect the proposed buildings, enhancing the accessibility of the Project Site and activating the proposed production studio uses. Thus, the Project would support this guideline.

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

The Project Site is located in an urbanized area and is currently occupied by two large warehouse structures. Existing landscaping within the Project Site is limited. According to the Tree Inventory Report prepared for the Project included in Appendix IS-1 of this Initial Study, surrounding the Project Site are six trees within the public right-of-way. The inventoried trees include four *Padocarpus Macrophyllus* (Yew Pine) trees, one *Handroanthus Impetiginosus* (Pink Trumpet) tree, and one *Chilopsis Linearis* (Desert Willow) tree. None of these street trees are considered to be protected by the City of Los Angeles Protected Tree and Shrub ordinance No. 186,873. As part of the Project, the 6 existing trees along Alameda Street would be removed and replaced at a 2:1 ratio in accordance with City requirements. In addition, the Project would include the planting of additional street trees along the perimeter of the Project Site. Thus, the Project would support this guideline.

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

As discussed in Section 3, Project Description, of this Initial Study, the Project would support environmental sustainability by incorporating sustainable building features and construction protocols required by the Los Angeles Green Building Code (LAMC Chapter IX, Article 9), the California Green Building Standards Code (California Code of Regulations, Title 24, Part 11; referred to as the CALGreen Code), and the California Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6; California Energy Code). In compliance with existing Code requirements, a number of specific sustainable design components would be incorporated into the Project, potentially including, but not limited to: Energy Star appliances; solar panels; plumbing fixtures and fittings that comply with the performance requirements specified in the Los Angeles Green Building Code; weather-based irrigation systems; water-efficient plantings with drought-tolerant species; shade trees in public areas; green walls in some outdoor areas; vegetated roofs or cool roof systems to help reduce energy use; short- and long-term bicycle parking; use of daylighting where feasible; and energy-efficient lighting. Thus, the Project would support this guideline.

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

As discussed in more detail below (see Checklist Section X, Hydrology and Water Quality), per the Low Impact Development (LID) requirements, as determined by the City of Los Angeles Department of Public Works, Bureau of Sanitation, the Project would include one or more of the following BMPs to treat a "first flush" volume of runoff equal to the greater of an 85th Percentile 24-hour or 0.75-inch rainfall event (in priority order to the maximum extent feasible):

- Infiltration Systems
- Stormwater Capture and Use
- High-Efficient Biofiltration/Bioretention Systems

Infiltration is proposed for the Project Site. Site specific percolation testing will be further performed during the design phase of the Project to definitively determine the feasibility of infiltration. Should infiltration not be feasible for the Project Site, other BMP measures would be implemented in accordance with the City's LID requirements. Thus, the Project would support this Guideline.

In summary, for all the reasons stated 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 significant. Therefore, no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Nighttime illumination of varying intensities is characteristic of most urban land uses, including those in the vicinity of the Project Site. New light sources introduced by a project may increase ambient nighttime illumination levels. Additionally, nighttime spillover of light onto adjacent properties has the potential to interfere with certain functions, including vision, sleep, privacy, and general enjoyment of the natural nighttime condition. The significance of the impact depends on the type of use(s) affected, proximity to the affected use(s), the intensity of the light source, and the existing ambient light environment. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and institutional uses, and natural areas.

Glare occurs during both daytime and nighttime hours. Daytime glare is caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials, and, to a lesser degree, from broad expanses of light-colored surfaces. Daytime glare generation is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials from which the sun can reflect, particularly following sunrise and prior to sunset. Daytime glare generation is typically related to sun angles, although glare resulting from reflected sunlight can occur regularly at certain times of the year. Glare can also be produced during evening and nighttime hours by artificial light directed toward a light-sensitive land use.

Construction

While the majority of Project construction would occur during daylight hours, there is a potential that construction could occur in the evening hours and require the use of artificial lighting, particularly during the winter season when daylight is no longer sufficient earlier in the day. Outdoor lighting sources, such as floodlights, spot lights, and/or headlights associated with construction equipment and hauling trucks, typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary and would cease upon completion of Project construction. Furthermore, construction-related illumination would be used for safety and security purposes only, in

compliance with LAMC light intensity requirements.[14] Additionally, as part of the Project, construction lighting would be shielded to minimize the potential for light spillover to adjacent properties. Project construction lighting, while potentially bright, would be focused on the particular area undergoing work.

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

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

Operation

Low-level exterior lights would be provided to accent signage, architectural features, and landscaping elements. The Project would also include low-level exterior lights along pathways for aesthetic, security, and wayfinding purposes. In addition, low-level lighting to accent signage would be incorporated. All Project lighting would comply with current energy standards and codes while providing appropriate light levels to accent signage, architectural features, and landscaping elements. Light sources would be shielded and/or directed toward Project Site areas to minimize light spill-over to neighboring properties and the surrounding area while utilizing low-level exterior lights at the site perimeter, as needed, for aesthetic, security, and wayfinding purposes. Additionally, new street and pedestrian lighting within the public right-of-way would provide appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties, in compliance with applicable City regulations and with approval by the Bureau of Street Lighting.

Daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. In general, sun reflection that has the greatest potential to interfere with driving occurs from the lower stories of a structure. As illustrated in the renderings included in Section 3, Project Description, of this Initial Study, while the Project would include glass along various façades, use of glass would be limited to a portion of the Project Site given the unique security needs of a studio campus. In addition, glass used in building façades would be selected for qualities such as low reflectivity to reduce glare; energy efficiency to limit solar heat

[14] LAMC Chapter 9, Article 3, Section 93.0117(b) provides that no exterior light source may cause more than 2 foot-candles (21.5 lx) of light intensity or generate direct glare onto exterior glazed windows or glass doors; elevated porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any property containing a residential unit or units.

gain; high visibility for adequate light transmission; and acoustic performance to reduce noise from outside.

Nighttime glare could result primarily from on-site illumination and vehicle headlights. The Project's illuminated signs would not exceed the prescribed LAMC lighting requirements. Furthermore, while headlights from vehicles entering and exiting the Project Site would be visible during the evening and nighttime hours, such lighting sources would be typical for the area. Thus, nighttime glare would not result in a substantial adverse impact.

Based on the above, with adherence to regulatory requirements, lighting associated with Project operation would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetic impacts would not be considered significant. No further evaluation of this topic in an EIR is required.

II. AGRICULTURE AND FOREST 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?	☐	☐	☐	☒

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

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently occupied by two large warehouse structures. No agricultural uses or operations involving farmland occur on-site or in the vicinity of the Project Site. Furthermore, the Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.[15,16] As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no further evaluation of this topic in an EIR is required.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project Site is zoned M3-1-RIO (Heavy Industrial, Height District 1, River Improvement Overlay District). The Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area. Additionally, the Project Site and surrounding area are not enrolled under the California Land Conservation Act and are not subject to a Williamson Act Contract.[17] Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no further evaluation of this topic in an EIR is required.

c. Would the project 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. As previously discussed, the Project Site is located in an urbanized area and is currently occupied by two large warehouse structures. The Project Site does not include any forest land or

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15 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5164-010-003; -004; -005, http://zimas.lacity.org/, accessed August 18, 2022.

16 California Department of Conservation, California Important Farmland Finder, https://maps.conservation.ca.gov/DLRP/CIFF/App/index.html?marker=-118.29152006048791%2C34.02551004278704%2C%2C%2C%2C&markertemplate=%7B%22title%22%3A%22%22%2C%22longitude%22%3A-118.29152006048791%2C%22latitude%22%3A34.02551004278704%2C%22isIncludeShareUrl%22%3Atrue%7D&level=14, accessed August 18, 2022.

17 California Department of Conservation, The Williamson Act Status Report 2020–21, May 2022.

timberland. In addition, as discussed above, the Project Site is not zoned for forest land and is not used as forest land.[18] Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the PRC. No impacts would occur, and no further evaluation of this topic in an EIR is required.

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As previously discussed, the Project Site is located in an urbanized area and does not include any forest land. Therefore, the Project would not result in the loss or conversion of forest land to non-forest use. No impacts would occur, and no further evaluation of this topic in an EIR is required.

e. Would the project 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. As discussed above, the Project Site is located in an urbanized area of the City and does not include farmland or forest land. Furthermore, the Project Site and surrounding area are not mapped as farmland or forest land, are not zoned for farmland/agricultural use or forest land, and do not contain any agricultural or forest uses.[19] As such, the Project would not result in the conversion of farmland to non-agricultural use or in the conversion of forest land to non-forest use. No impacts would occur, and no further evaluation of this topic in an EIR is 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?	☒	☐	☐	☐

[18] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5164-010-003; -004; -005 http://zimas.lacity.org/, accessed August 15, 2022.

[19] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5164-010-003; -004; -005, http://zimas.lacity.org/, accessed August 15, 2022.

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

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [$PM_{2.5}$], and lead[20]). SCAQMD's 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.[21] With regard to future growth, SCAG has prepared their Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area. Construction and operation of the Project may result in an increase in stationary and mobile source air emissions. As a result, development of the Project could have a potential adverse effect on SCAQMD's implementation of the AQMP. Therefore, further evaluation of the Project's potential conflicts with the AQMP will be included in the EIR.

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

Potentially Significant Impact. As discussed above, construction and operation of the Project could result in the emission of air pollutants in the Basin, which is currently in non-attainment of federal air quality standards for ozone, $PM_{2.5}$ and lead, and state air quality standards for ozone, particulate matter less than 10 microns in size (PM_{10}), and $PM_{2.5}$. As a result, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Basin. Therefore, further evaluation of the Project's potential cumulative air pollutant emissions will be included in the EIR.

[20] Partial Nonattainment designation for lead for the Los Angeles County portion of the South Coast Air Basin only.

[21] SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. As discussed above, the Project could result in increased short- and long-term air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Sensitive receptors located in the vicinity of the Project Site include residential and educational uses. Therefore, further evaluation of the Project's potential to result in substantial adverse impacts to sensitive receptors will be included in the EIR.

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

Less Than Significant Impact. No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve operation of these types of uses. In addition, on-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

Construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.[22] In particular, Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.[23]

Based on the above, the Project would not result in other emissions such as those leading to odors. Impacts during construction and operation of the Project would be less than significant, and no further evaluation of this topic in an EIR is required.

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[22] SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/rules-compliance/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed August 18, 2022.

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

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 U.S. 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?	☐	☐	☐	☒

a. Would the project 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?

Less Than Significant Impact. The Project Site is located in an urbanized area and is currently occupied by two large warehouse structures. As described in Section 3, Project Description, of this Initial Study, the Project Site is relatively flat with limited ornamental landscaping. According to the Tree Inventory Report prepared for the Project included in Appendix IS-1 of this Initial Study, a total of six trees were identified surrounding the Project Site, all of which are located along Alameda Street. No on-site trees were observed. Due to the urbanized and disturbed nature of the Project Site and the surrounding

areas, along with the lack of large expanses of open space areas within and in the vicinity of the Project Site, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings. Based on the lack of habitat on the Project Site, it is unlikely any special status species listed by the California Department of Fish and Wildlife (CDFW)[24] or by the U.S. Fish and Wildlife Service (USFWS)[25] would be present on-site. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City of Los Angeles.[26] Additionally, the Project would include the planting of additional street trees along Alameda Street, Mill Street, and 6th Street and would replace the existing street trees along Alameda Street to be removed. Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW or USFWS. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

b. Would the project 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?

Less Than Significant Impact. The Project Site is located in an urbanized area and is currently occupied by two large warehouse structures. No riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area.[27,28] Furthermore, the Project Site and surroundings are not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.[29,30] There are no other sensitive natural communities identified by the CDFW or the USFWS.[31,32] Additionally, although the Project Site is in proximity to the Los Angeles River, development of the Project would not have an adverse effect on any riparian habitat in the Los Angeles River since the Project would not encroach into the Los Angeles River. Also, the portion of the Los Angeles River near the Project Site is concrete lined and the primary areas of the river that presently support riparian habitat are the Sepulveda Basin (approximately 25.5 miles northwest of the Project area) and the Glendale Narrows (approximately 7 miles north of the Project Site).[33] Therefore, the

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24 California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, April 2022.

25 United States Fish and Wildlife Service, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, https://ecos.fws.gov/ecp/report/species-listings-by-state?stateAbbrev=CA&stateName=California&statusCategory=Listed, accessed August 18, 2022.

26 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1C—Biological Resources Areas (Central Geographical Area), January 19, 1995, p. 2-18-5.

27 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5164-010-003; -004; -005, http://zimas.lacity.org/, accessed August 18, 2022.

28 United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed August 18, 2022.

29 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1C—Biological Resources Areas (Central Geographical Area), January 19, 1995, p. 2-18-5.

30 County of Los Angeles, Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

31 California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), Hollywood Quad Species List, https://apps.wildlife.ca.gov/bios/, accessed August 15, 2022.

32 California Department of Fish and Wildlife, CDFW Lands, https://apps.wildlife.ca.gov/lands/, accessed August 15, 2022.

33 City of Los Angeles, Los Angeles River Revitalization, Ecosystem, http://lariver.org/ecosystem, accessed February 2, 2018.

Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

c. Would the project 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?

Less Than Significant Impact. As discussed above, the Project Site is located in an urbanized area and is currently occupied by two large warehouse structures. In addition, the surrounding area has been fully developed, and the Los Angeles River located further east of the Project Site is concrete lined. No water bodies or state and federally protected wetlands exist on the Project Site.[34] As such, the Project would not have an adverse effect on state or federally protected wetlands. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

d. Would the project 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?

Less Than Significant Impact. As described above, the Project Site is located in an urbanized area and is currently occupied by two large warehouse structures. In addition, the areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within or surrounding the Project Site that provide linkages to natural open spaces areas which may serve as wildlife corridors. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.[35,36]

According to the Tree Inventory Report prepared for the Project included in Appendix IS-1 of this Initial Study, and as previously described, there are six non-protected trees located adjacent to the Project Site along Alameda Street, which would be removed as part of the Project. Although unlikely, these trees could potentially provide nesting sites for migratory birds. However, the Project would comply with the Migratory Bird Treaty Act (MBTA), which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. The Project would further comply with the MBTA regulations by conducting tree or vegetation removal activities outside of the nesting season (February 1–August 31), to the extent feasible, and, if tree or vegetation removal activities occur during the nesting season, the Applicant would retain a biological monitor during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and is based on the professional judgement of the monitoring biologist, in coordination with the CDFW, as appropriate. Additionally, California Fish and

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[34] United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed August 15, 2022.

[35] City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1C—Biological Resources Areas (Central Geographical Area), January 19, 1995, p. 2-18-5.

[36] County of Los Angeles, Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

Game Code Section 3503 states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." In addition, the Project would include replacement of the existing street trees to be removed at a 2:1 ratio in accordance with City requirements as well as the planting of additional street trees along 6th Street, Mill Street, and Alameda Street.

Overall, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The City of Los Angeles Protected Tree and Shrub Ordinance (Ordinance 186873, LAMC Chapter IV, Article 6) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, California Bay trees, Mexican Elderberry shrubs, and Toyon shrubs of at least 4 inches in diameter at breast height or 4.5 feet above the ground level at the base of the tree or shrub. These tree and shrub species are defined as "protected" by the City of Los Angeles. Trees or shrubs that have been planted as part of a tree planting program are exempt from the City's Protected Tree and Shrub Ordinance and are not considered protected. The City's Protected Tree and Shrub Ordinance prohibits, without a permit, the removal of any regulated protected tree, including "acts that inflict damage upon root system or other parts of the tree or shrub…" The protected tree or shrub must be replaced within the property by at least four specimens of a protected variety, except where the protected species is relocated pursuant to the LAMC. In addition, a protected tree shall only be replaced by other protected tree varieties and shall not be replaced by shrubs. A protected shrub shall only be replaced by other protected shrub varieties and shall not be replaced by trees, to the extent feasible as determined by the Advisory Agency, Board of Public Works, or a licensed or certified arborist.

According to the Tree Inventory Report prepared for the Project included in Appendix IS-1 of this Initial Study, there are no existing trees located within the Project Site. Surrounding the Project are six right-of-way trees, which are all located along Alameda Street. The inventoried trees include four *Padocarpus Macrophyllus* (Yew Pine) trees, one *Handroanthus Impetiginosus* (Pink Trumpet) tree, and one *Chilopsis Linearis* (Desert Willow) tree. None of the street trees are considered protected by the City of Los Angeles' Tree Preservation Ordinance No. 186,873. As part of the Project, the six existing street trees along Alameda Street would be removed. However, in accordance with City requirements, these trees would be replaced at a 2:1 ratio. In addition, the Project would include the planting of additional street trees along 6th Street, Mill Street, and Alameda Street. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required

f. Would the project 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. As described above, the Project Site is located in an urbanized area and is currently occupied by two large warehouse structures. No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.[37] Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No impact would occur, and no further evaluation of this topic in an EIR is required.

V. CULTURAL RESOURCES

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

The following analysis regarding archaeological resources is based on the Results of Archaeological and Ground Penetrating Radar Investigation (Archaeological and GPR Investigation) prepared by Dudek, dated September 2022. All specific information on archaeological resources in the discussion below is based on this report unless otherwise noted. The Archaeological and GPR Investigation is included as Appendix IS-2 of this Initial Study.

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

Potentially Significant Impact. Section 15064.5 of the CEQA Guidelines generally defines a historical resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to PRC Section 5020.1(k)); or (3) identified as significant in an historical resources survey (meeting the criteria in PRC Section 5024.1(g)). In addition, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register. The local register of historical resources is managed by the Los

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

Angeles Office of Historic Resources, which operates SurveyLA, a comprehensive program to identify significant historical resources throughout the City.

The Project Site is located adjacent to the Downtown Los Angeles Industrial Historic District. As such, further evaluation of the Project's potential impacts to historic resources will be provided in an EIR.

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

Less Than Significant Impact. CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within an urbanized area of the City and has been subject to grading, excavation and fill activities, and development in the past. Based on a records search conducted by the South Central Coastal Information Center (SCCIC) for the Project Site, as referenced in the Archaeological and GPR Investigation included in Appendix IS-2 of this Initial Study, no archeological resources were identified within the Project Site. Specifically, SCCIC records indicate that a total of 44 previously recorded cultural resources have been documented within the 0.5-mile records search buffer, none of which are within the Project Site. Additionally, while sections of the Zanja Network, specifically Zanja No. 2, has been mapped in the vicinity of the Project Site (approximately 0.85 mile and 2 miles north of the Project Site), it is unlikely that implementation of the Project could impact any extant Zanja segments. Based on the Archaeological and GPR Investigation included in Appendix IS-2 of this Initial Study, due to the nature of this feature, originally running along roads just below the ground surface, it is very unlikely that portions of the Zanja Madre, specifically Zanja No. 2, or subsequent offshoots would remain intact within the current Project Site given the severity of past subsurface disturbances involved in construction of the buildings that now occupy this parcel. As concluded in the Archaeological and GPR Investigation, GPR investigations did not result in any subsurface readings that would be consistent with the documented route or typical physical characteristics of zanja segments. Based on these results, and in consideration of the severity of past impacts to subsurface soils that would have occurred during construction of the large buildings already occupying the majority of the Project Site, it appears unlikely that any extant zanja segments or other intact cultural resources are present that could be impacted as a result of Project implementation. Thus, the Project would not be anticipated to result in a substantial adverse change in the significance of an archaeological resource. Nevertheless, the City has established a standard condition of approval to address inadvertent discovery of archaeological resources. Should archeological resources be inadvertently encountered, this condition of approval provides for temporary halting of construction activities near the encounter so the find can be evaluated. An archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the find. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements as set forth in CEQA Section 21083.2. Overall, with adherence to the City's condition of approval consistent with CEQA Section 21083.2, the Project would not cause a substantial adverse change in the significance of an archaeological resource. As such, impacts to archaeological resources would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. The Project Site is located in an urbanized area and has been subject to previous grading and development. In addition, as discussed in Section 3, Project Description, of this Initial Study, the Project would require limited excavation associated with the subterranean parking level, which would extend to a depth of approximately 11 feet. Therefore, the potential for uncovering human remains on the Project Site is low. Nevertheless, if human remains were discovered during construction of the Project, work in the immediate vicinity of the construction area would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determined the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the person or persons it believes to be most likely descended from the deceased Native American. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. Therefore, due to the low potential that any human remains are located on the Project Site, and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, the Project's impact related to human remains would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is 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?	☒	☐	☐	☐

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

Potentially Significant Impact. The Project would generate an increased demand for electricity and natural gas services provided by the Los Angeles Department of Water and Power (LADWP) and the Southern California Gas Company, respectively, compared to existing conditions. While development of the Project would not be anticipated to cause wasteful, inefficient, and unnecessary consumption of

energy resources due to compliance with existing regulations, further evaluation of the Project's demand on existing energy resources will be provided in the EIR.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Potentially Significant Impact. First established in 2002 under SB 1078, California's Renewables Portfolio Standard (RPS) is one of the most ambitious renewable energy standards in the country. The RPS program requires all electric load serving entities to procure 60 percent of its electricity portfolio from eligible renewable energy resources by 2030.[38] The LADWP provides electrical service throughout the City. LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources.

Regarding energy efficiency, the California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction, system design, and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2019 Title 24 standards, which became effective on January 1, 2020.[39] The 2019 Title 24 standards include efficiency improvements to the residential standards for attics, walls, water heating, and lighting and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1 2013 national standards.[40]

As previously described, the Project Site is currently occupied by two large warehouse structures. The Project Site does not include any renewable energy sources used by LADWP. 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. While the Project would not be anticipated to conflict with or obstruct a state or local plan for renewable energy or energy efficiency, further evaluation of the Project's compliance with LADWP's plans for renewable energy, as well as the Project's compliance with California Building Energy Efficiency Standards, will be provided in the EIR.

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38 CPUC, California Renewables Portfolio Standard (RPS) Program, www.cpuc.ca.gov/RPS_Overview/, accessed August 12, 2022.

39 CEC, 2019 Building Energy Efficiency Standards, www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency, accessed August 12, 2022.

40 CEC, 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, December 2018.

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 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.	☐	☐	☒	☐
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?	☐	☐	☒	☐
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 regarding geology and soils is based on the Geotechnical Desktop Review (Geotechnical Investigation) prepared by Langan, dated August 2022 as well as prior geotechnical evaluations performed for the Project Site as referenced by Langan in their Geotechnical Desktop Review. All specific information on geology and soils conditions on the Project Site in the discussion below is based on the Geotechnical Investigation and previously prepared reports referenced therein unless otherwise noted. The Geotechnical Investigation is included as Appendix IS-3 of this Initial Study.

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

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

Less Than Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), 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 11,700 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement within the last 1.6 million years. In addition, buried thrust faults, which are faults with no surface exposure, may exist in the vicinity of the Project Site; however, due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

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

Based on City data, the Project Site is not located within a City-designated Fault Rupture Study Area or an Alquist-Priolo Earthquake Fault Zone as mapped by CGS.[41] As discussed in the Geotechnical Investigation, the closest known active faults to the Project Site include the Hollywood Fault, mapped approximately 5.5 miles north of the Project Site; the Raymond Fault, mapped approximately 5.9 miles northeast of the Project Site; and the Newport-Inglewood Rose Canyon fault zone, mapped approximately 7 miles west of the Project Site. Therefore, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site, and the potential for surface rupture due to faulting occurring beneath the Project Site, is considered low. Thus, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death related to fault rupture. Impacts associated with surface rupture from a known earthquake fault would be less than significant, and no further evaluation of this topic is an EIR is required.

ii. Strong seismic ground?

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. As previously stated, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. The closest known active faults

[41] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5164-010-003; -004; -005, http://zimas.lacity.org/, accessed August 18, 2022.

to the Project Site include the Hollywood Fault, mapped approximately 5.5 miles north of the Project Site; the Raymond Fault, mapped approximately 5.9 miles northeast of the Project Site; and the Newport-Inglewood Rose Canyon fault zone, mapped approximately 7 miles west of the Project Site. State and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. Specifically, the state and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the California Building Code, the City's General Plan Safety Element, and the Los Angeles Building Code. Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction of the Project. Accordingly, the design and construction of the Project would comply with all applicable existing regulatory requirements, the applicable provisions of the Los Angeles Building Code relating to seismic safety, and the application of accepted and proven construction engineering practices, including the specific geotechnical design recommendations set forth for the Project in the Geotechnical Investigation.

Specifically, the Project would comply with the Los Angeles Building Code, which incorporates current seismic design provisions of the California Building Code, with City amendments, to minimize seismic impacts. The 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. 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 LADBS, including the recommendations provided in a final, site-specific geotechnical report subject to review and approval by LADBS. The final geotechnical report would include the recommendations of the Geotechnical Investigation and its final recommendations would be enforced by the LADBS for the construction of the Project. Through compliance with regulatory requirements, 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 related to strong seismic ground shaking. Thus, impacts related to strong seismic ground shaking would be less than significant, and no further evaluation of this topic is an EIR is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction potential is greatest where the groundwater level is shallow, and submerged loose, fine sands occur within a depth of about 50 feet or less. Liquefaction potential decreases as grain size and clay and gravel content increase. As ground acceleration and shaking duration increase during an earthquake, liquefaction potential increases. The Project Site is not located within an area identified by the City of Los Angeles, County of Los Angeles, or California Geological Survey as having a potential for liquefaction.[42,43] In addition, according to the Geotechnical Investigation, the historical high groundwater level at the Project Site is mapped at a depth of approximately 150 feet. As such, impacts regarding liquefaction would be less than significant, and no further evaluation of this topic in an EIR is required.

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42 Ibid.

43 California Geological Survey, Earthquake Zones of Required Investigation, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed August 18, 2022.

iv. Landslides?

No Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and the Project Site is generally characterized by relatively level topography. Given the largely impervious (developed/paved) nature of the Project Site, large areas of exposed soil or rocks that could slide or become loose are not present. In addition, the Project Site is not located in a landslide area as mapped by the State, nor is the Project Site mapped as a landslide area by the City of Los Angeles.[44,45,46] Therefore, the Project would not directly or indirectly cause potential substantial adverse effects involving landslides. As such, no impact would occur, and no further evaluation of this topic in an EIR is required.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Development of the Project would require grading, excavation, and other construction activities that have the potential to disturb existing soils within the Project Site and expose these soils to rainfall and wind during construction, thereby potentially resulting in soil erosion. This potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities during Project construction. Specifically, all grading activities would require grading permits from the City of Los Angeles Department of Building and Safety (LADBS), which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of LAMC Chapter IX, Article 1, which addresses grading, excavations, and fills. Furthermore, the Project would be required to comply with the City's LID ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Regarding soil erosion during Project operations, the potential for erosion is low since the Project Site would be fully developed and no soils would be left exposed. Therefore, with compliance with applicable regulatory requirements, the Project's potential impacts due to soil erosion or the loss of topsoil would be less than significant, and no further evaluation of this topic in an EIR is required.

c. Would the project 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?

Less Than Significant Impact. As discussed above, the Project Site is not located in a landslide area as mapped by the state, nor is the Project Site mapped as a landslide area by the City. In addition, the Project would not alter exposed soils on a hill, nor inject water into the soil upslope that could cause a landslide downhill. Therefore, no impact related to landslides would occur.

Liquefaction-related effects include lateral spreading. Since the Project Site is not located in an identified liquefiable area, the potential for lateral spreading would also be considered low. As such, the Project would not be located on a geologic unit or soil that is unstable, which could potentially result in lateral

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44 Ibid.

45 City of Los Angeles, 2018 Local Hazard Mitigation Plan, East LA APC, Figure 11-7, Landslide Susceptibility Zones, p. 247.

46 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5164-010-003; -004; -005, http://zimas.lacity.org/, accessed August 18, 2022.

spreading. Impacts related to lateral spreading would be less than significant, and no further evaluation of this topic in an EIR is required.

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the rapid and intensive withdrawal of subterranean fluids such as groundwater or oil. As discussed in Section 3, Project Description, of this Initial Study, below grade parking would extend to a maximum depth of approximately 11 feet. As discussed in the Geotechnical Investigation, the mapped historic-high groundwater level beneath the Project Site is approximately 150 feet below ground surface. Therefore, dewatering operations are not expected during construction. Moreover, no large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring, or is planned at the Project Site. Therefore, there is little to no potential for ground subsidence due to withdrawal of fluid or gas at the Project Site. As such, the Project would not be located on a geologic unit or soil that is unstable, which could potentially result in subsidence. Impacts related to subsidence would be less than significant, and no further evaluation of this topic in an EIR is required.

As discussed above, the Project Site is not located within an area susceptible to liquefaction. As such, the Project would not be located on a geologic unit or soil that is unstable, which could potentially result in liquefaction. Impacts associated with liquefaction would be less than significant, and no further evaluation of this topic in an EIR is required.

Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading.[47] According to the Geotechnical Investigation, soils underlying the Project Site include soils that are medium dense to very dense silty sands and sands. Therefore, due to the type and density of the soils underlying the Project Site, the Project Site soils would not be considered collapsible soils. As such, the Project would not be located on and or exacerbate 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 further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. The Project Site may contain soils that are considered to have a moderate to high expansive potential. Therefore, further evaluation of expansive soils will be provided in the EIR.

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

No Impact. The Project Site is located within a community served by existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of soils to support septic tanks or

[47] ScienceDirect, Expansive Soils, www.sciencedirect.com/topics/engineering/expansive-soil, accessed November 19, 2020.

alternative wastewater disposal systems. No impact would occur, and no further evaluation of this topic in an EIR is required.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Impact. No unique geologic features are located on-site. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Although the Project Site has been previously graded and developed, the Project would require grading and excavation of the Project Site, which could have the potential to disturb existing but undiscovered paleontological resources. Therefore, further evaluation of the Project's potential impacts to paleontological resources will be provided in the EIR.

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?	☒	☐	☐	☐

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

Potentially Significant Impact. Gases that trap heat in the atmosphere are called greenhouse gases (GHGs) since they have effects that are analogous to the way in which a greenhouse retains heat. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of greenhouse gases in the atmosphere affects the earth's temperature. The State of California has undertaken initiatives designed to address the effects of GHG emissions, and to establish targets and emission reduction strategies for greenhouse gas emissions in California. Activities associated with the Project, including construction and operational activities, could result in GHG emissions that may have a significant impact on the environment. Therefore, further evaluation of the Project's GHG emissions will be provided in the EIR.

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

Potentially Significant Impact. The Project would have the potential to emit GHGs. Therefore, further evaluation of Project-related emissions and associated emission reduction strategies to determine whether the Project conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs will be included in an EIR.

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 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 is based on the Phase I ESA prepared for the Project by SCS Engineers dated January 28, 2022, and the Methane Gas Assessment Report prepared by SCS Engineers dated April 8, 2022. All specific information on hazards and hazardous materials in the discussion below is from these reports unless otherwise noted. The Phase I ESA and the Methane Gas Assessment Report are included in Appendix IS-4 and in Appendix IS-5 of this Initial Study, respectively.

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

Less Than Significant Impact.

Construction

Typical of construction activities for development projects, during demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners would be routinely used on the Project Site. However, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials, including, but not limited to the Resource Conservation and Recovery Act, California Hazardous Waste Control Law, Federal and State Occupational Safety and Health Acts, SCAQMD rules, and permits and associated conditions issued by LADBS. These existing regulations are aimed at the amount of hazardous materials used, accident prevention, protection from exposure to specific chemicals, and the proper storage and disposal of hazardous materials. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. Accordingly, Project construction activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials during construction. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant and no further evaluation of this topic in the EIR is required.

Operation

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in commercial uses, including cleaning products, paints, and those used for maintenance of landscaping. The studio uses, in particular, could involve the use of hazardous materials such as paints, adhesives, aerosol spray paint, as well as other materials for production and set making. Such use would be consistent with that currently occurring at other commercial and studio developments. However, as with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with manufacturer's standards and all applicable federal, state, and local requirements, such as California Hazardous Waste Control Law, Federal and California Occupational Safety and Health Acts, the Emergency Planning and Community Right-to-Know Act (Superfund Amendments and Reauthorization Act, Title III), and Safe Drinking Water and Toxic Enforcement Act, and Uniform Fire Code. Therefore, with compliance with manufacturer's standards and all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during operation of the Project would be less than significant, and no further evaluation of this topic in the EIR is required.

b. Would the project 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. The existing and previous land uses within the Project Site were identified as part of the Phase I ESA to assess their potential to present concerns relative to the presence of hazards and/or the handling of hazardous materials. As discussed in the Phase I ESA, based on available historical sources (i.e., subject property summary findings, topographic maps, fire insurance maps, and aerial photographs, etc.), prior to the construction of the existing improvements, the Project Site was developed with mostly warehouse uses. Based on the records reviewed as part of the Phase I ESA, the Project Site contained a lumberyard and mill on the northern portion of the Project Site as early as the 1800s. Beginning in the early 1900s, additional buildings were developed along the southern portion of the Project Site. By the late 1900s, the Project Site was developed with a warehouse structure, although it is not the same as the current structures present on the Project Site. Based on aerial photography, two railroad spurs entering the Project Site from the northwest appeared to be in use as late as 1938. During the late 1940s and early 1950s, additional multi-tenant warehouse structures were developed. The present-day northern warehouse was developed in the early 1960s, with the present-day southern warehouse constructed in the early 1970s. Historical tenants have included chemical manufacturers, machine shop operators, and food and produce wholesalers. Current uses of the warehouse include storage, packaging, and shipping of produce such as fruit, vegetables, and flowers.

Based on a review of available documents and database records search, no Historical Recognized Environmental Conditions (HRECs), Recognized Environmental Conditions (RECs), or Controlled Recognized Environmental Conditions (CRECs) were identified in connection with the Project Site.

Provided below is a summary of the findings of the Phase I ESA as well as an evaluation of other potential hazardous materials that may be present on the Project Site during construction and operation of the Project.

Construction

Hazardous Waste Generation, Handling, and Disposal

During demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, could be used, and therefore, would require proper handling and management and, in some cases, disposal. The use, handling, storage, and disposal of these materials could increase the opportunity for hazardous materials releases and, subsequently, the exposure of people and the environment to hazardous materials. However, as previously discussed, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of potentially hazardous materials used during construction.

As discussed in the Phase I ESA, a prior soil and soil gas assessment of the Project Site was conducted by Leighton and Associates, Inc. (Leighton) to screen for the potential presence of hazardous substances and petroleum products in soil and soil gas (including methane) in the subsurface of the Project Site. As part of the Leighton investigation, soil samples were collected at depths of 2.5-, 5-, 10-, 15-, and 20-feet

below ground surface from six soil borings. As detailed in the Phase I ESA, based on the results of the soil and soil gas assessment, it was the opinion of Leighton that soil and soil gas in the areas of the historical machine shops and chemical manufacturing were not anticipated to pose significant risk to human health or explosion hazard. Additionally, Leighton concluded that additional investigation was not warranted. Therefore, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the handling and disposal of contaminated soil.

Based on the above, construction of the Project would not 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, and impacts associated with hazardous waste generation, handling, and disposal during construction would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Underground and Aboveground Storage Tanks

According to the Phase I ESA, two USTs were previously located on the Project Site, one 10,000-gallon diesel UST and one 10,000-gallon gasoline UST. Six soil samples were collected on May 23, 1990 from beneath the USTs and analyzed for total petroleum hydrocarbons and for the fuel constituents benzene, toluene, ethylbenzene, and total xylenes. All soil samples had non-detectable concentrations for all analytes. In addition, the Project Site does not appear as a LUST site on the GeoTracker website. Based on the available information and lack of evidence indicative of a release, the former USTs are not anticipated to negatively affect the environmental condition of the Project Site. There is no evidence of other underground storage tanks on the Project Site. With regard to aboveground storage tanks, the Phase I ESA states that no evidence of existing aboveground storage tanks were observed on the Project Site. Based on the above, the Project would not exacerbate hazardous conditions related to risk of upset and accident conditions associated with USTs or ASTS. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Asbestos-Containing Materials

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. Any building, structure, surface asphalt driveway, or parking lot constructed prior to 1979 could contain asbestos or Asbestos Containing Materials (ACMs). Based on an asbestos survey previously conducted in 1989 for the Project Site, positive asbestos results were detected in three types of floor tile and one type of sheet flooring. Additionally, a Phase I ESA was conducted in 2000 in which asbestos was detected in the roofing materials. However, the flooring and roofing materials in question have since been removed. Since remaining materials were observed in good condition, no further action is recommended at this time. Notwithstanding, removal of the existing structures during construction of the Project would occur in compliance with applicable regulations and requirements regarding asbestos-containing materials, including in accordance with SCAQMD Rule 1403, which would require that a comprehensive asbestos survey be conducted prior to demolition. In the event that ACMs are found within areas proposed for demolition, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable regulations. Overall, with compliance with existing regulatory requirements, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment. Therefore, with compliance with applicable regulations, the Project

would not 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. Impacts related to the removal of ACMs during demolition would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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. According to the Phase I ESA, based on the age of the Project Site, it is possible that lead-based paint has been used on the property in the past. However, apart from one area of damaged paint observed on the eastern exterior wall of the southern building, painted surfaces appear to be in good condition. In the event that LBP is found within areas proposed for demolition, 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, under the guidance of a Cal/OSHA-Certified Lead-Related Construction Inspector/Assessor. 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, with compliance with applicable regulations regarding the handling of lead-based products, 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. Impacts related to the removal of LBPs during demolition would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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. As discussed in the Phase I ESA, two pad-mounted LADWP transformers were observed at the Project Site near the southeastern and northwestern corners of the southern building. Additionally, three pole-mounted transformers were observed located at the northwestern corner of the northern building, and a total of 14 pole-mounted transformers are located along the adjoining sidewalks of Mill Street and 6th Street. However, no obvious indications of leaks or damage was observed in connection with the transformers. During demolition, 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. As such, with compliance with applicable regulations and requirements, the Project would not exacerbate the risk of upset and accident conditions associated

with PCBs. Therefore, impacts related to the removal of PCBs during demolition would be less than significant and no further evaluation of this topic in an EIR is required.

Oil Wells and Methane Gas

According to the Phase I ESA, a total of 10 oil and gas wells were found to be located within 1 mile of the Project Site. However, all 10 wells were identified as both dry and plugged, and no additional wells were identified within 1 mile of the Project Site. No oil and gas wells were identified on the Project Site. Therefore, no significant environmental impacts to the Project Site are anticipated from oil and gas wells in the vicinity of the Project Site. According to the Methane Gas Assessment Report prepared for the Project Site, while the Project Site is located within the City of Los Angeles Methane Buffer Zone, methane was not detected in any of the soil samples analyzed. Based on the Los Angeles Department of Building and Safety (LADBS) Mitigation Requirements for Methane Buffer Zone, no methane mitigation improvements are required. As such, the Project would not exacerbate the risk of upset or accident conditions associated with oil wells and methane gas. Impacts related to the removal of PCBs during demolition would be less than significant and no further evaluation of this topic in an EIR is required.

Operation

Hazardous Waste Generation, Handling, and Disposal

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in commercial uses. As stated previously, activities involving the handling and disposal of hazardous wastes would occur in compliance with all applicable federal, state, and local requirements concerning the handling and disposal of hazardous waste. Therefore, with compliance with applicable regulations and requirements, operational activities would not 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, and impacts associated with hazardous waste generation, handling, and disposal during operation of the Project would be less than significant. No further analysis of this topic in an EIR is required.

Underground and Aboveground Storage Tanks

Development of the Project includes a new production studio campus. The Project does not propose the installation of underground or aboveground storage tanks. As such, operation of the Project would not 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, and impacts associated with underground and aboveground storage tanks during operation of the Project would be less than significant. No further analysis of this topic in an EIR is required.

Asbestos-Containing Materials

Development of the Project would include the use of commercially-sold construction materials that would not include asbestos or ACMs. Project operation is, therefore, not anticipated to increase the occurrence of friable asbestos or ACMs at the Project Site. Therefore, operation of the Project would not 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, and no impacts associated

with asbestos or ACMs during operation of the Project would occur. No further analysis of this topic in an EIR is required.

Lead-Based Paint

Development of the Project would include the use of commercially-sold construction materials that would not include LBP. Project operation is, therefore, not anticipated to increase the occurrence of LBP at the Project Site. Operation of the Project would not expose people to LBP as no LBPs would be used. Thus, the Project would not 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, and impacts associated with LBP during operation of the Project would not occur. No further analysis of this topic in an EIR is required.

Polychlorinated Biphenyls

In accordance with existing regulations which ban the manufacture of PCBs, the new electrical systems to be installed as part of the Project would not contain PCBs. Therefore, during operation of the Project, maintenance of such electrical systems would not expose people to PCBs and operation of the Project would not expose people to any risk resulting from the release of PCBs in the environment. Therefore, the Project would not 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, and no impacts related to PCBs during Project operation would occur. No further analysis of this topic in an EIR is required.

Oil Wells and Methane Gas

The Project does not include the installation of oil wells. As such, operation of the Project would not 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, and no impacts associated with oil wells during operation would occur. The Project is not within a Methane Zone but is within a Methane Buffer Zone identified by the City. As discussed in the Methane Report prepared by SCS Engineers, the Project Site falls under Design Level II with 2 inches of water column. According to Section 91.7104.3.6 of the Los Angeles Municipal Code, a building located entirely or partially in the Methane Buffer Zone shall not be required to provide any methane mitigation system if the design methane pressure is less than or equal to 2 inches and it qualifies as Site Design Level I or II. Consequently, future buildings at the Project Site would not be required to provide methane mitigation or engineering controls. Therefore, there is a negligible risk of subsurface methane release. No further analysis of these topics in an EIR is required.

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

Less than Significant Impact. The nearest schools located in the vicinity of the Project Site include Para Los Niños Elementary School (0.3 mile south of the Project Site); Metropolitan High School (0.5 mile south of the Project Site); and 9th Street Elementary (0.7 mile east of the Project Site). As discussed above, the types and amounts of hazardous materials that would be used in connection with construction of the Project would be typical of those used during construction of commercial developments and would include fuels, paints, solvents, and concrete additives. Similarly, the types and amounts of hazardous

materials used during operation of the proposed uses would be typical of such developments and would include cleaning products, paints, and those used for landscaping maintenance. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations including, but not limited to, federal and state OSHA requirements, and would not create a significant hazard to nearby schools. As such, the Project's potential impacts associated with hazards emissions within 0.25 mile of an existing school would be less than significant, and no further evaluation of this topic in the EIR is required.

d. Would the project 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 create a significant hazard to the public or the environment?

Less Than Significant Impact. Section 65962.5 of the California Government Code requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While Section 65962.5 refers to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of multiple agencies including the Department of Toxic Substances Control (DTSC), the State Water Resources Control Board (SWRCB), and CalEPA.

As discussed in the Phase I ESA, the Project Site, formerly occupied by the Los Angeles Times at 1321 Wholesale Street, was listed on the RCRA Non-Generator database. However, due to the fact that the tenant is no longer present and no violations were reported, the listing of the Project Site on the RCRA Non-Generator database is not considered to be an environmental concern. Additionally, two adjacent parcels including Aesthetic Frame Design at 1275 East 6th Street and Union Central Cold Storage Inc. at 1525 Industrial Street were found to be listed on the federal RCRA Small-Quantity Generator database. However, no violations were reported, and based on the status/location with respect to the inferred groundwater gradient, the presence of the adjacent properties on the RCRA Small-Quantity Generator database is not considered to be an environmental concern.

The Project Site was also identified on the HIST, UST, CAL FID UST, and SWEEPS UST databases of registered USTs. As discussed in the Phase I ESA, the USTs were operated by Progressive Produce, formerly located on East 6th Street, and were removed in 1990. The Project Site is also listed on the HAZNET database as having generated manifested waste consisting of liquids with halogenated organic compounds and unspecified oil-containing waste. According to the Phase I ESA conducted on the Project Site in 2001, Progressive Produce formerly conducted truck repair activities on the Project Site. Therefore, it is likely that the halogenated organic wastes generated by Progressive Produce were spent solvents from a parts washer. Due to the fact that the listed tenant is no longer present, and the nature of the wastes generated, the HAZNETS listings are not considered to be an environmental concern.

Therefore, based on the above, the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard, and impacts regarding this threshold would be less than significant and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

Less Than Significant Impact. The Project Site is not located within 2 miles of an airport or within an airport planning area. The closest airport is the Los Angeles International Airport, which is located approximately 18.6 miles southwest of the Project Site. Given the distance between the Project Site and this airport, the Project would not have the potential to result in a safety hazard or excessive noise for people residing or working near an airport. Therefore, no impact would occur, and no further evaluation of this topic in the EIR is required.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. According to the City General Plan Safety Element, California Government Code Section 65302(g)(1) specifies the need to plan for swift evacuation in the event of a fire or other emergency. In response, the City includes a wide range of physical environments and dramatic differences in population density based on the time of day or day of the week. To better accommodate the variety of evacuation scenarios, the City has developed a dynamic approach to evacuation response, one that can respond to different conditions. As specified in the City EOP Evacuations Annex "primary evacuation routes consist of the major interstates, highways, and primary arterials within the City and Los Angeles County." However, in response to a more localized emergency, such as a hillside wildfire, the LAFD works in coordination with the Los Angeles Department of Transportation and Los Angeles Police Department to identify the most appropriate local egress option and direct individuals to those routes. Other routes are shared in real time depending on which disaster and suitable evacuation routes are identified.[48] While it is expected that the majority of construction activities for the Project would be confined to the Project Site, off site construction activities would occur in adjacent street rights-of-way, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would remain open such that at least one travel lane in each direction would be available. In the event of an emergency during construction of the Project, the LAFD and the LAPD would instruct businesses and residents of the area as to the specific evacuation plan as set forth in the Safety Element. The Applicant and construction contractor would comply with all instructions of the LAFD and LAPD as to evacuation requirements. In addition, while operation of the Project would generate traffic in the Project Site vicinity and would result in some modifications to the Project Site's access, the Project would comply with LAFD access requirements and would not impede emergency access in the Project Site vicinity. Therefore, the Project would not physically interfere with or impair the implementation of an emergency evacuation plan. The Project's potential impacts would be less than significant, and no further evaluation of this topic in the EIR is required.

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

No Impact. The Project Site is located in an urbanized, generally flat area, and there are no wildlands or steep slopes located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone, nor is it located within a City-designated fire buffer

[48] Los Angeles Safety Element, November 2021, p. 23.

zone.[49,50] Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. In particular, LAMC Section 57.106.5.2 provides that the Fire Chief shall have the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; LAMC Section 57.118 establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects; and LAMC Section 57.507.3.1 establishes fire water flow standards. In addition, the Project's proposed commercial uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, the Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death as a result of exposure to wildland fires. As such, no impact would occur, and no further evaluation of this topic in the EIR is required.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or 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?	☐	☐	☐	☒

[49] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5164-010-003; -004; -005 http://zimas.lacity.org/, accessed April 22, 2022.

[50] City of Los Angeles, 2018 Local Hazard Mitigation Plan, East Los Angeles APC, Figure 13-3, Wildlife Severity Zones, p. 278.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

The following analysis is based on the Hydrology and Water Resources Technical Report prepared for the Project by Langan Engineering, Environmental Surveying, Landscape Architecture and Geology, D.P.C., dated August 15, 2022. All specific information on hydrology and water quality in the discussion below is from this report unless otherwise noted. The Hydrology and Water Resources Technical Report is included as Appendix IS-6 of this Initial Study.

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. As discussed below, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Surface Water Quality

Construction

As discussed in the Hydrology and Water Resources Technical Report, construction activities such as earth moving, maintenance of construction equipment, handling of construction materials, and dewatering, can contribute to pollutant loading in stormwater runoff. Additionally, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as the construction site would be greater than one acre, the Project would be required to obtain coverage under the NPDES General Construction stormwater permit. In accordance with the requirements of this permit, the Project would implement a site-specific Stormwater Pollution Prevention Plan (SWPPP) that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC) that require necessary measures, plans, and inspections to reduce sedimentation and erosion.

Based on the above, with compliance with NPDES requirements and City's grading permit regulations, construction of the Project would not result in discharges that would violate any water quality standard or waste discharge requirements or otherwise substantially degrade surface water quality. Thus, temporary construction-related impacts on surface water quality would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

As discussed in the Hydrology and Water Resources Technical Report, the Project Site runoff leads into the Los Angeles River Reach 2. Constituents of concern listed for Los Angeles River Reach 2 under California's Clean Water Act Section 303(d) List includes trash, nutrients (algae), ammonia, indicator bacteria, oil, copper, and lead. Listed pollutants with TMDL include trash, nutrients (algae), ammonia, indicator bacteria, copper, and lead.

As is typical of most urban developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. Under Section 3.1.3 of the LID manual, 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 85th percentile storm event. The Project would incorporate appropriate LID BMPs in accordance with the City's LID Ordinance intended to control and treat stormwater runoff in compliance with LID. As stated in the Hydrology and Water Resources Technical Report, it appears that the Project Site currently discharges without any means of treatment. As such, implementation of LID BMPs as part of the Project would improve existing site conditions. As such, with the implementation of LID BMPs in compliance with the City's LID Ordinance and LID Manual, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. Impacts to surface water quality during operation of the Project would be less than significant, and no further evaluation of this topic in an EIR is required.

Groundwater Quality

Construction

As discussed in the Hydrology and Water Resources Technical Report, groundwater was not encountered to a depth of 46 feet and the historical high groundwater was reported at a depth of 150 feet. The Project would include excavations approximately 11 feet below ground surface to accommodate below grade parking. Based on the historically highest groundwater level and depth of proposed excavation, Project construction activities are not expected to encounter groundwater and temporary dewatering may not be required. In the event groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable NPDES requirements related to construction and discharges from dewatering operations.

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 that could percolate into groundwater. In addition, construction activities would not be expected to affect existing wells due to distance and limited excavation activities at the Project Site. Thus, construction of the Project would not result in any substantial increase in groundwater contamination through hazardous materials releases. Therefore, construction of the Project would not result in discharge that would violate any water quality standard or waste discharge requirements or otherwise substantially degrade groundwater quality. Impacts to

groundwater quality during operation of the Project would be less than significant, and no further evaluation of this topic is required in the EIR.

Operation

Operational activities which could affect groundwater quality include hazardous material spills and leaking underground storage tanks. No underground storage tanks are currently operated or will be operated by the Project. 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 standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Furthermore, operation of the Project would not require extraction from the groundwater supply based on the depth of excavation for the proposed uses and depth of groundwater below the Project Site. Additionally, the Project does not involve drilling to or through a clean or contaminated aquifer. Therefore, Project operations would not result in violations of any water quality standards or waste discharge requirements or otherwise substantially degrade groundwater quality. The Project's potential impact on groundwater quality operation would be less than significant, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As provided by the following analysis, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin.

Construction

No water supply wells are located at the Project Site or within 1 mile of the Project Site that could be impacted by construction, nor would the Project include the construction of water supply wells. As described in Section 3, Project Description, of this Initial Study, the Project would involve limited excavations approximately 11 feet below ground surface. As previously described, groundwater was not encountered to a depth of 46 feet and the historical high groundwater was reported at a depth of 150 feet. As the Project's proposed excavation would not be deeper than the historic high groundwater elevation, temporary dewatering is not expected during construction. If dewatering is required, the Project would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations. Due to the operation of dewatering systems being temporary, local groundwater hydrologic conditions, including groundwater production wells or public water supply wells within 1 mile of the Project Site, would not be affected by any unanticipated Project dewatering operations, and regional impacts to groundwater supplies and management of the basin would not be considered significant. Therefore, the Project's temporary construction activities would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts on groundwater supplies during construction of the Project would be less than significant, and no further evaluation of this topic in the EIR is required.

Operation

As discussed in the Hydrology and Water Resources Technical Report, the Project Site is approximately 98 percent impervious. Project implementation would maintain the same percentage of impervious area from the current condition of the Project Site while providing BMPs that would improve stormwater runoff from the Project Site. Specifically, while the Project would develop multiple buildings including subterranean parking and landscape amenity spaces which would create a post-Project condition of approximately 98 percent impervious surface area, due to the City's LID requirements, the Project is required to provide at least equivalent of 8 percent of the Project Site with landscape or biofiltration planters for treating the runoff water. With incorporation of BMPs to control and treat stormwater runoff, implementation of the Project could potentially increase groundwater recharge. The Project would not include the installation of water supply wells and there are no existing wells located at or within 1 mile of the Project Site. Therefore, Project operations would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant, and no further evaluation of this topic in the EIR is required.

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

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

Less Than Significant Impact.

Construction

The Project Site is not crossed by any water courses or rivers. Construction of the Project would involve the demolition of the existing warehouse structures and surface parking areas followed by grading and excavation activities. These activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. 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 also contribute to erosion. However, as discussed above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows from both stormwater and non-stormwater discharges. These BMPs would be designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. In addition, Project construction activities would occur in accordance with City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, through compliance with all NPDES General Construction Permit requirements, implementation of BMPs, as well as compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site's drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. As such, construction-related impacts to erosion and siltation would be less than significant, and no further evaluation of this topic in the EIR is required.

Operation

As previously discussed, with implementation of the Project, the percentage of impervious area from the current condition of the Project Site would be reduced. The Project would develop multiple buildings including subterranean parking and landscape amenity spaces which would create a post-Project condition of approximately 98 percent impervious surface area. Due to LID requirement, the Project is required to provide at least equivalent of 8 percent of the Project Site as landscape or biofiltration planters for treating the runoff water. Therefore, operation of the Project would not substantially alter the Project Site's drainage patterns in a matter that would result in substantial erosion or siltation on- or off- site. Operational impacts related to erosion and siltation would be less than significant, and no further evaluation of this topic in the EIR is required.

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

Less than Significant Impact.

Construction

As indicated above, there are no streams or rivers within or immediately surrounding the Project Site. Construction activities for the Project would involve removal of the existing warehouse structures and surface parking areas followed by grading and excavation. These activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. As noted above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows from both stormwater and non-stormwater discharges. These BMPs would be designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. Thus, through compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in increased runoff or flooding on- or off-site. As such, construction-related impacts associated with flooding from surface runoff would be less than significant, and no further evaluation of this topic in the EIR is required.

Operation

As previously discussed, with implementation of the Project, the percentage of impervious area from the current condition of the Project Site would be maintained while reducing stormwater runoff due to implementation of BMPs. As detailed in the Hydrology and Water Resources Technical Report, a comparison of pre- and post-Project peak flow rates indicate a decrease in stormwater runoff from the Project Site. In addition, the Project would comply with the City's LID Ordinance, which requires that 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 the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of infiltration BMPs as established by the LID Manual. Therefore, with implementation of BMPs, the Project would not increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Operational impacts associated with

flooding from surface runoff would be less than significant, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As detailed in the Hydrology and Water Resources Technical Report, a comparison of the pre- and post-Project peak flow rates indicates a decrease in stormwater runoff from the Project Site from 30.87 cubic feet per second under existing conditions to 30.16 cubic feet per second with implementation of the Project. In addition, the Project Site currently does not have BMPs for the management of pollutants or runoff. The BMPs implemented as part of the Project would control stormwater runoff and ultimately reduce or eliminate the discharge of potential pollutants from stormwater runoff. Furthermore, 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. Therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant, and no further evaluation of this topic in the EIR is required.

iv. Impede or redirect flood flows?

No Impact. The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City.[51,52] Thus, the Project would not impede or redirect flood flows. No impacts would occur, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed above, the Project Site is not located within a 100 year flood hazard area as mapped by FEMA or by the City. In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a tsunami hazard area.[53] Therefore, no tsunami or tsunami events would be expected to impact the Project Site and cause any discharge of pollutants. Additionally, there are no standing bodies of water near the Project Site that may experience a seiche, and therefore there is no significant risk that flows from a seiche could result in the discharge of any pollutants from the Project Site caused by the Project.

Earthquake-induced flooding can result from the failure of dams or other water-retaining structures resulting from earthquakes. According to the General Plan's Safety Element, the Project Site is mapped within an inundation area and the nearest levee is along the Los Angeles River located approximately 0.4 mile east of the Project Site. The U.S. Army Corps of Engineers operates and maintains the 22.5-mile stretch of the Los Angeles River between Lankershim Boulevard in Hollywood and Stuart and Grey Road

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51 Federal Emergency Management Agency, Flood Insurance Rate Maps, Panel Numbers 06037C1636G, effective December 21, 2018.

52 City of Los Angeles 2018 Local Hazard Mitigation Plan, Figure 10-2, Mapped Flood Areas in East Los Angeles APC, p. 207.

53 California Department of Conservation, Los Angeles County Tsunami Hazard Areas, www.conservation.ca.gov/cgs/tsunami/maps/los-angeles , accessed October 19, 2022.

in Downey, which includes the portion to the east of the Project Site. Their maintenance activities include inspection and cleaning of the channel walls and removing vegetation growing in cracks and joints. In addition, the U.S. Army Corps of Engineers has directed repair of damaged embankments upstream to the Project Site and has installed barriers for those portions of the channel that were identified as at greatest risk of flood waters during the 2015/2016 El Niño storm season. With continued inspection, maintenance and flood control activities, the potential for substantial adverse impacts related to inundation at the Project Site due to proximity to the Los Angeles River would be less than significant. No further evaluation of this topic in an EIR is required.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. Under Section 303(d) of the Clean Water Act, states are required to identify water bodies that do not meet their water quality standards. Biennially, the LARWQCB prepares a list of impaired waterbodies in that region, referred to as the 303(d) list. The 303(d) list outlines the impaired waterbody and the specific pollutant(s) for which it is impaired. All waterbodies on the 3030(d) list are subject to the development of a Total Maximum Daily Load (TMDL). As discussed in the Hydrology and Water Resources Technical Report, the Project Site is located within the Los Angeles River Watershed. According to the State Water Resources Control Board (SWRCB), constituents of concern listed for the Los Angeles River Watershed under California's Clean Water Act Section 303(d) List include pH, ammonia, a number of metals, coliform, trash, scum, algae, oil, chlorpyrifos as well as other pesticides, and volatile organics.

The County of Los Angeles, the City of Los Angeles, and all other cities in the Los Angeles Watershed are responsible for the implementation of watershed improvement plans or Enhanced Watershed Management Programs (EWMP) to improve water quality and assist in meeting the TMDL milestones. The objective of the EWMP Plan for the Los Angeles River is to determine the network of control measures (often referred to as best management practices) that will achieve required pollutant reductions while also providing multiple benefits to the community and leveraging sustainable green infrastructure practices.

Potential pollutants generated by the Project would be typical of commercial uses and may include sediment, nutrients, pesticides, trash and debris, oil and grease, and metals. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Since the existing Project Site does not have any structural or LID BMPs to treat or infiltrate stormwater, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. As such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans for the Los Angeles River Watershed. With compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant, and no further evaluation of this topic in an EIR is 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. Would the project physically divide an established community?

Less Than Significant Impact. The Project Site is located within the highly urbanized Central City North Community Plan area and is currently occupied by two large warehouse structures and surface parking areas. The area surrounding the Project Site is highly urbanized and includes a mix of low to mid rise buildings containing a variety of industrial, commercial, and residential uses. Land uses immediately surrounding the Project Site include a mixture of one-, two-, and three-story buildings to the north; a six-story building to the east; one- and two-story buildings to the south; and a LA Metro bus storage facility to the west.

The Project proposes the demolition of the existing warehouse structures for the construction of a new production studio campus. The Project Site would maintain its established zoning designation of M3-1-RIO and the proposed uses on the Project Site would be consistent with the mix of uses located adjacent to and in the general vicinity of the Project Site. Additionally, all proposed development would occur within the boundaries of the Project Site and would not include the closure of any surrounding travel routes. Furthermore, the Project does not propose a freeway or other large infrastructure that could divide the existing surrounding community. Access to all surrounding properties would continue to be available upon buildout of the Project. Therefore, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant, and no further evaluation of this topic in an EIR is required.

b. Would the project 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?

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project requires several discretionary approvals. Additionally, the Project could potentially conflict with land use plans, policies or regulations that were adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, further evaluation of this topic in an EIR is 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. Would the project 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. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone or Surface Mining District where significant mineral deposits are known to be present or within a mineral producing area as classified by the California Geologic Survey.[54,55] The Project Site is also not located within a City-designated oil field or oil drilling area.[56] Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no further evaluation of this topic in an EIR is required.

b. Would the project 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. Refer to Response to Checklist Question XII.a., Mineral Resources, above. No impact would occur, and no further evaluation of this topic in an EIR is required.

[54] City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

[55] State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2018.

[56] City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit E, November 26, 1996, p. 55.

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?	☐	☐	☐	☒

a. Would the project result in 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?

Potentially Significant Impact. During construction activities associated with the Project, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate noise on a short-term basis. In addition, noise levels from on-site sources may increase during operation of the Project. Furthermore, traffic attributable to the Project has the potential to increase noise levels along adjacent roadways. Therefore, further evaluation of this topic will be provided in the EIR.

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Due to the proposed land uses and vibration characteristics (rapid attenuation based on distance from source), operation of the Project would not be anticipated to result in operational vibration impacts. Construction of the Project could generate groundborne noise and vibration associated with demolition, site grading and excavation, other clearing activities, the installation of building footings, and construction truck travel. As such, the Project would have the potential to generate excessive groundborne vibration and noise levels during short-term construction activities. Therefore, further evaluation of this topic will be provided in the EIR.

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The Project Site is not located within the vicinity of a private airstrip or airport land use plan. The closest private airstrip or airport is the Los Angeles International Airport, which is located approximately 18.6 miles southwest of the Project Site. Given the distance between the Project Site and the nearest airport, the Project would not expose people residing or working in the Project area to excessive noise levels. Therefore, no impact would occur, and no further evaluation of this topic is 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. Would the project 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 may occur if a project induces a substantial unplanned population growth in an area, either directly or indirectly. As discussed in Section 3, Project Description, of this Initial Study, the Project does not include a housing component and thus would not directly introduce a new residential population that contributes to population growth in the vicinity of the Project Site or the Central City North Community Plan area.

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

Based on employee generation factors from the City of Los Angeles Department of Transportation (LADOT)'s Vehicle Miles Traveled Calculator, the Project is estimated to generate 2,392 net new

employees to the Project site.[57,58] According to SCAG's 2020-2045 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2022 is approximately 1,907,803 employees.[59] In 2026, the projected buildout year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,947,472 employees.[60] Therefore, the projected employment growth in the City between 2022 and 2026 based on SCAG's 2020–2045 RTP/SCS is approximately 39,669 employees. Thus, the Project's estimated 2,392 net new employees would constitute 6.03 percent of the employment growth forecasted between 2022 and 2026.

While some new Project employees may be anticipated to relocate to the Project vicinity, many would not, nor would existing employees be expected to move as a result of redevelopment of the Project Site. Accordingly, the potential indirect increase in population would not be substantial. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project Site, and other employees would be expected to commute to the Project Site from other communities both in and outside of the City, as occurs under existing conditions. Therefore, given that the Project would not directly contribute to substantial population growth in the Project area through the development of residential uses and since some of the employment opportunities generated by the Project could be filled by people already residing in the vicinity of the Project Site or others who would commute to the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Further, as the Project would be located in an urbanized area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth. Based on the above, the Project would not induce substantial population growth either directly or indirectly. Impacts would be less than significant, and no further evaluation of this topic is required in the EIR.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No impact. The Project Site is currently developed with two large warehouse structures with manufacturing and industrial uses. As no housing currently exists on the Project Site, the Project would not displace any existing persons or housing, or require the construction of replacement housing elsewhere. Therefore, the Project would not create any impacts related to displacement of people or housing, and no further evaluation of this topic in an EIR is required.

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57 LADOT and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. The existing warehouse structures to be removed produce approximately 103 employees (Warehouse 311,000 square feet * 0.00033 = 103). The Project would produce an estimated 2,495 employees (soundstages 308,829 square feet * 0.004 = 1,235) + (production support 102,460 square feet * 0.002 = 205) + (general office 261,326 square feet * 0.004 = 1,045) + (café 1,560 square feet * 0.0067 = 10). Accounting for the existing uses to be removed, the Project would produce an estimated 2,392 net new employees.

58 The existing occupied uses to be removed include two large warehouse structures with industrial and manufacturing uses.

59 SCAG. 2020-045 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, p. 35. Based on a linear interpolation of SCAG's employment data for 2016 (1,848,300) and 2045 (2,135,900). The 2022 value is extrapolated from 2016 and 2045 values: [(2,135,900 – 1,848,300) ÷ 29) * 6] + 1,848,300 = ~ 1,907,803.

60 SCAG. 2020-045 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, p. 35. Based on a linear interpolation of SCAG's employment data for 2016 (1,848,300) and 2045 (2,135,900). The 2026 value is extrapolated from 2016 and 2045 values: [(2,135,900 – 1,848,300) ÷ 29) * 10] + 1,848,300 = ~ 1,947,472.

XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☒	☐	☐	☐
b. Police protection?	☒	☐	☐	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?

Potentially Significant Impact. LAFD provides fire protection and emergency medical services for the Project Site. The Project would increase the floor area and associated occupancy on-site which could result in the need for additional fire protection services during Project operation. Additionally, construction sites can be sources of nuisances and hazards and invite theft and vandalism. Therefore, further analysis of potential impacts will be included in the EIR to determine if the Project would require new or physically altered government facilities resulting in adverse physical impacts.

b. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?

Potentially Significant Impact. Police protection for the Project Site is provided by the City of Los Angeles Police Department (LAPD). The Project would increase the floor area and associated occupancy on-site which could result in the need for additional police services during Project operation. Additionally, construction sites can be sources of nuisances and hazards and invite theft and vandalism. Therefore, the EIR will provide further analysis of potential impacts to determine if the Project would require new or physically altered government facilities resulting in adverse physical impacts.

c. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools?

Less Than Significant Impact. The Project Site is located within the boundaries of LAUSD, which is divided into six local districts. The Project Site is located in Local District (LD) East and is served by Hollenback Middle School, 9th Street Elementary, Theodore Roosevelt Senior High School, and Felicitas And Gonzalo Mendez Senior High School.[61,62]

Construction

The Project would generate part-time and full-time jobs associated with construction of the Project between the start of construction and Project buildout. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, which require construction workers to commute to job sites that change many times in the course of a year, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. In addition, construction workers would be more likely to utilize schools near their places of residence. Therefore, the construction employment generated by the Project would not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts on school facilities during Project construction would be less than significant, and no further evaluation of this topic in an EIR is required.

Operation

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of students within the service area of LAUSD. In addition, the number of students that may be indirectly generated by the Project that could attend LAUSD schools serving the Project Site would not be anticipated to be substantial because not all employees of the Project are likely to reside in the vicinity of the Project Site. Furthermore, pursuant to Senate Bill 50, the Project Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered full legal mitigation of Project-related school impacts. Thus, the Project would not result in the need for new or altered school facilities. Therefore, impacts on school facilities during Project operation would be less than significant, and no further evaluation of this topic in an EIR is required.

d. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for park services?

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61 Los Angeles Unified School District, Local District—East Map, https://achieve.lausd.net/site/handlers/filedownload.ashx?moduleinstanceid=22573&dataid=24307&FileName=East_2022-2023.pdf, accessed August 17, 2022.

62 Los Angeles Unified School District, School Finder, https://explorelausd.schoolmint.net/school-finder/home, accessed August 17, 2022.

Less Than Significant Impact. Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. Nearby public parks and recreational facilities within an approximate 2-mile radius include Gladys Park (0.76 mile), Arts District Park (0.83 mile), San Julian Park (1.09 miles), Spring Street Park (1.4 miles), and the Hollenback Recreation Center (1.44 miles).

Construction

Given the temporary nature of construction activities, construction of a project would not introduce a permanent population to an area which could result in an increase in the use of existing parks and recreational facilities that would result in the need for new parks and recreational facilities or the expansion of existing facilities. Additionally, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Additionally, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, which require construction workers to commute to job sites that change many times in the course of a year, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. Thus, construction of the Project would not generate a demand for park facilities that cannot be adequately accommodated by existing or planned facilities and services. Therefore, the construction workers associated with the Project would not result in a notable increase in the residential population within the vicinity of the Project Site, which would result in a corresponding permanent demand for parks in the vicinity of the Project Site. Impacts on parks during Project construction would be less than significant and no further evaluation of this topic in an EIR is required.

Operation

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create an additional demand for parks. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks. In addition, Project employees would be more likely to use parks near their homes during non-work hours.

As discussed in Section 3, Project Description, of this Initial Study, landscaping and open space elements would be used to unify the various buildings and activities on the Project Site through a cohesive plant palette to be used along the streetscape, within the amenity deck, and within the roof decks of the proposed office buildings. At the corner of Mill Street and 6th Street, a public parklet would be provided. In addition, the Project would include a landscaped amenity deck at the second level of the office building, which would connect the buildings and provide pedestrian circulation as well as ample open space for use by employees. Landscaped roof decks within each of the four office buildings would also be provided. As such, the Project's on-site open space would help to offset the demand for off-site parks and recreational facilities that could occur from the Project's net new employees. Thus, the Project would not result in the need for new or altered park facilities, or substantially increase the demand for parks. The Project's

impacts on parks during Project operation would be less than significant, and no further evaluation of this topic in an EIR is required.

e. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?

Less Than Significant Impact. Other public facilities provided to the Project Site include library services. The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles through its Central Library, 72 branch libraries, as well as through Web-based resources.[63] The Project area is served by existing LAPL facilities within the Central City North Community Plan area, including the Robert Louis Stevenson branch library (2.7 miles east), Little Tokyo Branch Library (1.2 miles north), Benjamin Franklin Branch Library (1.9 miles east), Central Library (1.7 miles west), and Chinatown Branch Library (1.9 miles north).[64]

Construction

As previously discussed, construction of the Project would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of Project construction. In addition, construction workers would be more likely to use libraries near their places of residence during non-work hours. Therefore, Project-related construction workers would not result in a notable increase in the resident population within the service area of either library serving the Project Site or an overall corresponding demand for library services in the vicinity of the Project Site. As such, construction of the Project would not exceed the capacity of local libraries to adequately serve the existing residential population based on target service populations or as defined by the LAPL. Project construction would not substantially increase the demand for library services for which current demand exceeds the ability of the facility to adequately serve the population. Therefore, impacts on library facilities during Project construction would be less than significant, and no further evaluation of this topic in an EIR is required.

Operation

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of residents within the service population of the local LAPL facilities. In addition, Project employees would have internet access to LAPL and other web-based resources, decreasing the demand on library facilities. Furthermore, as Project employees would be more likely to use library facilities near their homes during non-work hours and given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library

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63 Los Angeles Public Library Strategic Plan, 2015–2020.

64 Los Angeles Public Library, Branch Map, https://lapl.org/branches?distance%5Bpostal_code%5D=90021&distance%5Bsearch_distance%5D=3&distance%5Bsearch_units%5D=mile, accessed August 17, 2022.

services. Therefore, impacts on library facilities during Project operation would be less than significant, and no further evaluation of this topic in an EIR is 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 facility would occur or be accelerated?

Less Than Significant Impact. As discussed above in Response to Checklist Question XV.d., the Project would not generate a new residential population that would regularly utilize nearby parks and recreational facilities, and any use of local parks and recreational facilities is anticipated to be limited. The new employment opportunities generated by the Project may be filled, at least in part, by employees presently residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of new Project employees would be expected to create new demand for local parks and recreational facilities, and such use is anticipated to be limited due to work obligations and the travel time necessary to access off-site parks and recreational facilities. In addition, Project employees are often more likely to use parks and facilities near their homes during non-work hours. Furthermore, the Project proposes on-site open space areas and may include an amenity deck and on-site parklet for Project employees, thus reducing the likelihood that employees would use local parks and recreational facilities. Therefore, impacts related to parks and recreational facilities would be less than significant, and no further analysis of this topic in the EIR is 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. As discussed above in Response to Checklist Question XV.d., the Project would not generate a new residential population that would regularly utilize nearby public parks and recreational facilities and would not require construction or expansion of public recreational facilities. While the Project would include a publicly-accessible parklet at the corner of 6th Street and Mill Street, the proposed parklet would be limited to a small portion of the Project Site. Any construction- and operation-related impacts associated with provision of the proposed parklet would be subsumed into the overall analysis of Project impacts. Notwithstanding, given the limited size of the proposed parklet, the proposed parklet on its own would not be anticipated to result in adverse physical impacts on the

environment. Therefore, impacts with respect to the construction or expansion of recreational facilities would be less than significant, and no further evaluation of this topic in an EIR is 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?	☒	☐	☐	☐

a. Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Potentially Significant Impact. The City requires the preparation and submission of a Transportation Assessment for projects that meet the following criteria:

- If the project is estimated to generate a net increase of 250 or more daily vehicle trips and requires discretionary action, a transportation assessment for a Development Project is required.
- If a project is likely to either: (1) induce additional vehicle miles traveled by increasing vehicle capacity; or (2) reduce roadway through-lane capacity on a street that exceeds 750 vehicles per hour per lane for at least two (2) consecutive hours in a 24-hour period after the project is completed, a transportation assessment is generally required.
- A transportation assessment is required by City ordinance or regulation.

As described in Section 3, Project Description, of this Initial Study, the Project would introduce new uses to the Project Site and would increase the floor area over existing conditions. As such, the Project would meet the above criteria for preparation of Transportation Assessment. A Transportation Assessment in accordance with LADOT's Transportation Assessment Guidelines (TAG) will be prepared for the Project. In accordance with the TAG and consistent with the City CEQA Transportation Thresholds (adopted July 30, 2019), the transportation assessment's CEQA-required analyses will include an assessment of whether the Project would result in potential conflicts with transportation-related plans, ordinances, or policies. Therefore, further evaluation of this topic will be included in the EIR.

b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Potentially Significant Impact. SB 743, which went into effect in January 2014, requires the Governor's Office of Planning and Research to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis has shifted from driver delay, which is typically measured by traffic level of service (LOS), to a new measurement that better addresses the State's goals on reduction of greenhouse gas emissions, creation of a multi-modal transportation, and promotion of mixed-use developments. CEQA Guidelines Section 15064.3 states that vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts, replacing LOS.

On July 30, 2019, the City adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its TAG, which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743. The Project would develop new office and studio uses on the Project Site. As a result, VMT would increase over existing conditions. Therefore, further evaluation of this topic will be provided in the EIR.

c. Would the project 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. The Project's design does not include hazardous geometric design features (e.g., sharp curves or dangerous intersections). The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections, and the development of the Project would not result in roadway modifications such that safety hazards would be introduced adjacent to the Project Site. In addition, the proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access such that the proposed driveways would not create hazards to the surrounding streets. The proposed uses would also be consistent with the surrounding uses (i.e., residential and commercial) and would not introduce hazards due to incompatible uses. Thus, the Project would not substantially increase hazards due to a geometric design feature or incompatible uses. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

d. Would the project result in inadequate emergency access?

Potentially Significant Impact. Project construction would require temporary lane closures. While not anticipated to result in inadequate emergency access, this topic would be evaluated further in conjunction with the Project's evaluation of potential impacts related to fire and police protection services that would include an analysis of potential impacts to emergency access.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is

geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☒	☐	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Potentially Significant Impact (a and b). Assembly Bill (AB) 52 established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in PRC Section 21074. As specified by AB 52, a lead agency must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As previously discussed, the Project would require excavations that extend approximately 11 feet below ground surface. As such, construction activities could potentially disturb any existing but undiscovered

tribal cultural resources. Therefore, the potential exists for the Project to impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. Further analysis of this topic will be provided in the EIR.

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?	☐	☐	☒	☐

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Potentially Significant Impact. Water, wastewater, electric power, and natural gas systems consist of two components, the source of the supply or place of treatment (for wastewater) and the conveyance systems (i.e., distribution lines and mains), which link the location of these facilities to an individual development site. Given the Project's increase in floor area within the Project Site and the potential corresponding increase in water, electricity, and natural gas demand and wastewater generation, further analysis of these topics will be provided in the EIR.

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Potentially Significant Impact. LADWP supplies water to the Project Site. Given the Project's increase in floor area on the Project Site and the associated employee population, the Project would increase demand for water provided by LADWP. Therefore, further evaluation of this topic will be provided in the EIR.

c. Would the project 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?

Potentially Significant Impact. Refer to Response to Checklist Question XIX.a. above. As discussed therein, the Project would result in an increase in wastewater generation from the Project Site. Therefore, further evaluation of this topic will be provided in the EIR.

d. Would the project 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. While the LASAN generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential, commercial and institutional developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the Los Angeles County are categorized as either Class III (e.g., landfills permitted to accept non-hazardous and non-designated solid waste) or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, is disposed of in inert waste landfills.[65] Ten Class III landfills and one inert landfill are currently operating within the County.[66] In addition, there is one solid waste transformation facility within Los Angeles County (Southeast Resource Recovery Facility) that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery.[67]

Based on the 2020 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the most recent report available, the total remaining permitted Class III landfill capacity in the County is estimated at 142.67 million tons, with a total estimated daily disposal rate of 36,544 tons per day, and the remaining lifespan of each landfill ranges from 8 to 35 years. The estimated remaining capacity for the County's Class III landfills open to the City of Los Angeles is approximately 132.58 million tons as of December 31,

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65 Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples include sand and concrete.

66 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021. The ten Class III landfills serving the County include the Antelope Valley Landfill, Burbank Landfill, Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, San Clemente Landfill, Whittier (Savage Canyon) Landfill, Scholl Canyon Landfill, and Sunshine Canyon City/County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

67 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021.

2020.[68] In addition, the permitted inert waste landfill serving the County is Azusa Land Reclamation.[69] This facility has 64.64 million tons of remaining capacity and an average daily in-County disposal rate of 1,032 tons per day.[70] Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the 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.[71]

The following analysis quantifies the Project's construction and operational solid waste generation.

Construction

As summarized in Table 2 on page 83, to provide for the proposed improvements, the Project would remove approximately 311,000 square feet of existing warehousing uses and construct a new production studio campus including 308,829 square feet of soundstages; 102,460 square feet of production support uses; and 261,326 square feet of general office uses. Pursuant to the requirements of SB 1374,[72] the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of its non-hazardous demolition and construction debris. In addition, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. As discussed above, non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, is disposed of in inert waste landfills. Thus, although the total diversion rate may ultimately exceed 75 percent, this analysis conservatively assumes a diversion rate of 75 percent.

After accounting for mandatory recycling, as shown in Table 2, the Project would result in approximately 6,353 tons of construction and demolition waste. This amount of construction and debris waste would represent approximately 0.0001 percent of the Azusa Land Reclamation Landfill's remaining disposal capacity of 64.64 million tons.[73] It should be noted that soil export is not included in the calculation of construction waste since soil is not disposed of as waste but, rather, is typically used as a cover material or fill at other construction sites requiring soils import. As reported above, the Azusa Land Reclamation

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68 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020, Appendix E-2 Table 4. This total excludes Class III landfills not open to the City of Los Angeles for disposal (i.e., Scholl Canyon, Whittier, Burbank, Pebbly Beach, and San Clemente). In addition, this total excludes the Calabasas Landfill, as its wasteshed does not include the Project Site.

69 As of 2020, according to the Los Angeles County Integrated Waste Management Plan 2020 Annual Report, the Azusa Land Reclamation facility is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

70 County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021.

71 County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2020 Annual Report, October 2021.

72 Senate Bill 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills.

73 (6,353 tons ÷ 64.64 million tons) * 100 = 0.0001 percent.

Table 2
Estimated Project Construction and Demolition Waste Generation and Disposal

Land Use	Size	Generation Rate (lbs/sf)[a]	Total (tons)
Construction Waste (Proposed Uses)			
Soundstages	308,829 sf	3.89	601
Production Support	102,460 sf	3.89	199
General Office	261,326 sf	3.89	508
Café	1,560 sf	3.89	3
Demolition Waste (Existing Uses to be Removed)			
Warehousing/Self-Storage	311,000	155	24,103
Total Construction and Demolition Waste			**25,414**
Total Disposal (After 75% Diversion)			**6,353**

lbs = pound

sf = square feet

[a] *U.S. Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 4 and Table 6. Generation rates used in this analysis are based on an average of various non-residential building types.*

Source: Eyestone Environmental, 2022.

landfill, the County's inert waste landfill, would be able to accommodate waste from the Project's construction activities.

Based on the above, Project construction would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals and strategies identified in the ColWMP or by the City (refer to Response to Question No. XIX(e) regarding consistency with City solid waste planning goals). Therefore, the Project's potential construction-related impacts on solid waste facilities would be less than significant, and no mitigation measures would be required.

Operation

As shown in Table 3 on page 84, based on solid waste generation factors from LASAN, the Project would generate approximately 1,526 net tons of solid waste per year. The estimated amount of solid waste is conservative because the waste generation factors do not account for recycling or other waste diversion measures. For example, the estimate does not account for AB 939, which requires California cities, counties, and approved regional solid waste management agencies responsible for enacting plans and implementing programs to divert 50 percent of their solid waste away from landfills. The estimate also does not account for compliance with AB 341, which requires California commercial enterprises and public entities that generate 4 or more cubic yards per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's recycLA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.

Table 3
Estimated Project Operational Solid Waste Generation and Disposal

Building	Size	Employee Generation Rate per sf[a]	Estimated No. of Employees	Solid Waste Generation Rate[b]	Total Generation (tons/year)
Existing Uses					
Warehousing/Self-Storage	311,000	0.00033	103 emp	1.87 tn/emp/yr	193
Total Existing					*193*
Proposed Uses (Buildout)					
Sound Stages	308,829 sf	0.004	1,235 emp	0.92 tn/emp/yr	1,136
Production Support	102,460 sf	0.002	205 emp	0.91 tn/emp/yr	187
General Office	261,326 sf	0.004	1,045 emp	0.37 tn/emp/yr	387
Café	1,560 sf	0.0067	10 emp	0.91 tn/emp/yr	9
Total Project	*674,175 sf*				1,719
Total Net Increase					**1,526**

sf = square feet

emp = employee

tn/emp/yr = tons per employee per year

[a] *Project employee generation rates from Los Angeles Departments of Transportation and City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. Assumes general retail rate for production support and general office rate for sound stages and general office.*

[b] *Solid waste generation rates from LASAN City Waste Characterization and Quantification Study, Table 4, July 2002. Assumes services—motion picture for sound stages; retail—miscellaneous rate for production support; and services—business rate for general office.*

Source: Eyestone Environmental, 2022.

The Project's estimated solid waste disposal of 1,526 net tons per year represents approximately 0.0012 percent of the remaining capacity (132.58 million tons) at the County's Class III landfills that serve the City.[74] The Project's estimated solid waste generation would therefore represent a nominal percentage of the remaining daily disposal capacity of those landfills. As such, Project operation 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 or strategies identified in the ColWMP or by the City (refer to Response to Question No. XIX(e) regarding consistency with City solid waste planning goals). Therefore, the Project's potential construction impacts to solid waste facilities would be less than significant, and no mitigation measures would be required.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation

[74] (1,526 tons per year ÷ 132.58 million tons) * 100 = 0.0012 percent.

through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate 4 cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste[75] on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate 8 cubic yards of organic waste per week were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate 4 cubic yards of organic waste per week were required to arrange for organic waste recycling services.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.[76] The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste, impacts would be less than significant, and no further evaluation of this topic in an EIR is 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?	☐	☐	☐	☒

[75] Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. As discussed above, the Project Site is located in an urbanized area and is developed with relatively flat topography. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone.[77,78] Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones and would not result in impacts related to impairing an adopted emergency response plan or emergency evaluation plan within a wildfire area. No impacts regarding wildfire risks or related post-fire conditions would occur, and no further evaluation of this topic in the EIR is required.

b. Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. As discussed above, the Project Site is relatively flat and is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone. In addition, there is no accumulation of dry vegetation within the Project Site to fuel wildfires, or wildlands or steep slopes located in the vicinity of the Project Site or frequent strong wind events to exacerbate wildfires. Therefore, as the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones and due to the flat topography of the Project Site and surrounding area, the Project would not result in impacts related to exacerbating wildfire risks. No impacts regarding wildfire risks or related post-fire conditions would occur, and no further evaluation of this topic in the EIR is required.

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77 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5164-010-003; -004; -005, http://zimas.lacity.org/, accessed August 18, 2022.

c. Would the project 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?

No Impact. As discussed above, the Project Site is located in an urbanized area, and is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone. As the Project Site is not located within or near state responsibility areas or lands classified as very high fire hazard severity zones, the Project would not require the installation or maintenance of associated infrastructure such as roads, fuel breaks, or emergency water sources to assist with fire suppression in a wildfire area. Therefore, while the Project could require utility improvements to connect the new buildings to the main infrastructure, such improvements would not be located within or near state responsibility areas or lands classified as very high fire hazard severity zones and would not be considered wildfire area associated infrastructure. No impacts regarding wildfire risks or related post-fire conditions would occur, and no further evaluation of this topic in the EIR is required.

d. Would the project 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. As previously described, the Project Site is relatively flat and is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone. Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. As such, a wildfire which could result in downstream flooding, landslides, runoff, or other post-fire instability after the wildfire has been extinguished could not occur at the Project Site as no such conditions exist on the Project Site. No impacts regarding wildfire risks or related post-fire conditions such as landslides or slope instability would occur, and no further evaluation of this topic in the EIR is 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?	☒	☐	☐	☐

(Footnote continued from previous page)

[78] City of Los Angeles, 2018 Local Hazard Mitigation Plan, East Los Angeles APC, Figure 13-3, Wildfire Severity Zones, p. 278.

	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?

Potentially Significant Impact. As discussed above, the Project Site is located in a highly urbanized area and does not serve as habitat for fish or wildlife species. In addition, no sensitive plant or animal community or special status species occur on the Project Site. Therefore, the Project would not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal.

The Project would also comply with applicable regulatory requirements with regard to archaeological resources and would incorporate the City's standard Condition of Approval regarding the inadvertent discovery of such resources to ensure the appropriate handling of such resources.

As previously described, the Project Site is located adjacent to the Downtown Los Angeles Industrial Historic District. As such further evaluation of the Project's potential impacts to a historic resource will be provided in an EIR.

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.)

Potentially Significant Impact. The potential for cumulative impacts occurs when the impacts of the Project are combined with impacts from related development projects and result in impacts that are greater than the impacts of the Project alone. Located in the vicinity of the Project Site are other current and reasonably foreseeable projects, the development of which, in conjunction with the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative

basis will be addressed in the EIR for the following subject areas: air quality; cultural resources (historic); energy; geology and soils (paleontological resources); greenhouse gas emissions; land use and planning; noise; public services (police protection, fire protection); transportation; tribal cultural resources; and utilities (water supply, wastewater, and energy infrastructure).

- **Aesthetics**—Pursuant to Senate Bill 743 and ZI No. 2452, the Project is considered an employment center project on an infill site within a transit priority area, and thus in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment. Given the level of urbanization and transit in the vicinity of the Project Site, the majority of related projects would likewise be subject to SB 743 and could not combine with the Project to generate cumulative impacts under CEQA. Any related projects that are not subject to SB 743 would require appropriate analysis of potential impacts and mitigation, as necessary, to reduce such impacts to the extent feasible.

- **Agriculture, Forest, and Mineral Resources**—With regard to agriculture, forest resources, and mineral resources, no such resources are located on the Project Site or in the surrounding area. The Project would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts. As such, cumulative impacts to agriculture, forest resources, and mineral resources would be less than significant.

- **Air Quality (Odors)**—Due to the site-specific nature, impacts related to other emissions (such as those leading to odors) adversely affecting a substantial number of people are typically assessed on a project-by-project basis. As previously discussed, any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. With respect to Project operation, the Project would not involve the operation of uses typically associated with strong odors. In addition, on-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts. Impacts would be less than significant, and could not combine with other projects to result in cumulative impacts. As such, cumulative impacts would be less than significant.

- **Biological Resources**—As it relates to biological resources, the Project vicinity is highly urbanized, and similar to the Project, other developments occurring in the vicinity would occur on previously disturbed land. The Project Site does not contain any sensitive biological resources, and there are no native or protected trees located on-site or within the adjacent rights-of-way. Like the Project, related projects involving tree removals would be required to comply with the Migratory Bird Treaty Act, and vegetation removal would be limited such that it would not occur during the nesting season to ensure significant impacts to migratory birds do not occur. As such, the Project would not contribute to a cumulative effect associated with biological resources.

- **Cultural Resources**—With regard to impacts related to archaeological resources, as with the Project, each of the related projects is or would be subject to applicable regulations formulated to avoid significant archaeological resource impacts, including but not limited to CEQA mitigation and/or the City's standard COA for archaeological resources. Therefore, with adherence to applicable regulations, the Project and related projects would not result in significant cumulative impacts on archaeological resources.

  With regard to impacts related to human remains, if human remains were discovered during construction of any related projects, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code section 7050.5, and disposition of the human remains and any associated grave

goods would occur in accordance with PRC Section 5097.91 and 5097.98, as amended. Therefore, with the implementation of regulatory requirements, cumulative impacts related to human remains would be less than significant.

- **Geology and Soils**—Due to their site-specific nature, geology and soils impacts are typically assessed on a project-by-project basis or for a particular localized area. Therefore, as with the Project, related projects would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. Thus, impacts would not be cumulatively considerable and would be less that significant.

- **Hazards and Hazardous Materials**—Due to their site-specific nature, hazards and hazardous materials impacts are typically assessed on a project-by-project basis. Therefore, as with the Project, related projects would address site-specific hazards through the implementation of site-specific recommendations and/or mitigation measures. In addition, as with the Project, all related development located in the vicinity of the Project Site would be subject to local, regional, state, and federal regulations pertaining to hazards and hazardous materials. Therefore, with adherence to applicable regulations and implementation of site-specific recommendations and/or mitigation measures, cumulative impacts would be less than significant.

- **Hydrology and Water Quality**—Related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, as with the Project, the related projects would be subject to NPDES permit requirements for both construction and operation, including development of SWPPPs for construction projects greater than 1 acre and compliance with local requirements pertaining to hydrology and surface water quality. Related projects also would be evaluated on an individual basis by the City during both site plan review and CEQA review (if applicable) to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. Lastly, as indicated in Checklist Question No. X, Hydrology and Water Quality, of this Initial Study, the Project would result in less than significant hydrology and water quality impacts. As also indicated in Checklist Question No. X, the Project is not proposed in a floodplain, would not impede/redirect flood flows, and would not be subject to inundation by 100-year flood flows, seiches or tsunamis. Therefore, the Project would not contribute considerably to cumulative hydrology and water quality impacts, and cumulative hydrology and water quality impacts would be less than significant.

- **Land Use and Planning (Physically divide an established community)**—As discussed above, the Project would be implemented within the boundaries of the Project Site, and would not involve the closure of any surrounding streets that could impede access to surrounding properties. As such, Project-level impacts related to physically dividing an established community would be less than significant, and therefore could not combine with other projects in the vicinity of the Project Site to result in cumulative impacts. Cumulative impacts would be less than significant.

- **Population and Housing**—Not all related projects would include residential uses. As discussed in the analysis above, the Project does not propose residential uses and thus would not directly contribute to population growth. As part of the environmental review processes for the related projects, it is expected that mitigation measures would be established as necessary to address potential impacts related to population and housing. Thus, the Project impacts related to population and housing would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Public Services (Schools, Parks and Recreation, and Libraries)**—Similar to the Project, construction of related projects would generate part-time and full-time jobs associated with construction of the related projects between the start of construction and buildout. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, which require construction workers to commute to job sites that change many times in the course of a year, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. Therefore, like the Project, the construction employment generated by related projects would not result in a notable increase in the resident population or a corresponding demand for schools, parks, and libraries in the vicinity of the Project Site.

  With regard to operation, the Project would not generate a residential population that would directly increase the demand for schools, parks, and libraries, although the increase in commercial development could indirectly increase the demand for these services. Other related projects could also increase the demand for these services and facilities. However, in the case of schools, the applicants for most related projects would be required to pay school impact fees, which would offset any potential impact to schools associated with the related projects. Similarly, in the case of parks and recreational facilities (i.e., existing neighborhood and regional parks), projects with residential components would be required by the LAMC to include open space and pay park in-lieu fees (as required), which would help reduce the demand on neighborhood and regional parks, thereby reducing the likelihood that there would be substantial deterioration of parks. Employees generated by the non-residential related projects would be more likely to use parks and library facilities near their homes during non-work hours, as opposed to patronizing local facilities on their way to or from work or during their lunch hours. In addition, each related project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could be applied toward the provision of enhancing park facilities and library services in the City, as deemed appropriate. These revenues to the City's General Fund would help offset the increase in demand for park facilities and library services as a result of the Project and the related projects. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to schools, parks, and libraries. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Utilities and Service System—Solid Waste**—The Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction periods. However, as discussed above in Checklist Question No. XIX, unclassified landfills in the County do not generally have capacity concerns, and inert landfills serving the Project and the related projects would have sufficient capacity to accommodate construction waste disposal needs. With regard to operational solid waste disposal needs, the increase in solid waste generated by the Project would be well within the capacity of existing landfills, as discussed in Checklist Question No. XIX of this Initial Study. In addition, with the implementation of solid waste policies and objectives intended to help achieve the requirements of AB 939 and the City's 90 percent diversion goal, it is expected that the Project and related projects would not substantially reduce the projected timeline for landfills within the region to reach capacity. Furthermore, the County of Los Angeles conducts ongoing evaluations to ensure that landfill capacity is adequate to serve the forecasted disposal needs of the region. Therefore, the Project would not contribute considerably to cumulative solid waste impacts, and cumulative solid waste impacts would be less than significant.

- **Wildfire**—The Project Site is located in an urbanized area and there are no wildlands located in the vicinity of the Project Site. Therefore, the Project would not contribute to an increased wildfire risk. Moreover, the Project and related projects would be developed in accordance

with LAMC and LAFD requirements pertaining to fire safety. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to wildfires. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less that significant.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project could result in potentially significant impacts with regard to the following topics: air quality; energy; cultural resources (historic); geology and soils (paleontological resources); greenhouse gas emissions; land use and planning; noise; public services (police protection, fire protection); transportation; tribal cultural resources; and utilities (water supply, wastewater, and energy infrastructure). As a result, these potential effects will be analyzed further in the EIR.