

VI. Other CEQA Considerations

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1. Significant Unavoidable Impacts

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

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

As evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, and summarized below, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with respect to on-site and off-site noise sources during construction and on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance). Cumulative impacts associated with on-site and off-site noise during construction and off-site vibration during construction (pursuant to the significance threshold for human annoyance) would also be significant and unavoidable.

a. On-Site Construction Noise

The estimated on-site noise levels during all stages of Project construction would be below the significance threshold at receptor locations R4 and R5. However, the estimated on-site construction-related noise would exceed the significance criteria at receptor locations R1, R2, R3, R6, R6A, and R7. Implementation of Mitigation Measure NOI-MM-1 included in Section IV.G, Noise, of this Draft EIR, would reduce the Project's on-site construction noise levels to the extent feasible. Specifically, implementation of Mitigation Measure NOI-MM-1 (installation of temporary sound barrier) would reduce the noise generated by on site construction activities at the off-site sensitive uses, by a minimum of 11 dBA at receptor locations R1, R2, and R6A, 14 dBA at receptor location R3, 20 dBA at receptor location R6, and a minimum of 5 dBA at receptor location R7, which would reduce the noise impacts at receptor locations R1, R2, R3, and R7 to a less-than-significant level. However, the estimated construction-related noise levels would still exceed the significance thresholds at receptor location R6 with the implementation of Mitigation Measure NOI-MM-1 as temporary

noise barriers are typically limited to a 15-dBA noise reduction. There are no other feasible mitigation measures that could be implemented to further reduce the temporary noise impacts from on-site construction at receptor location R6. In addition, the temporary sound barriers would not be effective in reducing the construction-related noise levels for the upper levels of the future multi-story residential buildings located along the east and south sides of Project, represented by receptor locations R3, R6, and R6A. In order to be effective, the temporary noise barrier would need to be as high as the building, which would not be feasible (i.e., cost prohibitive and impractical). Therefore, construction noise impacts associated with on-site noise sources would be significant and unavoidable.

b. Off-Site Construction Noise

As indicated in Section IV.G, Noise, of this Draft EIR, noise levels due to off-site construction trucks, including during overlapping construction, would be below the significance thresholds and would not result in a significant impact. However, the estimated noise levels due to the off-site utility connections would exceed the significance criteria at the off-site receptor locations R1, R2, R3, and R6. Therefore, temporary noise impacts associated with construction of the Project's off-site utility connections would be significant.

Temporary noise barriers would be installed, as specified in Mitigation Measure NOI-MM-2 included in Section IV.G, Noise, of this Draft EIR. With implementation of Mitigation Measure NOI-MM-2, the estimated construction noise levels would be reduced to less than significant at receptor locations R1 and R6. However, noise impacts would remain significant at receptor locations R2 and R3. Therefore, construction noise impacts associated with the off-site utility connections would be significant and unavoidable.

c. On-Site Construction Vibration (Human Annoyance)

As discussed in Section IV.G, Noise, of this Draft EIR, the estimated ground-borne vibration levels from construction equipment would be below the significance criteria for human annoyance at off-site sensitive receptor locations R4, R5, R6A, and R7. The estimated ground-borne vibration would exceed the 72 VdB significance threshold, however, at receptor locations R1, R2, R3 and R6. As discussed in Section IV.G, Noise, of this Draft EIR, mitigation measures considered to reduce vibration impacts from on-site construction activities with respect to human annoyance included the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be very deep and long to be effective and are cost prohibitive for temporary applications, such as construction. In addition, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate ground-borne vibration from the excavation equipment. As such, there are no feasible mitigation measures to reduce the potential vibration human annoyance impacts, and the Project's vibration impacts from

on-site construction activities with respect to human annoyance would be significant and unavoidable.

d. Off-Site Construction Vibration (Human Annoyance)

As discussed in Section IV.G, Noise, of this Draft EIR, construction delivery/haul trucks would travel between the Project Site and the Santa Monica Freeway (I-10), via Alameda Street. Heavy-duty construction trucks would generate ground-borne vibration as they travel along the Project's anticipated haul route(s). There are future residential uses along Alameda Street between the Project Site and I-10 Freeway to the south. The future multi-family residential buildings are located approximately 20 feet from the truck travel path. As indicated in the noise calculation worksheets included in Appendix G of this Draft EIR, the temporary vibration levels could reach approximately 75 VdB periodically as trucks pass by the residences along Alameda Street, which would exceed the 72-VdB significance threshold for residential uses. Thus, potential vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from construction trucks traveling along the anticipated haul route(s) would be potentially significant. Mitigation measures considered to reduce vibration impacts from off-site construction activities with respect to human annoyance included the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate ground-borne vibration from the excavation equipment. In addition, it would not be feasible to install a wave barrier along the public roadways for the off-site construction vibration impacts. Therefore, the Project's vibration impacts from off-site construction activities with respect to human annoyance would be significant and unavoidable. In addition, to the extent that other related projects use the same haul route as the Project, the cumulative vibration impact with respect to human annoyance associated with temporary and intermittent vibration from haul trucks traveling along the designated haul route would also be significant and unavoidable.

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

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

As provided in Section II, Project Description, of this Draft EIR, the underlying purpose of the Project is to improve a series of underutilized parcels into a new production studio campus that would provide new television, video, and motion picture production facilities to retain production activities and jobs in Los Angeles while supporting the evolving needs of the entertainment industry for additional office space. This underlying purpose and associated objectives are closely tied to the goals and objectives set forth in the Central City North Community Plan, which in turn supports the objectives and policies of applicable larger-scale regional and local land use plans, including the City's Framework Element and the SCAG 2020–2045 RTP/SCS. The Project would support objectives and policies of the Framework Element. In particular, the Project would support the City's Goal 3A and associated Objective 3.1 to have a physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, and achievement of the vision for a more livable city by replacing existing underutilized storage and distribution facilities with a new production studio campus that would maximize the Project Site's productivity. The Project as a whole, as well as development of the proposed uses in an area with convenient access to public transit and opportunities for walking and biking, would promote an improved quality of life by facilitating a reduction of vehicle trips and vehicle miles traveled (Objective 3.2). The Project would promote the City's goals, objectives, and policies of the Framework Element's Urban Form and Neighborhood Design Chapter through proper design and effective use of the built environment to increase personal safety (Objective 5.9). Specifically, the Project would incorporate elements that promote individual and community safety, such as controlled access to all building elevators; proper lighting of building entries and walkways to provide for pedestrian orientation and clear identification of secure pedestrian travel routes between the parking areas and points of entry into the building; sufficient lighting of parking areas to maximize visibility and reduce areas of concealment; and design of entrances to and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites.

The Project would also meet the applicable objectives and policies that support the goals of the Central City North Community Plan. Specifically, the Project would support Objective 2-1 to provide additional opportunities for new commercial development and services by replacing the existing storage and distribution uses with a new production studio campus. The Project design and improvements would enhance the existing pedestrian activity and promote walkability 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, and wayfinding signage. In addition, each of the office buildings would front onto 6th Street and would include large lobbies at the ground level to enhance pedestrian activity along this street frontage while maintaining the unique security needs of a production studio campus. The Project would also support Goal 12 of the Community Plan to encourage alternative modes of transportation as the Project would be located in close proximity to various public transit options and to nearby commercial and residential uses.

The Project would also provide onsite bicycle parking spaces, lockers, and showers to promote alternative modes of transportation that would reduce vehicle trips. The Project would also support the goals of the 2020–2045 RTP/SCS. Specifically, the Project would improve mobility, accessibility, reliability, and travel safety, as well as protect the environment and health of the region’s residents by improving air quality and encouraging active transportation (e.g., bicycling and walking). The Project would be developed in an infill location within an existing urbanized area with an established network of roads and freeways that provides local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby mass transit options, including a number of bus lines. The Project would also provide bicycle parking spaces for the proposed uses that would serve to promote the use of bicycles. The Project would also provide charging stations to serve electric vehicles. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit, walking and biking, and thereby improve the environment and health of nearby residents by supporting low and zero emission modes of transportation.

Furthermore, as detailed in Section V, Alternatives, of this Draft EIR, other than the No Project/No Build Alternative, none of the alternatives would eliminate the Project’s significant and unavoidable impacts. However, the No Project/No Build Alternative would not achieve the Project’s underlying purpose to improve a series of underutilized parcels into a new production studio campus that would provide new television, video, and motion picture production facilities to retain production activities and jobs in Los Angeles while supporting the evolving needs of the entertainment industry for additional office space or the associated Project objectives. As discussed in detail in Section V, Alternatives, of this Draft EIR, the environmentally superior alternative, Alternative 3 (Increased Setback Alternative), would not eliminate the Project’s significant construction noise and vibration impacts. In addition, Alternative 3 would not fully meet the underlying purpose of the Project to improve a series of underutilized parcels into a new production studio campus.

Based on the above, the Project reflects a development that is consistent with the overall vision of the City for the Central City North Community Plan area, the City’s Framework Element; and SCAG’s 2020–2045 RTP/SCS. Additionally, the Project’s significant and unavoidable noise and vibration impacts would only occur during temporary and periodic construction activities, similar to those occurring at development sites in urban areas, particularly within infill locations. As such, the benefits of the Project, as outlined above, would outweigh the effects of the significant and unavoidable impacts of the Project. Furthermore, as detailed in Section V, Alternatives, of this Draft EIR, no feasible alternative was identified that would eliminate all of the Project’s significant and unavoidable impacts.

3. Significant Irreversible Environmental Changes

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

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

a. Building Materials and Solid Waste

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

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

b. Water

Consumption of water during construction and operation of the Project is addressed in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. As evaluated therein, given the temporary nature of construction activities, the short-term and intermittent water use during construction of the Project would be less than the net new water consumption estimated for the Project at buildout, and such water demand during construction would be offset by the removal of the existing uses on the Project Site. During operation, the estimated water demand for the Project would not exceed the available supplies projected by the City of Los Angeles Department of Water and Power (LADWP), as confirmed by the Water Supply Assessment prepared by LADWP for the Project and included as Appendix K of this Draft EIR. Thus, as evaluated in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, while Project construction and operation would result in some irreversible consumption of water, the Project would not result in a significant impact related to water supply.

c. Energy Consumption

During ongoing operation of the Project, non-renewable fossil fuels would represent the primary energy source, and, thus, the existing finite supplies of these resources would be incrementally reduced. Fossil fuels, such as diesel, gasoline, and oil, would also be consumed in the use of construction vehicles and equipment. Project consumption of non-renewable fossil fuels for energy use during construction and operation of the Project is addressed in Section IV.C, Energy, of this Draft EIR. As discussed therein, construction activities for the Project would not require the consumption of natural gas but would require the use of fossil fuels and electricity. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. In addition, trucks and equipment used during construction activities would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Further, on-road vehicles (i.e., haul trucks, worker vehicles) would be subject to federal fuel efficiency requirements. Therefore, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources. Thus, impacts related to the consumption of fossil fuels during construction of the Project would be less than significant.

During operation, the Project's increase in electricity and natural gas demand would be within the anticipated service capabilities of LADWP and the Southern California Gas Company (SoCalGas), respectively. In addition, as discussed in Section IV.C, Energy, of this Draft EIR, the Project would comply with energy conservation policies and plans relevant to the Project, including the California Title 24 energy standards, the City of Los Angeles Green Building Code, City of Los Angeles Green New Deal, and the 2020–2045 RTP/SCS.

Such requirements of the Title 24 and Green Building Code include specific lighting requirements to conserve energy, window glazing to reflect heat, enhanced insulation to reduce heating and ventilation energy usage, and enhanced air filtration. The Project would implement these measures as required by the applicable code. The 2022 Title 24 Standards ensure that builders use the most energy efficient and energy conserving technologies and construction practices. In addition, the Project would implement measures to comply with Title 24 energy efficiency requirements, including Project Design Feature GHG-PDF-1, as set forth in Section IV.C, Greenhouse Gas Emissions, of this Draft EIR.

Therefore, based on the above, the Project would not cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F of the CEQA Guidelines. In addition, Project operations would not conflict with adopted energy conservation plans. Refer to Section IV.C, Energy, of this Draft EIR, for further analysis regarding the Project's consumption of energy resources.

d. Environmental Hazards

The Project's potential use of hazardous materials is addressed in the Initial Study for the Project, included as Appendix A of this Draft EIR. As evaluated therein, during demolition, 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. During operation, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used in commercial developments. All potentially hazardous materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Therefore, any associated risk due to use or disposal of hazardous materials would be reduced to a less-than-significant level through compliance with these standards and regulations. As such, compliance with regulations and standards would serve to protect against significant and irreversible environmental changes that could result from the accidental release of hazardous materials.

e. Conclusion

Based on the above, Project construction and operation would require the irreversible commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources and the Project Site for future generations or for other uses. However, the consumption of such resources would not be considered substantial and would be consistent with regional and local growth forecasts and development goals for the area. The loss of such resources would not be highly accelerated when compared to existing conditions, and such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result from the Project, such changes are

concluded to be less than significant, and the limited use of nonrenewable resources that would be required by Project construction and operation is justified.

4. Growth-Inducing Impacts

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

a. Population

As discussed in Section II, Project Description, of this Draft EIR, the Project would include the construction of new studio, production support, office, and retail/restaurant uses. Since the Project does not propose a housing component, it would not directly induce a new residential population, which would contribute to population growth in the vicinity of the Project Site or the Central City North Community Plan area.

b. Employment

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

As discussed in the Initial Study, included as Appendix A of this Draft EIR, 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.¹ In 2026, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,947,972 employees.² Therefore, the projected employment growth in the City between 2020 and 2026 based on SCAG's 2020–2045 RTP/SCS is approximately 39,669 employees. The Project's estimated net new employees would constitute a nominal percentage of the employment growth forecasted between 2022 and 2026. Therefore, the Project would not cause an exceedance of SCAG's employment projections contained in the 2020–2045 RTP/SCS.

Overall, the provision of new jobs would constitute a small percentage of employment growth, would not be considered "unplanned growth," and would not produce such a high quantity of new jobs that it would have the possibility to induce unplanned residential growth. Therefore, the Project would not cause an exceedance of SCAG's employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities. As such, given that the Project would not directly contribute to substantial unplanned population growth in the Project area through the development of residential uses, and as some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site or who would commute, the potential growth associated with Project employees who may relocate their place of residence would not be substantial.

c. Utility Infrastructure Improvements

The area surrounding the Project Site is already developed with a mix of residential, commercial, and industrial uses, and the Project would not remove impediments to growth. The Project Site is located within an urban area that is currently served by existing utilities and infrastructure. While the Project would require local infrastructure to connect the Project Site to the mainlines, such improvements would be limited to serving Project-related demand and would not necessitate major local or regional utility infrastructure improvements that have not otherwise been accounted and planned for on a regional level.

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

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

d. Conclusion

Overall, the Project would be consistent with the growth forecast for the City of Los Angeles Subregion and would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of VMT. In addition, the Project would not require any major roadway improvements or open any large undeveloped areas for new use. Any access improvements would be limited to driveways necessary to provide immediate access to the Project Site and to improve safety and walkability. Therefore, direct and indirect growth-inducing impacts would be less than significant.

5. Potential Secondary Effects of Mitigation Measures

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

a. Geology and Soils (Paleontological Resources)

Mitigation Measures GEO-MM-1 through GEO-MM-4 are included in Section IV.D, Geology and Soils, of this Draft EIR to address potential Project impacts on paleontological resources. These mitigation measures require that a qualified paleontologist be retained prior to ground disturbance activities associated with the Project to develop Worker Environmental Awareness Program training to educate the construction crew as well as the procedures to follow in the event of a fossil discovery. Monitoring would occur during all ground disturbance activities at depths of 5 feet or greater within Pleistocene age older alluvial deposits, and if potential resources are found, ground disturbance activities may be temporarily halted as directed by the paleontologist. These mitigation measures could potentially require excavations to unearth additional paleontological resources, if recommended by the paleontologist. In addition, in the event that grading and excavation activities are temporarily diverted due to the discovery of a paleontological resource, construction activities could be delayed and the duration of construction could be extended. If the duration of construction is extended, the same construction activities evaluated throughout this Draft EIR would continue to occur. Extending the duration of construction would not result in new or increased activities not already evaluated in this Draft EIR. As such, extending the construction duration would not result in new or increased impacts

related to geology and soils, including paleontological resources. Therefore, implementation of Mitigation Measures GEO-MM-1 through GEO-MM-4 would be beneficial in reducing Project impacts on paleontological resources, if any, and would not result in significant adverse secondary impacts.

b. Noise

Mitigation Measures NOI-MM-1 and NOI-MM-2 require temporary and impermeable sound barriers to be installed during construction along the northern, eastern, southern, and western property lines of the Project Site as well as along Alameda Street, 6th Street, and Mill Street during implementation of off-site utility improvements. The installation of the sound barriers would include limited construction activities associated with installation. Any noise associated with this installation would not result in additional noise beyond what has already been disclosed in the discussion of construction impacts in Section IV.G, Noise, of this Draft EIR. Furthermore, the sound barriers would reduce the Project's noise impacts from construction, and upon completion of construction, the temporary sound barriers would be removed. As such, implementation of these mitigation measure would not result in adverse long term secondary impacts.

6. Effects Not Found to Be Significant

CEQA Guidelines Section 15128 states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the EIR. An Initial Study was prepared for the Project and is included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City of Los Angeles determined through the Initial Study that the Project would not have the potential to cause significant impacts related to aesthetics, agriculture and forestry resources; air quality (objectionable odors); biological resources; cultural resources (archaeological resources and human remains); geology and soils; hazards and hazardous materials; hydrology and water quality; land use and planning (physical division of an established community); mineral resources; noise (airport and airstrip noise); population and housing; transportation (hazardous design features); and solid waste. A summary of the analysis provided in Appendix A for these issue areas is provided below.

a. Aesthetics

As detailed in the Initial Study, Senate Bill (SB) 743 [Public Resources Code (PRC) Section 21099(d)] sets forth guidelines for evaluating project aesthetics and parking 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.”

Pursuant to PRC Section 21099, the Project is an employment center project that would be located on an infill site within a TPA. The Project is considered an employment center project because it is located on property that is zoned to permit commercial uses with a maximum FAR greater than 0.75. In addition, the Project Site is located on an infill site, as that term is defined in PRC Section 21099(a)(4), because the Project Site includes lots located within an urban area that has been previously developed. Lastly, the Project Site is located within a TPA, as that term is defined in PRC Section 21099(a)(7), because it is located within one-half mile of an existing “major transit stop.” In particular, the Project Site is located within one-half 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. Therefore, in accordance with PRC Section 21099(d)(1), the Project’s aesthetic impacts shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA. However, an analysis of the Project’s potential aesthetics impacts is included in the Initial Study for informational purposes only and not for determining whether the Project will result in significant impacts on the environment. Refer to the Initial Study prepared for the Project included in Appendix A of this Draft EIR for a detailed analysis of the Project’s potential aesthetics impacts.

b. Agriculture and Forestry Resources

The Project Site is located in an urbanized area of the City of Los Angeles and is developed with two single-story warehouse structures. The Project Site and surrounding area are not zoned for agricultural or forest uses, and no agricultural or forest lands occur onsite or in the vicinity of the Project Site. Therefore, as concluded in the Initial Study, no impacts to agriculture and forestry resources would occur.

c. Air Quality (Odors)

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

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

maintained in a manner that promotes odor control and, therefore, would not result in substantially adverse odor impacts.

In addition, the construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403 regarding visible emissions violations. In particular, SCAQMD Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material, which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. Therefore, with compliance with existing regulatory requirements, the Project would not create odors that would adversely affect a substantial number of people.

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

d. Biological Resources

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

As discussed above, landscaping within the Project Site is limited. There are six street trees located adjacent to the Project Site along Alameda Street. None of the off-site trees are considered to be protected under the City of Los Angeles Protected Tree and Shrubs Ordinance. To allow for development of the Project Site, the existing six street trees would

be removed. Pursuant to requirements of the City of Los Angeles Urban Forestry Division, the street trees are to be removed and replaced at a 2:1 basis.

The Project would comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish and Game Code Section 3503 states that “[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.” In accordance with the Migratory Bird Treaty Act and California Fish and Game Code, tree removal activities associated with the Project would take place outside of the nesting season (February 1–August 31), to the extent feasible. Should vegetation removal activities occur during the nesting season, a biological monitor would be present 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. With compliance with the Migratory Bird Treaty Act, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

For all the foregoing reasons, Project impacts to biological resources would be less than significant.

e. Cultural Resources (Archaeological Resources and Human Remains)

With regard to archaeological resources, the Project Site is located within an urbanized area of the City and has been subjected 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 Ground Penetrating Radar (GPR) Investigation (see Appendix IS-2 of the Initial Study included in Appendix A of this Draft EIR), no archeological resources were identified within the Project Site. Additionally, 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 disturbance of 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. In

addition, the Project would adhere to the City's condition of approval regarding the inadvertent discovery of archaeological resources. Therefore, as determined in the Initial Study and consistent with PRC 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.

With regard to human remains, the Project Site is located in an urbanized area and has been subject to previous grading and development. 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, and the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the 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 determines the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the most likely descendent. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. Therefore, 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.

f. Geology and Soils

The Project Site is not located within a City-designated Fault Rupture Study Area or an Alquist-Priolo Earthquake Fault Zone. As discussed in the Geotechnical Investigation, included as Appendix IS-3 of the Initial Study, 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. Therefore, as concluded in the Initial Study, since the potential for surface rupture due to faulting occurring beneath the Project Site is considered low, impacts would be less than significant.

In addition, the Project would be constructed in accordance with the most current Los Angeles Building Code, which incorporates current seismic design provisions of the California Building Code, with City amendment, 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. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of LADBS, including the recommendations provided in a final, site-specific geotechnical report subject to review and approval by LADBS. As such, as concluded in the Initial Study, impacts related to strong seismic ground shaking would be less than significant.

The Project Site is not located in an area that has been identified by the State or the City of Los Angeles as being potentially susceptible to liquefaction. In addition, as discussed in the Geotechnical Investigation included as Appendix IS-3 of the Initial Study, the historical high groundwater level at the Project Site is mapped at a depth of approximately 150 feet. As such, as concluded in the Initial Study, impacts associated with liquefaction would be less than significant.

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

Development of the Project would require grading, excavation, and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. This potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities during Project construction. Specifically, all grading activities would require grading permits from the City of Los Angeles Department of Building and Safety (LADBS), which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of LAMC Chapter IX, Article 1, which addresses grading, excavations, and fills. Furthermore, the Project would be required to comply with the City's LID ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. As concluded in the Initial Study, with compliance with regulatory requirements, impacts related to soil erosion or the loss of topsoil would be less than significant.

Regarding unstable geologic units, as indicated above, the Project would not be subject to or exacerbate liquefaction (including lateral spreading) or landslides. As previously

discussed, the mapped historic-high groundwater level beneath the Project Site is approximately 150 feet below ground surface. 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. Lastly, as discussed in the Geotechnical Investigation, soils underlying the Project Site include soils that are medium dense to very dense silty sands and sands. As such, due to the type and density of the soils underlying the Project Site, the Project Site soils would not be considered collapsible soils. Therefore, as concluded in the Initial Study, the Project would not cause a geologic unit or soil to become unstable. Impacts would be less than significant.

As discussed in the Geotechnical Investigation, as previously evaluated in a geotechnical evaluation conducted in 2015, the soils encountered has an expansion index of 6, which represents a very low expansion potential. Therefore, the Project would not create or import soils with a higher expansion potential, and impacts related to expansive soils would be less than significant.

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

g. Hazards and Hazardous Materials

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. Operation of the proposed uses 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. However, all potentially hazardous materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. The existing and previous land uses within the Project Site were identified as part of the Phase I ESA included as Append IS-4 of the Initial Study to assess their potential to present concerns relative to the presence of hazards and/or the handling of hazardous materials. 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.

According to the Phase I ESA, two USTs were previously located on the Project Site, including one 10,000-gallon diesel UST and one 10,000-gallon gasoline USTs. 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. With regard to operation, the Project does not propose the installation of underground or aboveground storage tanks. 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, and impacts related to USTs and ASTs would be less than significant.

Based on an asbestos survey previously conducted in 1989 for the Project Site (see Appendix IS-5 of the Initial Study), 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. As discussed in the Initial Study, since the remaining materials were observed in good condition, no further action was recommended. 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. With compliance with relevant regulations and requirements regarding asbestos-containing materials, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment. With regard to operation, development of the Project would include the use of commercially-sold materials that would not include asbestos or asbestos containing materials (ACMs). Project operation is, therefore, not anticipated to increase the occurrence of friable asbestos or ACMs at the Project Site. 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 ACMs would be less than significant.

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. including standard handling and disposal practices pursuant to OSHA regulations. Therefore, with compliance with relevant regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of LBP into the environment. With regard to operation, 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. 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 LBP would be less than significant.

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. In the event that PCBs are found within areas proposed for demolition, suspect materials would be removed in accordance with all applicable federal, State, and local regulations.. With regard to operation, 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 impacts related to PCBs would be less than significant.

As discussed in 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 (see Appendix IS-5 of the Initial Study), 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. With regard to operation, the Project does not include the installation of oil wells. In addition, as discussed in the Methane Report, 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. As such, there is a negligible risk of subsurface methane release. 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. Impacts associated with oil wells and methane gas would be less than significant.

Based on the above, with compliance with regulatory requirements, the Project would not result in a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment. Thus, as concluded in the Initial Study, impacts related to the release of hazardous materials into the environment would be less than significant.

The nearest school is Para Los Niños Elementary School, which is located approximately 0.18 miles south of the Project Site. However, 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. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturer's 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. Therefore, with compliance with relevant regulations and requirements, the Project would not create a significant hazard to nearby schools, and impacts would be less than significant.

As discussed in the Phase I ESA, the Project Site 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. 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, 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 HAZNET 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 the identification of the Project Site on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would be less than significant.

The Project Site is not located within 2 miles of an airport or a private airstrip or located within an airport planning area and would not result in a safety hazard for people residing or working in the area.

While it is expected that the majority of construction activities for the Project would be confined to the Project Site, off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would remain open such that at least one travel lane in each direction would be available. 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 vicinity of the Project Site. Thus, as concluded in the Initial Study, impacts related to implementation of the City's Emergency Response Plan would be less than significant.

As discussed in the Initial Study, there are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or within a City-designated fire buffer zone. Furthermore, the Project would

be developed in accordance with LAMC requirements pertaining to fire safety. 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. Therefore, as concluded in the Initial Study, no impacts would occur.

h. Hydrology and Water Quality

Construction activities such as earth moving, maintenance of construction equipment, handling of construction materials, and dewatering can contribute to pollutant loading in stormwater runoff. In addition, 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 National Pollutant Discharge Elimination System (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. 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. Therefore, as concluded in the Initial Study, impacts to surface water quality during construction of the Project would be less than significant.

During operation, anticipated 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, evapotranspired, 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 the Project Site currently discharges without any means of treatment, implementation of LID BMPs as part of the Project would improve existing site conditions. Therefore, with the implementation of LID BMPs, 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.

As discussed in the Hydrology and Water Resources Technical Report, included as Appendix IS-6 of the Initial Study, 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. 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 that 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. In addition, 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, impacts to groundwater quality during operation of the Project would be less than significant.

Operational activities which would affect groundwater quality include hazardous material spills and leaking underground storage tanks. As previously discussed, 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, and impacts on groundwater quality during operation would be less than significant.

With regard to groundwater recharge, under existing conditions, 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. Therefore, as concluded in the Initial Study, the Project would not interfere substantially with groundwater recharge such that groundwater management would be impeded, and impacts would be less than significant.

Construction activities associated with the Project have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. However, as discussed above, 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. Therefore, the Initial Study concluded impacts would be less than significant.

The Project Site is not located within a 100-year flood plain as mapped by the Federal Emergency Management Agency (FEMA) or by the City. However, the Project Site is located within a potential inundation area as mapped by the City of Los Angeles General Plan Safety Element and the nearest levee is along the Los Angeles River located approximately 0.4 mile east of the Project Site. Although the Project Site is mapped within an inundation zone, 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 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.

Furthermore, 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. Therefore, the Initial Study concluded that impacts would be less than significant.

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

The area surrounding the Project Site is developed primarily with a mix of low to mid rise buildings containing a variety of industrial, commercial, and residential uses, which vary widely in building style and period of construction. 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 an LA Metro bus storage facility to the west. The Project would remove and replace the existing two single-story warehouse structures on the Project Site with a new production studio campus. These uses would be consistent with the mix of land uses located adjacent to and in the general vicinity of the Project Site. All proposed development would also 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. Project impacts related to the physical division of an established community would be less than significant.

j. Mineral Resources

No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone, where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey. The Project Site is also not located within a City-designated oil field or oil drilling area. Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. Therefore, as concluded in the Initial Study, no impacts related to mineral resources would occur.

k. Noise (Airport and Airstrip)

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. Therefore, given the distance between the Project Site and the nearest airport, the Project would not expose people working in the Project area to excessive noise levels from airports or airstrips, and no impacts would occur.

l. Population and Housing

The Project would include the construction of a new production studio campus. Since the Project does not propose a housing component, it would not directly induce a new

residential population, which would contribute to population growth in the vicinity of the Project Site or the Central City North Community Plan area. The Project would have the potential to generate indirect population growth in the vicinity of the Project Site as a result of the employment opportunities generated by the Project.

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. In 2026, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,947,972 employees. 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. The Project's estimated net new employees would constitute a nominal percentage of the employment growth forecasted between 2022 and 2026. Therefore, the Project would not cause an exceedance of SCAG's employment projections contained in the 2020–2045 RTP/SCS.

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. Therefore, as concluded in the Initial Study, the Project would not induce substantial population growth either directly or indirectly, and impacts would be less than significant.

The Project Site is currently occupied by two single-story warehouse structures. As no housing currently exists on the Project Site, the Project would not displace any existing people or housing. Therefore, as concluded in the Initial Study, the Project would not create any impacts related to displacement of people or housing.

m. Public Services

(1) Schools

The Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of students within the service area of LAUSD from the introduction of a residential population. In addition, the number of students that may be indirectly generated by the Project that could attend LAUSD schools serving the Project Site would not be anticipated to be substantial because not all employees of the Project are likely to reside in the vicinity of the Project Site. Furthermore, pursuant to 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. Therefore, as concluded in the Initial Study, the Project would not result in the need for new or altered park facilities or substantially increase the demand for parks, and impacts would be less than significant.

(2) Parks

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create a demand for parks. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks. In addition, Project employees would be more likely to use parks near their homes during non-work hours. Furthermore, the Project 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, and wayfinding signage. Along Alameda Street and Mill Street, proposed landscaped areas would add to the available public open space. In addition, the Project would include a landscaped amenity deck at the second level of each office building, which would provide ample open space for use by employees. Landscaped roof decks within each of the two 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. Therefore, as concluded in the Initial Study, the Project would not result in the need for new or physically altered parks, and impacts would be less than significant.

(3) Libraries

The Project area is served by existing Los Angeles Public Library (LAPL) facilities within the Central City and Central City North Community Plan areas, including the Los Angeles Central Library and the Little Tokyo branch library. 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 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 services. Therefore, as concluded in the Initial Study, impacts would be less than significant.

n. Recreation

As discussed above, the Project does not propose the development of residential uses which would create a demand on nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, at least in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create a demand for parks and recreational facilities, and such use is anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site parks and recreational facilities. The Project would also provide on-site open space. In addition, Project employees would be more likely to use parks near their homes during non-work hours. Therefore, as concluded in the Initial Study, impacts on parks and recreational facilities would be less than significant.

o. Transportation (Geometric Design Features)

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 uses would be consistent with the surrounding uses (i.e. residential and commercial) and would not introduce hazards due to incompatible uses. Furthermore, 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. Therefore, as concluded in the Initial Study, impacts would be less than significant.

p. Utilities and Service Systems—Solid Waste

Pursuant to the requirements of Senate Bill (SB) 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. 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. 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, are disposed of in inert waste landfills. The County's inert landfill is the Azusa Land Reclamation landfill, which has a remaining capacity of 64.64 million tons. The amount of construction and generation waste generated under the Project would represent a nominal percentage of the Azusa Land Reclamation Landfill's remaining disposal capacity of 64.64 million tons. As such, the Azusa Land Reclamation landfill, the County's inert waste landfill, would be able to accommodate waste from the Project's construction activities.

During operation, Project-generated solid waste would be collected by a private waste hauler and taken for disposal at one of the County's Class III landfills open to the City of Los Angeles. The estimated remaining capacity for the County's Class III landfills open to the City of Los Angeles is approximately 132.58 million tons. The Project's estimated solid waste generation would represent a nominal percentage of the remaining daily disposal capacity of those landfills. Therefore, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste that would be generated by the construction and operation of the Project, and impacts would be less than significant. Additionally, 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. The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. As concluded in the Initial Study, since the Project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste, impacts would be less than significant.

q. Wildfire

The Project Site is located in an urbanized 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 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 concluded in the Initial Study, no impacts related to the following would occur: (1) the impairment of an adopted emergency response plan or emergency evaluation plan related to wildfire; (2) the exposure of Project occupants to pollutant concentrations from a wildfire; (3) the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or (4) the exposure of people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage.