



Romaine and Sycamore Project

Case Number: ENV-2022-3634-EIR

Project Location: 7000 W. Romaine Street, 930–956 N. Sycamore Avenue, and 931–953 N. Orange Drive, Los Angeles, California 90038

Community Plan Area: Hollywood

Council District: 13—Soto-Martinez

Project Description: The Project proposes a new commercial development on an 89,396-square-foot (2.05-acre) Project Site located in the Hollywood Community Plan Area of the City of Los Angeles (the Project). The Project would include 200,990 square feet of new commercial development, comprised of 194,597 square feet of office uses (including 5,200 square feet of amenities open only to employees) and 6,393 square feet of ground floor retail and/or restaurant uses, in a new 14-story, 196-foot tall (216 feet to the top of the elevator penthouse) building. The existing 66,904-square-foot historic Howard Hughes Headquarters Building would be retained on-site with no alterations or change in use, while three existing buildings comprising 3,535 square feet and a surface parking lot would be removed to accommodate the new building. Upon completion, 267,894 square feet of floor area would be located within the Project Site, including the existing floor area to remain, resulting in a maximum floor area ratio (FAR) of 3:1. The Project would provide approximately 809 vehicular parking spaces and 64 bicycle parking spaces within five above ground levels and four subterranean parking levels. Construction of the Project would require an estimated maximum depth of excavation of up to 73 feet, resulting in the export of approximately 149,946 cubic yards of soil.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

Eyestone Environmental, LLC

APPLICANT:

ONNI 7000 Romaine LLC

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1 INTRODUCTION

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

This Initial Study (IS) evaluates the potential environmental effects that could result from the construction, implementation, and operation of the Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code Section 21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations Section 15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document. Based on the analysis provided within this Initial Study, the City has concluded the Project may result in significant impacts on the environment, and the preparation of an Environmental Impact Report (EIR) is required. This Initial Study and the forthcoming EIR are intended as informational documents, which are ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE OF AN INITIAL STUDY

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

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration or Mitigated Negative Declaration is appropriate, an EIR is normally required.¹

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

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1. INTRODUCTION

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

2. EXECUTIVE SUMMARY

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

3. PROJECT DESCRIPTION

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

4. EVALUATION OF ENVIRONMENTAL IMPACTS

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

1.3 CEQA PROCESS

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

1.3.1 Initial Study

At the onset of the environmental review process, the City has prepared this Initial Study to determine if the Project may have a significant effect on the environment. This Initial Study has determined that the Project may have a significant effect(s) on the environment and an EIR will be prepared.

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

1.3.2 Draft EIR

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

1.3.3 Final EIR

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

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

2 EXECUTIVE SUMMARY

PROJECT TITLE	Romaine and Sycamore Project
ENVIRONMENTAL CASE NO.	ENV-2022-3634-EIR
RELATED CASES	CPC-2022-3633-VZC-HD-CU-CUB-SPR; VTT-83821-CN

PROJECT LOCATION	7000 W. Romaine Street, 930–956 N. Sycamore Avenue, 931–953 N. Orange Drive
COMMUNITY PLAN AREA	Hollywood
GENERAL PLAN DESIGNATION	Limited Manufacturing
ZONING	MR1-1
COUNCIL DISTRICT	13—Soto-Martinez

LEAD CITY AGENCY	City of Los Angeles
CITY DEPARTMENT	Department of City Planning
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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

- | | | |
|---|--|--|
| <input type="checkbox"/> Aesthetics | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Air Quality | <input type="checkbox"/> Hydrology/Water Quality | <input checked="" type="checkbox"/> Transportation |
| <input type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Land Use/Planning | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Utilities/Service Systems |
| <input checked="" type="checkbox"/> Energy | <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input checked="" type="checkbox"/> Geology/Soils | <input type="checkbox"/> Population/Housing | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Erin Strelch, City Planning Associate

PRINTED NAME, TITLE

June 9, 2023

DATE

EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a Lead Agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the Lead Agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of a mitigation measure has reduced an effect from “Potentially Significant Impact” to “Less Than Significant Impact.” The Lead Agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Project proposes a new commercial development on an 89,396-square-foot (2.05 acre) Project Site located in the Hollywood Community Plan Area of the City of Los Angeles (the Project). The Project would include 200,990 square feet of new commercial development comprised of 194,597 square feet of office uses (including 5,200 square feet of amenities open only to employees) and 6,393 square feet of retail and/or restaurant uses. These uses would be located in a new 14-story, 196-foot tall (216 feet to the top of the elevator penthouse) building comprised of one lobby/retail level, and eight levels of office uses above five levels of aboveground parking and four levels of subterranean parking. The existing 66,904-square-foot historic Howard Hughes Headquarters Building would be retained on-site with no alterations or change in use. Three buildings, comprising 3,535 square feet, and an existing surface parking lot would be removed. Upon completion, 267,894 square feet of floor area would be located within the Project Site, including the existing floor area to remain, resulting in a maximum floor area ratio (FAR) of 3:1. The Project would also provide approximately 809 vehicular parking spaces and 64 bicycle parking spaces within four subterranean parking levels and five above-ground levels. Construction of the Project would require an estimated maximum depth of excavation of up to 73 feet below grade, resulting in the export of approximately 149,946 cubic yards of soil.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The 89,396 square foot (2.05-acre) Project Site is located at 7000 W. Romaine Street, 930–956 N. Sycamore Avenue., and 931–953 N. Orange Drive in the Hollywood Community Plan (Community Plan) area of the City of Los Angeles (City). As shown in Figure 1 on page 8, the Project Site is bounded by W. Romaine Street to the north; existing office and commercial development (i.e., Jeffrey Deitch Art Gallery, Ex Nihilo Salon, Pause West Hollywood Wellness Center, etc.) to the south; N. Orange Drive to the east; and N. Sycamore Avenue to the west. Regional access to the Project Site is provided by N. La Brea Avenue, Santa Monica Boulevard and Melrose Avenue, located approximately 0.07, 0.13, and 0.31 miles from the Project Site, respectively, and the Hollywood Freeway (US-101) located approximately two miles east of the Project Site. Local access to the Project Site is provided by W. Romaine Street, N. Sycamore Drive, and N. Orange Drive.

3.2.2 Existing Conditions

As shown in Figure 2 on page 9, the 940 Sycamore parcel is currently developed with three buildings totaling 3,535 square feet along with a surface parking lot, while the 7000 Romaine parcel is currently developed with the 66,904 square-foot historic Howard Hughes Headquarters Building which accommodates several office and commercial uses including, but not limited to, the Producers Film Center, Pacific Psychotherapy, and the offices of the Hollywood Media District. Vehicular access to the 940 Sycamore parcel is currently provided by a loading driveway off of N. Sycamore Avenue, while vehicular access to the 7000 Romaine parcel is currently limited to a two-way driveway and one loading driveway along N. Orange Drive. Pedestrian access to the 940 Sycamore parcel is currently provided by the aforementioned vehicular access off of N. Sycamore Avenue and from the Howard

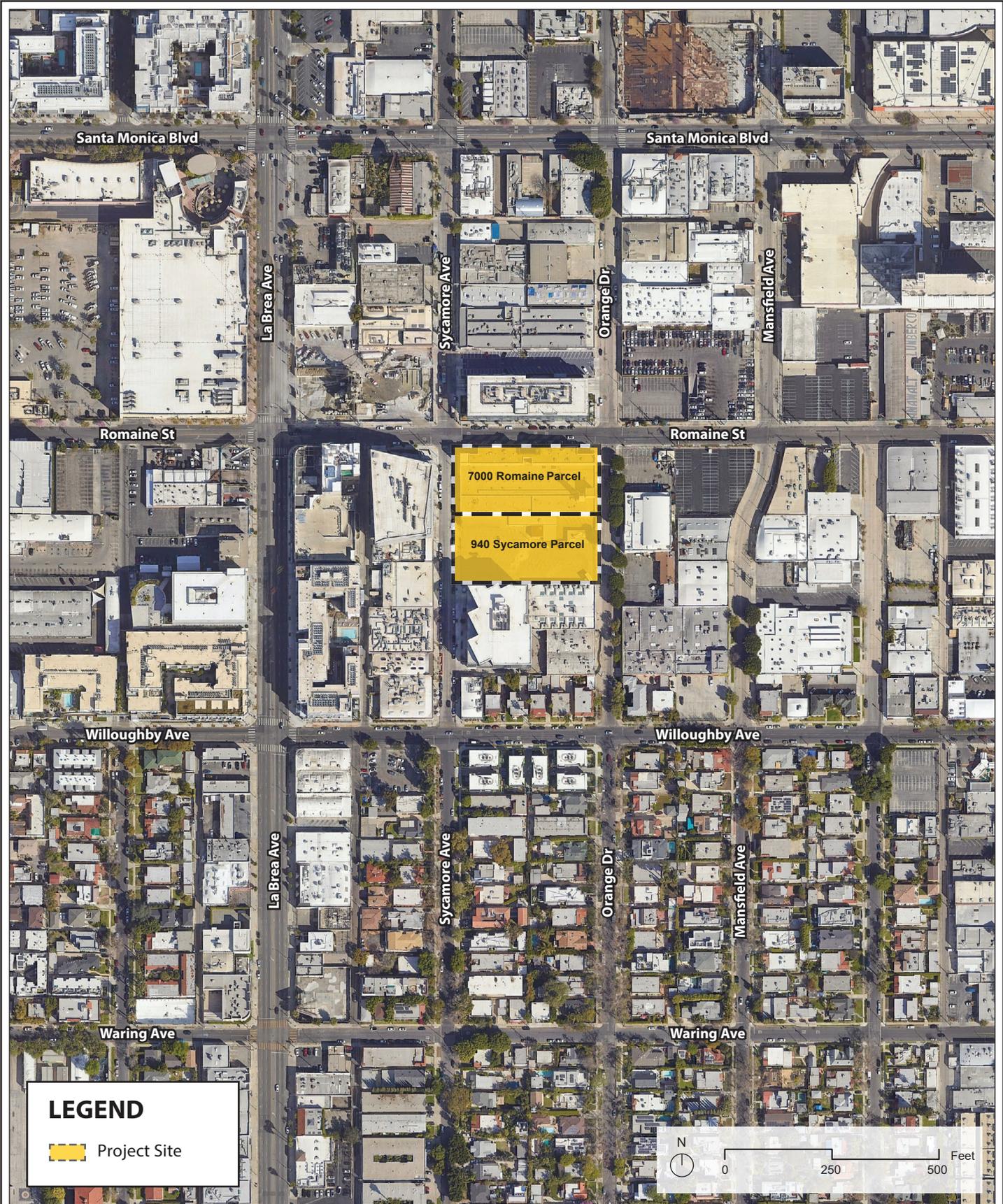


Figure 2
Aerial Photo of the Project Site and Vicinity

Source: Google Maps, 2023; Eyestone Environmental, 2023.

Hughes Headquarters Building, while pedestrian access to the 7000 Romaine parcel is currently provided by several building entrances off of Romaine Street. Existing landscaping on the 940 Sycamore parcel is limited to two trees in the eastern portion, an island with shrubs in the parking lot, and several shrubs in the northwest corner along N. Sycamore Avenue, while existing landscaping on the 7000 Romaine parcel is limited to several shrubs and other landscaping within an approximately 25 foot by 20 foot alcove and pedestrian entry along the Howard Hughes Headquarters Building's Romaine Street frontage. There are sidewalks but no street trees along the Project Site's N. Sycamore Avenue, N. Orange Drive, and W. Romaine Street frontages.

As noted previously, the Project Site is located within the planning boundary of the Hollywood Community Plan.² The Project Site has a General Plan land use designation of Limited Manufacturing and is zoned MR1-1 (Restricted Industrial, Height District 1).³ Pursuant to the Los Angeles Municipal Code (LAMC), the MR1-1 Zone permits CM uses (i.e., wholesale, storage, clinics, limited manufacturing, limited C2 uses, and R3 uses), and limited commercial and manufacturing, clinic, media products, limited machine shop, and hospital and kennel uses.⁴ Height District 1 in conjunction with the MR1 Zone has no height limit and a maximum FAR of 1.5:1.⁵ The Project Site is also located within the boundaries of the Los Angeles State Enterprise Zone and is located within a City-designated Transit Priority Area (TPA).⁶ Lastly, the Howard Hughes Headquarters Building on the 7000 Romaine parcel has special designation in the National Historic Register and SurveyLA, and is a City-designated Historic Cultural Monument (HCM) No. 1238.^{7,8}

The Project Site is located within a City-designated TPA⁹ and is well served by a variety of public transit options provided by the Los Angeles County Metropolitan Transit Authority (Metro) and the Los Angeles Department of Transportation (LADOT). Specifically, transit options in the vicinity of the Project Site include: the Hollywood/Highland station of the Metro B Line (located approximately 0.91 mile northeast of the Project Site); Metro bus lines 4, 212, and 224; LADOT's DASH Hollywood Line

² On May 3, 2023, the City Council adopted an update to the Hollywood Community Plan (Plan). The City Council also recommended an amendment requested in the motion from Council District 13 (Soto-Martinez) and a follow up report requested in the motion from Council District 4 (Raman). Information on the adopted Plan, amendment, and reports is available at <https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update#about>. The City Attorney will review and finalize the implementing ordinances to ensure clarity of regulations and consistency with state law, which can take approximately six months to a year. After this process is complete, the updated Plan will be brought into effect by the City Council.

³ City of Los Angeles, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for 948 N. Sycamore Avenue, 931 N. Orange Drive, and 7000 W. Romaine Street, June 2, 2022.

⁴ City of Los Angeles—Department of City Planning, Generalized Summary of Zoning Regulations, Table 1, Generalized Development Standards, updated March 2020.

⁵ City of Los Angeles—Department of City Planning, Generalized Summary of Zoning Regulations, Table 2, Height Districts, updated March 2020.

⁶ City of Los Angeles, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for 948 N. Sycamore Avenue, 931 N. Orange Drive, and 7000 W. Romaine Street, June 2, 2022.

⁷ City of Los Angeles, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 7000 W. Romaine Street, June 2, 2022.

⁸ City of Los Angeles, SurveyLA Report for 7000 W. Romaine St. (Howard Hughes Headquarters Building), November 23, 2015.

⁹ City of Los Angeles, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for 948 N. Sycamore Avenue, 931 N. Orange Drive, and 7000 W. Romaine Street, June 2, 2022.

(located approximately 0.4 miles north of the Project Site); and Antelope Valley Transit Authority bus line 786. Each of these bus lines have stops within 0.25 miles of the Project Site.

3.2.3 Surrounding Land Uses

The Project Site is located in a highly urbanized area developed with a mix of commercial, industrial, manufacturing, residential and parking uses. Land uses located adjacent to the Project Site include: office, commercial, and parking structure uses to the north (across Romaine Street); office and commercial uses immediately adjacent to the Project Site to the south; digital media, light manufacturing, and surface parking uses to the east (across N. Orange Drive); and office, commercial, and parking structure uses to the west (across N. Sycamore Avenue). The parcels immediately surrounding the Project Site all have a Limited Manufacturing General Plan land use designation, and all these parcels are zoned MR1-1 (Restricted Industrial, Height District 1).¹⁰

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

As discussed above and shown in Table 1 on page 12, the Project proposes a new commercial development on an 89,396-square-foot (2.05-acre) Project Site located in the Hollywood Community Plan Area of the City of Los Angeles. The Project would include 200,990 square feet of new commercial development comprised of 194,597 square feet of office uses (including 5,200 square feet of amenities open only to employees) and 6,393 square feet of retail uses. These uses would be located in a new 14-story, 196-foot tall (216 feet to the top of the elevator penthouse) building comprised of one lobby/retail level, and eight levels of office uses above five levels of above ground parking, and four levels of subterranean parking. The existing 66,904-square-foot historic Howard Hughes Headquarters Building would be retained on-site with no alterations or change in use. Three buildings, comprising 3,535 square feet, and a surface parking lot would be removed. Upon completion, 267,894 square feet of floor area would be located within the Project Site, including the existing floor area to remain, resulting in a maximum FAR of 3:1. A total of 92 existing parking spaces will be removed to accommodate the Project. The Project would provide approximately 809 vehicular parking spaces, which includes parking for the existing uses to remain, and 64 bicycle parking spaces within five above-ground and four subterranean parking levels. Construction of the Project would require an estimated maximum depth of excavation of up to 73 feet below grade, resulting in the export of approximately 149,946 cubic yards of soil.

3.3.2 Design and Architecture

The Project is a 14-story commercial building designed to take cues in terms of materials and scale from the Howard Hughes Headquarters Building on the northern portion of the Project Site. The parapet line of the historic building is mimicked by the ground floor retail and lobby space heights on the new façade, providing continuity at street level, and the simple, light-colored volumes of the historic building are re-interpreted by the architect as stone-clad masses of similar scale within the

¹⁰ City of Los Angeles, Zone Information and Map Access System (ZIMAS), Zoning Map and General Plan land use map for 7000 W. Romaine Street, June 9, 2022.

**Table 1
Summary of Proposed Floor Area^a**

Land Use	Existing Development	Proposed New Development	Existing Uses to Remain	Floor Area Upon Completion
Office	69,822 sf	194,597 sf	66,904 sf	261,501 sf
Retail/Restaurant	0 sf	6,393 sf	0 sf	6,393 sf
Storage	617 sf	0 sf	0 sf	0 sf
Total	70,439 sf	200,990 sf	66,904 sf	267,894 sf
<p><i>sf = square feet</i> <i>du = dwelling units</i></p> <p>^a <i>Square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as “[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas.”</i></p> <p><i>Source: Eyestone Environmental, 2023.</i></p>				

base of the Project, which are used to transition the scale and architecture between the two, while still providing continuity. The hand-set tiles at the front doors of the historic building serve as inspiration for the use of ceramics on a larger scale, but in a simplified way as color accents at the new building’s street entrances.

The glass-clad office floors provide views of the Hollywood Hills to the North and the downtown skyline to the South and East. The office mass is set back from the parking podium to create a tenant terrace on the seventh level which connects to a fitness center. The building’s massing references the new architecture of the area with its large podium base, while the recessed, zig zag design of the upper office floors create a distinct image of the building within the developing urban context. The building’s facades, particularly to the south and west, are tuned to the environment and utilize frit, a micro-thin compound of silica-based materials permanently bonded to the glass surface, to mitigate solar gain through the building.

Building elevations are shown in Figure 3 through Figure 6 on pages 13 through 16, a first floor plan is shown on Figure 7 on page 17, and a conceptual rendering is shown on Figure 8 on page 18.

3.3.3 Amenities and Landscaping

Although the LAMC does not require office and commercial developments to include open space, the Project would provide indoor and outdoor amenities and landscaping. Specifically, the Project would include a 4,000 square-foot fitness center on Level 7, along with a landscaped outdoor terrace that would include a meeting space, seating areas, outdoor fitness areas, and a perimeter pathway. The Project would also include a 1,200 square-foot tenant lounge on Level 14, along with a landscaped outdoor terrace that would include lounge areas, game areas, seating, and a perimeter pathway. The amenity areas would be for use by the Project’s employees. In addition to the above, two new street

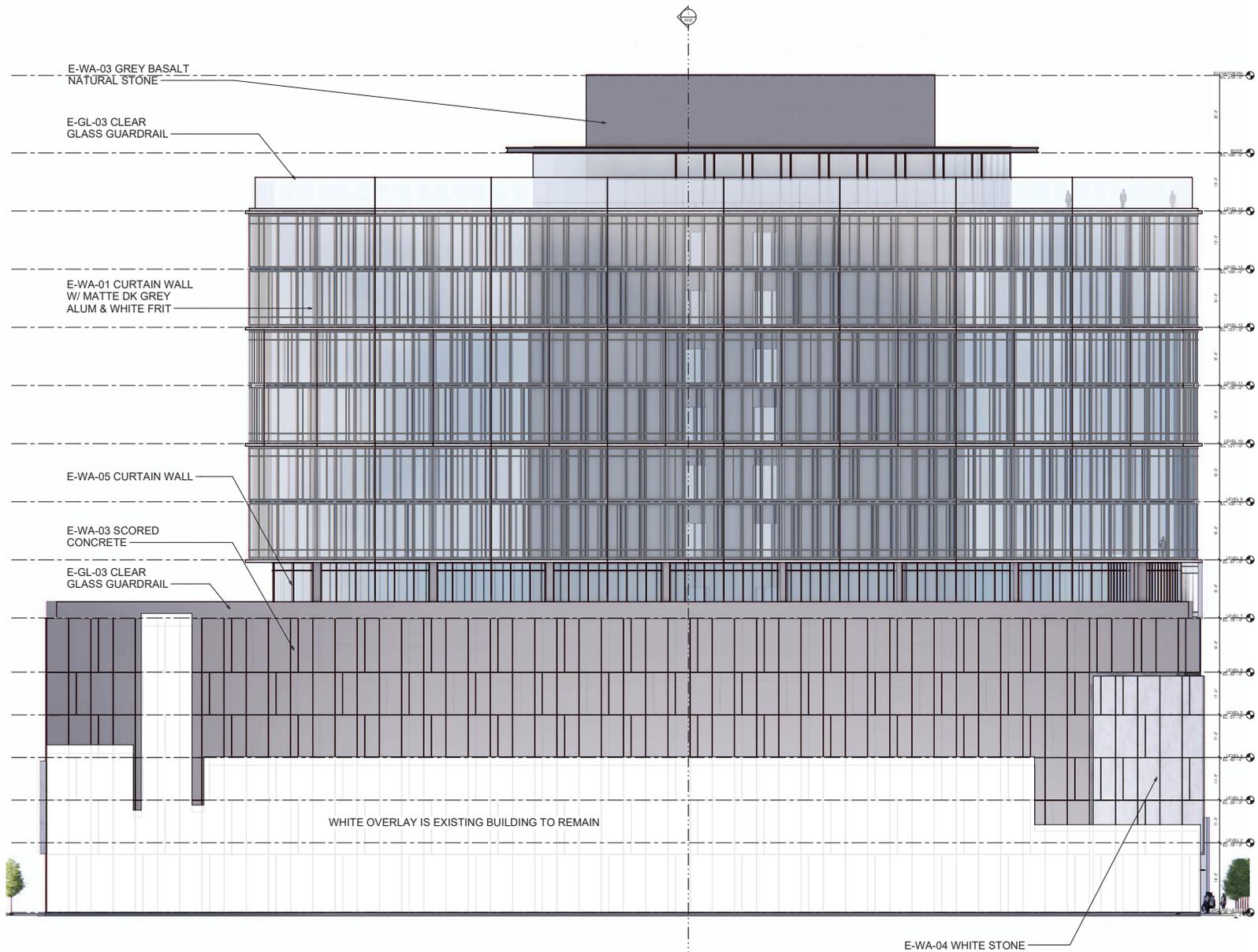


Figure 3
 Building Elevation North

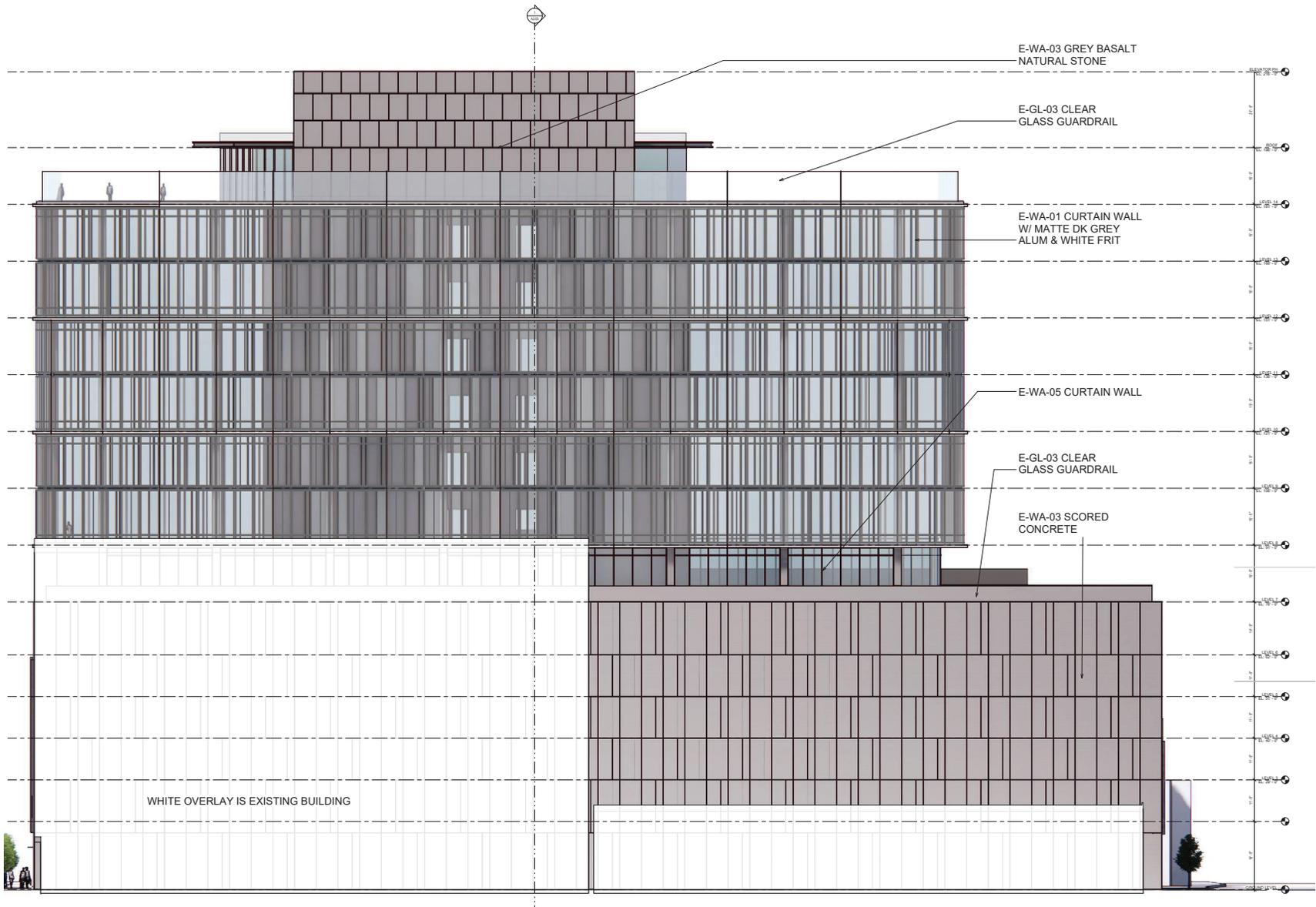


Figure 4
Building Elevation South

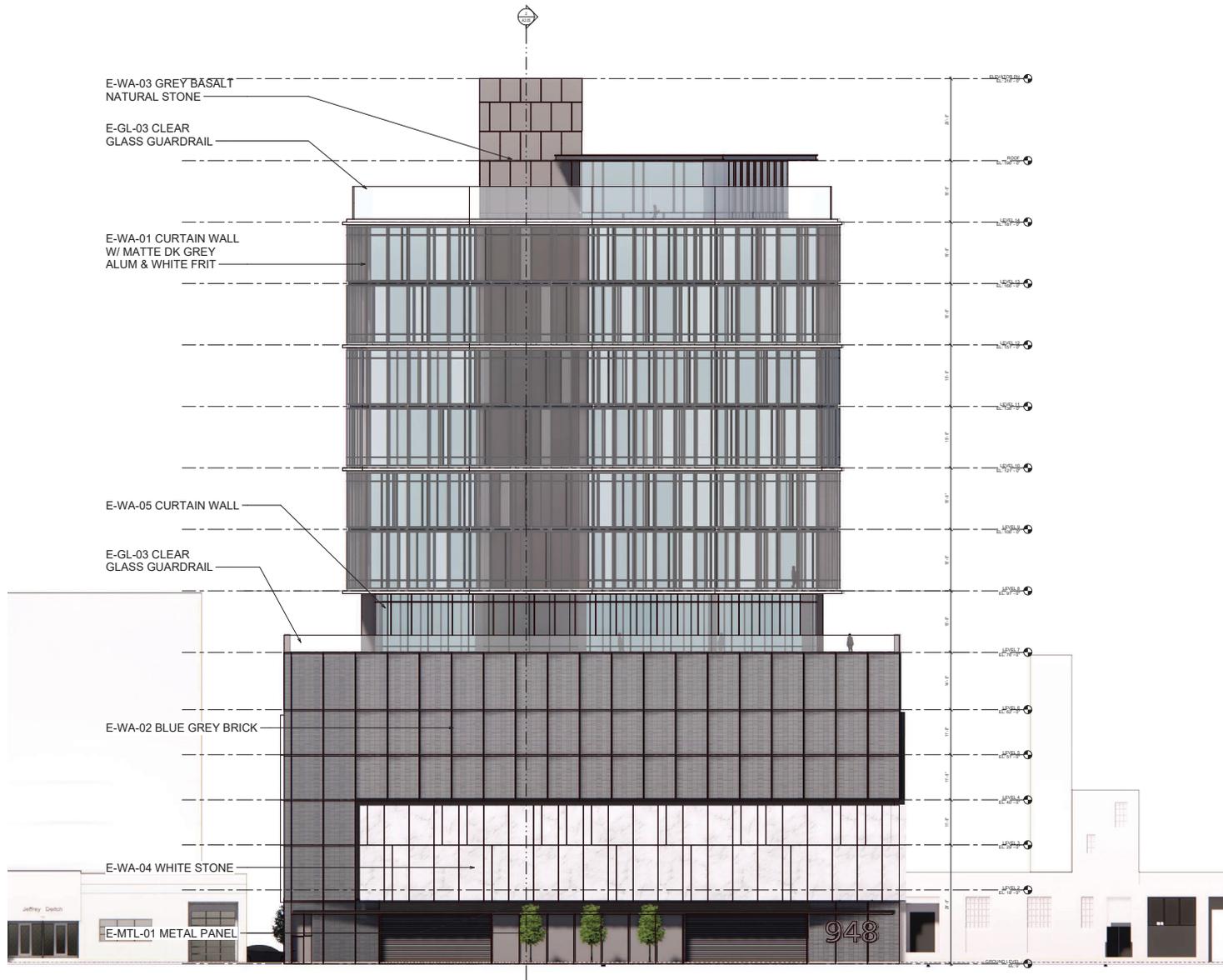


Figure 5
 Building Elevation East

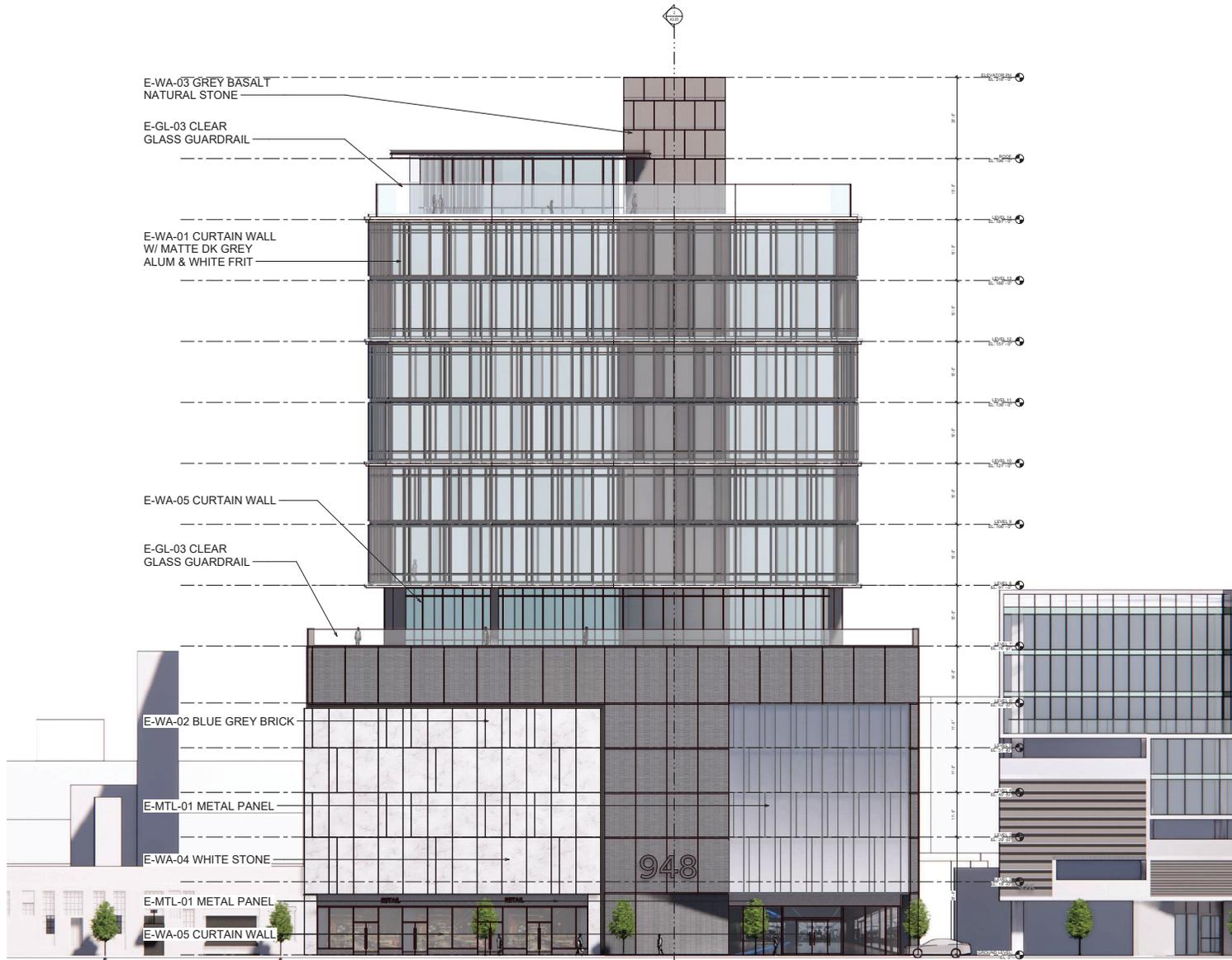


Figure 6
Building Elevation West

EXISTING TO REMAIN
7000 ROMAINE ST, LOS ANGELES



Figure 7
Floor Plan – Ground Floor
(940 Sycamore Parcel)



Figure 8
Conceptual Rendering

trees would be planted and several parkway planters would be installed at the ground level along the 940 Sycamore parcel's N. Sycamore Street frontage, and four street trees would be planted and several planters installed at the ground level along the 940 Sycamore parcel's N. Orange Street frontage. The one existing tree and two small shrubbed areas on the 940 Sycamore parcel described previously would be removed. Landscaping around the Howard Hughes building on the 7000 Romaine parcel would remain unchanged.

3.3.4 Access, Circulation, and Parking

Vehicular access to the new uses would be from N. Orange Drive via one two-way driveway to the proposed parking structure. A second driveway along N. Orange Drive would provide access to the Project's loading dock and trash areas. Pedestrian and bicycle access to the new uses would be from N. Sycamore Avenue, thereby separating Project vehicular and pedestrian/bicycle traffic to enhance pedestrian/bicycle safety. Vehicular and pedestrian access to the existing Howard Hughes building would remain unchanged.

As indicated previously, vehicle parking for the Project would be provided in four levels of subterranean and five fully enclosed and mechanically ventilated levels of above-grade parking. A total of 809 on-site vehicle parking spaces would be provided, which would exceed the 536 spaces required by LAMC Section 12.21. The Project would also provide 64 bicycle parking spaces (comprised of 22 short-term spaces and 42 long-term spaces) on the ground floor. Showers and lockers would also be provided in the long-term bicycle parking area.

3.3.5 Lighting and Signage

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

Proposed signage would be designed to be aesthetically compatible with the architecture of the Project and with the requirements of the LAMC. Proposed signage would include mounted Project identity signage, building and commercial tenant signage, and general ground-level and wayfinding pedestrian signage. Wayfinding signs would be located at parking garage entrances, elevator lobbies, and vestibules. No off-site advertising is proposed as part of the Project.

3.3.6 Sustainability Features

The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but would not be limited to the following: electric vehicle charging stations; material recycling stations; highly efficient HVAC systems; energy-efficient wall insulation and glazing units; WaterSense-labeled

plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star–labeled appliances; water-efficient landscape design (i.e., grouping plants according to their water needs, use of native and low-water plants, etc.); and frit in the windows to minimize solar gain. In addition, the Project would also set aside an area as required by Title 24 for potential installation of solar panels at a later date.

3.3.7 Anticipated Construction Schedule

Construction of the Project is anticipated to begin in 2025 with completion by 2028. Construction would commence with demolition of the existing structures and surface parking on the 940 Sycamore parcel. This phase would be followed by grading and excavation on the 940 Sycamore parcel for the subterranean parking, the laying of building foundations, building construction, paving/concrete installation, and landscape installation. It is estimated that excavation to a maximum depth up to up to 73 feet will be required for the subterranean levels, and approximately 149,946 cubic yards of soil would be exported from the Project Site to the Sunshine Canyon Landfill using a City-approved construction haul route.¹¹

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The Environmental Impact Report will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Pursuant to LAMC Section 12.32-F and 12.32-Q, a Vesting Zone Change for the 940 Sycamore parcel from MR1 to M1-2D to allow for office and retail uses;
- Pursuant to LAMC Section 12.32-F, a Height District Change on the 940 Sycamore parcel from Height District 1 to Height District 2 to allow a 3:1 FAR;
- Pursuant to LAMC Section 12.24-W.1, a Main Conditional Use Permit (MCUP) to allow the sale or dispensing of alcoholic beverages for on-site consumption within the ground floor commercial space;
- Pursuant to LAMC Section 16.05, a Site Plan Review for the construction of up to 200,990 square feet of new nonresidential floor area;
- Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map to create five or more commercial condominiums; and

¹¹ The haul route is currently proposed as follows. From the Project Site: Exit north on N. Sycamore Ave. to Santa Monica Blvd., east on Santa Monica Blvd. to Western Avenue, north on Western Avenue to 101 NB on ramp. To the Project Site: Exit 101 SB at Cahuenga Blvd., south to Santa Monica Blvd., west on Santa Monica Blvd. to N. Sycamore Ave., south to the Project Site.

- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

3.5 RESPONSIBLE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (CEQA Guidelines Section 15381). No responsible agencies have been identified for the Project.

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

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

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that “visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA.”¹²

PRC Section 21099 applies to the Project. Therefore, the Project is exempt from aesthetic impacts. The analysis in this initial study (or in the EIR, if any aesthetic impact discussion is included), is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment. Any aesthetic impact analysis in this Initial Study (or the EIR) is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this Initial Study (or EIR) shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

¹² City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Except as provided in Public Resources Code Section 21099, would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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

No Impact. A scenic vista is a panoramic view of a valued visual resource. Based on the L.A. CEQA Thresholds Guide, panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. According to the L.A. CEQA Thresholds Guide, panoramic views are typically associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley mountain range, the ocean, or other water bodies.

As discussed in Section 3, Project Description, of this Initial Study, the Project Site is located in the highly urbanized Hollywood Community Plan area of the City. Land uses located adjacent to the Project Site include office, commercial, and parking structure uses to the north (across Romaine Street); office and commercial uses immediately adjacent to the Project Site to the south; digital media, light manufacturing, and surface parking uses to the east (across N. Orange Drive); and office, commercial, and parking structure uses to the west (across N. Sycamore Avenue). Due to the highly urbanized and built out surroundings, publicly available scenic vistas of any valued visual resources that may exist in the vicinity of the Project Site are not available. Therefore, development of the Project would not have a substantial adverse effect on a scenic vista since none currently exist.

Furthermore, pursuant to PRC Section 21099 and ZI File No. 2452, aesthetic impacts of the Project shall not be considered a significant impact on the environment. Therefore, no evaluation of this topic is required.

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

No Impact. The Project Site is not located along a State scenic highway. The nearest eligible state scenic highway is Interstate 210 (I-210) between Interstate 5 and State Route (SR) 134, located approximately 11 miles north of the Project Site and the nearest designated State scenic highway is SR-2 north of Interstate 210, which is located outside the City of Los Angeles, approximately 12 miles northeast of the Project Site.¹³ Thus, the Project would not substantially damage scenic resources within a designated scenic highway as there are no scenic highways along the Project Site. Regardless, pursuant to PRC Section 21099 and ZI File No. 2452, aesthetic impacts of the Project shall not be considered a significant impact on the environment. Therefore, no evaluation of this topic is required.

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

Less Than Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is located within the Hollywood Community Plan area of the City, in an urbanized area. As such, this analysis focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

As noted previously, the Project Site is located within the planning boundary of the Hollywood Community Plan.¹⁴ The Project Site has a General Plan land use designation of Limited Manufacturing and is zoned MR1-1 (Restricted Industrial, Height District 1).¹⁵ Pursuant to the LAMC, the MR1-1 Zone permits CM uses (i.e., wholesale, storage, clinics, limited manufacturing, limited C2 uses, and R3 uses), and limited commercial and manufacturing, clinic, media products, limited machine shop, and hospital and kennel uses.¹⁶ Height District 1 in conjunction with the MR1 Zone has no height limit and a maximum FAR of 1.5:1.¹⁷ The Project Site is also located within the boundaries of the Los Angeles State Enterprise Zone and is located within a City-designated TPA.¹⁸

¹³ Caltrans, List of Designated and Eligible State Scenic Highways, August 2019.

¹⁴ On May 3, 2023, the City Council adopted an update to the Hollywood Community Plan (Plan). The City Council also recommended an amendment requested in the motion from Council District 13 (Soto-Martinez) and a follow up report requested in the motion from Council District 4 (Raman). Information on the adopted Plan, amendment, and reports is available at <https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update#about>. The City Attorney will review and finalize the implementing ordinances to ensure clarity of regulations and consistency with state law, which can take approximately six months to a year. After this process is complete, the updated Plan will be brought into effect by the City Council.

¹⁵ City of Los Angeles, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for 948 N. Sycamore Avenue, 931 N. Orange Drive, and 7000 W. Romaine Street, June 2, 2022.

¹⁶ City of Los Angeles—Department of City Planning, Generalized Summary of Zoning Regulations, Table 1, Generalized Development Standards, updated March 2020.

¹⁷ City of Los Angeles—Department of City Planning, Generalized Summary of Zoning Regulations, Table 2, Height Districts, updated March 2020.

¹⁸ City of Los Angeles, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for 948 N. Sycamore Avenue, 931 N. Orange Drive, and 7000 W. Romaine Street, June 2, 2022.

Lastly, the Howard Hughes Headquarters Building on the 7000 Romaine parcel has special designation in the National Historic Register and SurveyLA, and is a City-designated Historic Cultural Monument.^{19,20}

As described in Section 3, Project Description, of this Initial Study, the Project would develop new office and retail uses totaling 200,990 square feet. Specifically, the Project would include the development of 194,597 square feet of office uses and 6,393 square feet of retail uses. The Project is requesting a Vesting Zone/Height District Change for the 940 Sycamore parcel from MR1-1 to MR1-2 to allow a 3.0 FAR. Upon approval of the Vesting Zone and Height District Change, the Project will be consistent with the zoning and land use designations on the Project Site.

With regard to the City's regulations governing scenic quality, local land use plans applicable to the Project Site also include policies governing scenic quality, including the Citywide General Plan Framework Element, Citywide Design Guidelines, and Hollywood Community Plan.²¹ The Project's consistency with the general intent of these plans is briefly discussed below.

Citywide General Plan Framework

The City General Plan Framework Element provides direction regarding the City's vision for future development in the City and includes an Urban Form and Neighborhood Design chapter to guide the design of future development. One of the key objectives of the Urban Form and Neighborhood Design Chapter is to enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm (Objective 5.5). The Project would upgrade the quality of development by replacing non-descript buildings and a surface parking lot and integrating new landscaping, including new and existing street trees along all street frontages. The Project would also include outdoor terraces that would be located on multiple levels throughout the building, featuring seating areas and landscaping, among other amenities. The new landscaping would be an improvement over existing conditions and would amplify the pedestrian-oriented nature of the Project's design.

Citywide Design Guidelines

The Citywide Design Guidelines establish guidelines to carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions. With respect to scenic quality, as discussed above, the Project would enhance the pedestrian experience with a new pedestrian-oriented building, extensive landscaping and open space, and new street trees along the street frontages.

¹⁹ City of Los Angeles, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 7000 W. Romaine Street, June 2, 2022.

²⁰ City of Los Angeles, SurveyLA Report for 7000 W. Romaine St. (Howard Hughes Headquarters Building), November 23, 2015.

²¹ The Hollywood Community Plan does not include policies governing scenic quality.

Hollywood Community Plan

Objective 7 of the Hollywood Community Plan encourages the preservation of open space and views, natural character, and topography of mountainous parts of the City. As discussed above, due to the highly urbanized and built out surroundings, publicly available scenic vistas of any valued visual resources that may exist in the vicinity of the Project Site are not available and the Project would not conflict with this objective.

Conclusion

Based on the above, the Project would not conflict with applicable zoning and other regulations governing scenic quality. Regardless, pursuant to PRC Section 21099 and ZI File No. 2452, aesthetic impacts of the Project shall not be considered a significant impact on the environment. Therefore, no evaluation of this topic is required.

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

Less Than Significant Impact. The Project Site currently generates moderate levels of light from interior light spillage from buildings, security lighting, pole lights within surface parking areas, and vehicle headlights in the surface parking areas. Existing glare sources within the Project Site include glass, architectural elements, and vehicle headlights. The Project Site is in an urbanized area and is surrounded by urban infrastructure, street lighting, and low- and mid-rise buildings with sources of daytime and nighttime light and glare. The Project would introduce new sources of light and glare that are typically associated with residential, office, and commercial buildings, including architectural, interior, security, and wayfinding light sources. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would require approval from the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on sidewalks and roadways while minimizing light and glare on adjacent properties.

Construction

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

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

Operation

Exterior lighting along the public areas would include pedestrian-scale (i.e., lower to the ground, spaced closer together) fixtures. Exterior lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the Project Site. Project lighting would be designed to minimize light trespass from the Project Site and would comply with all LAMC requirements. Night lighting at the Project Site would be low profile and at the necessary intensity to provide a safe walkable environment along walking paths. Roof terrace lighting would be of similar light levels, directed downward towards walkable surfaces, and shielded from view of the residential neighbors. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would require approval from the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on sidewalks and roadways while minimizing light and glare on adjacent properties.

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

With regard to glare, daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. Sun reflection can also occur with reflected light from parked vehicles. In general, building materials would include glass, pigmented concrete, metal cladding, and frit. In addition, all parking would be provided within four subterranean parking levels and five fully enclosed and mechanically ventilated above-grade parking levels. As such, there would be limited potential from glare associated with parked vehicles. Glass and metal used in building façades would also be low-reflective or treated with an anti-reflective coating to minimize glare.

Conclusion

Based on the above, Project operation would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Regardless, pursuant to PRC Section 21099 and ZI File No. 2452, aesthetic impacts of the Project shall not be considered a significant impact on the environment. Therefore, no evaluation of this topic is required.

II. AGRICULTURE AND FOREST RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The Project Site is located in an urbanized area of the City. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with four commercial buildings totaling 70,439 square feet and surface parking. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site and surrounding area are also not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.²² As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is zoned as MR1-1. Pursuant to the LAMC, the MR1-1 Zone permits CM uses (i.e., wholesale, storage, clinics, limited manufacturing, limited C2 uses, and R3 uses), and limited commercial and manufacturing, clinic, media products, limited machine shop, and hospital and kennel uses.²³ The Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area. The Project Site and surrounding area are also not enrolled under a Williamson Act contract.²⁴ Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act contract. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

²² City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 948 N. Sycamore Avenue, June 2, 2022.

²³ City of Los Angeles—Department of City Planning, Generalized Summary of Zoning Regulations, Table 1, Generalized Development Standards, updated March 2020.

²⁴ California Department of Conservation, The Williamson Act Status Report 2016-17.

No Impact. As previously discussed, the Project Site is located in an urbanized area and is currently developed with four commercial buildings totaling 70,439 square feet and surface parking. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned for commercial uses and is not zoned for forest land and is not used as forest land.²⁵ Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the Public Resources Code. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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

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

No Impact. As discussed above, the Project Site is located in an urbanized area of the City and does not include farmland or forest land. The Project Site and surrounding area are also not mapped as farmland or forest land, are not zoned for farmland/agricultural use or forest land, and do not contain any agricultural or forest uses.²⁶ As such, the Project would not result in the conversion of farmland to non-agricultural use or in the conversion of forest land to non-forest use. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

III. AIR QUALITY

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

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

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

²⁵ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 948 N. Sycamore Avenue, June 2, 2022.

²⁶ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 948 N. Sycamore Avenue, June 2, 2022.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (Air Basin). Within the Air Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [PM_{2.5}], and lead²⁷). SCAQMD’s 2022 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.²⁸ With regard to future growth, SCAG has prepared the Regional Transportation Plan/Sustainable Communities Strategy, which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG’s planning area. Construction and operation of the Project would result in an increase in stationary and mobile source air emissions. As a result, development of the Project could have a potential adverse effect on SCAQMD’s implementation of the AQMP. Therefore, the EIR will provide further analysis of the Project’s consistency with SCAQMD’s AQMP.

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

Potentially Significant Impact. As discussed above, construction and operation of the Project would result in the emission of air pollutants in the Air Basin, which is currently in non-attainment of federal

²⁷ Partial Nonattainment designation for lead for the Los Angeles County portion of the Basin only.

²⁸ SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.

air quality standards for ozone, PM_{2.5} and lead, and State air quality standards for ozone, particulate matter less than 10 microns in size (PM₁₀), and PM_{2.5}. Therefore, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Air Basin. The EIR will provide further analysis of cumulative air pollutant emissions associated with the Project.

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

Potentially Significant Impact. According to the California Air Resources Board, sensitive receptors include children, the elderly, asthmatics, and others who are at a heightened risk of negative health outcomes due to exposure to air pollution. The locations where these sensitive receptors congregate are considered sensitive receptor locations. As discussed above, the Project could result in increased short- and long-term air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Sensitive receptors located in the vicinity of the Project Site include residential uses to the south. Therefore, the Project could expose sensitive receptors to additional pollutant concentrations and the EIR will provide further analysis of the Project’s potential to result in substantial adverse impacts to sensitive receptors.

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

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

IV. BIOLOGICAL RESOURCES

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. The Project Site is located in an urbanized area and is currently developed with commercial buildings and surface parking. Landscaping within the Project Site is limited to common ornamental trees, grasses, and vines. Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings. Based on the lack of habitat on the Project Site, it is unlikely any special status species listed by the California Department of Fish and Wildlife (CDFW)²⁹ or by the U.S. Fish and Wildlife Service (USFWS)³⁰ would be present on-site. Furthermore, the Project Site is not located in or

²⁹ California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, August 2019.

³⁰ United States Fish and Wildlife Service, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, <https://ecos.fws.gov/ecp0/reports/ad-hoc-species-report>, accessed June 15, 2022.

adjacent to a Biological Resource Area as defined by the City.³¹ Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW or USFWS. No impact would occur, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

No Impact. The Project Site is located in an urbanized area and is currently developed with commercial buildings and surface parking. No riparian or other sensitive natural community exists on the Project Site or in the surrounding area.^{32,33} Furthermore, the Project Site and surroundings are not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County of Los Angeles.^{34,35} In addition, there are no other sensitive natural communities identified by the CDFW or the USFWS.^{36,37,38} Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As discussed above, the Project Site is located in an urbanized area and is currently developed with commercial buildings and surface parking. No water bodies or State and federally protected wetlands exist on the Project Site.³⁹ In addition, construction of the Project would not result in the removal, filling, or other means of hydrological interruption. As such, the Project would not have an adverse effect on State or federally protected wetlands. No impact would occur, and no mitigation measures are required. Therefore, no further evaluation of this topic in an EIR is required.

³¹ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

³² City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 948 N. Sycamore Avenue, June 2, 2022.

³³ United States Environmental Protection Agency, NEPAassist, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, accessed July 29, 2020.

³⁴ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

³⁵ Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

³⁶ California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), <https://apps.wildlife.ca.gov/bios/>, accessed June 15, 2022.

³⁷ California Department of Fish and Wildlife, CDFW Lands, <https://apps.wildlife.ca.gov/lands/>, accessed June 15, 2022.

³⁸ United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed June 15, 2022.

³⁹ United States Environmental Protection Agency, NEPAassist, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, accessed June 15, 2022.

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

Less Than Significant Impact. As described above, the Project Site is located in an urbanized area and is currently developed with commercial buildings and surface parking. In addition, the areas surrounding the Project Site are fully developed, and there are no large expanses of open space areas within and surrounding the Project Site that provide linkages to natural open spaces areas that may serve as wildlife corridors. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or the County of Los Angeles.^{40,41}

According to the Tree Survey prepared for the Project by Tree Case Management, Inc. in March 2022 and included in Appendix IS-1 of this Initial Study, there are two Ficus trees located within the Project Site, all within the 940 Sycamore parcel, and no street trees.⁴² The two Ficus trees would be removed as part of the Project. The two trees to be removed could potentially provide nesting sites for migratory birds. The Project would comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sale, purchase, barter, or offer for sale, purchase, or barter, of 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 & Game Code Section 3503 (Section 3503) states that “[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.” No exceptions are provided in the code and the CDFW has not promulgated regulations interpreting these provisions. Regulatory compliance with the Migratory Bird Treaty Act and California Fish and Game Code would require that tree removal activities take place outside of the nesting season (February 1–August 31), to the extent feasible. In addition, 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. Therefore, 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. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The City’s Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC) regulates the relocation or removal of all Southern California native oak trees (excluding scrub

⁴⁰ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

⁴¹ Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

⁴² There are two tree ferns in the main courtyard of 7000 Romaine, but these ferns are not protected. Regardless, because no development would occur on the 7000 Romaine parcel, they would remain in place.

oak), California black walnut trees, Western sycamore trees, California Bay trees, Mexican Elderberry, and Toyon shrubs of at least 4 inches in diameter at breast height. These native tree and shrub species are defined as “protected” by the City. Trees that have been planted as part of a tree planting program are exempt from the City’s Protected Tree Ordinance and are not considered protected. The City’s Protected Tree Ordinance prohibits, without a permit, the removal of any regulated protected tree, including “acts which inflict damage upon root systems or other parts of the tree [...]” and requires that all regulated protected trees that are removed be replaced on at least a 2:1 basis with trees that are of a protected variety.

According to the Tree Survey prepared for the Project by Tree Case Management, Inc. in March 2022 and included in Appendix IS-1 of this Initial Study, there are two Ficus trees located within the Project Site, both within the 940 Sycamore parcel, and no street trees.⁴³ The two Ficus trees would be removed as part of the Project. None of the trees located within the Project Site are considered protected trees. In accordance with the Department of City Planning’s policy, the on-site trees to be removed would be replaced on a 1:1 basis. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. As described above, the Project Site is located in an urbanized area and is currently developed with commercial buildings and surface parking. As also previously discussed, landscaping within the Project Site is limited, consisting of ornamental trees, shrubs, and ornamental landscaping, and the Project Site does not support any habitat or natural community^{44,45} No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.⁴⁶ Thus, the Project would not conflict with the provisions of any such plans. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

⁴³ There are two tree ferns in the main courtyard of 7000 Romaine, but these ferns are not protected. Regardless, because no development would occur on the 7000 Romaine parcel, they would remain in place.

⁴⁴ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 948 N. Sycamore Avenue, June 2, 2022.

⁴⁵ United States Environmental Protection Agency, NEPAAssist, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, accessed June 15, 2022.

⁴⁶ California Department of Fish and Wildlife, California Natural Community Conservation Plans, April 2019.

V. CULTURAL RESOURCES

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

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

Potentially Significant Impact. CEQA Guidelines Section 15064.5 generally defines a historical resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to PRC Section 5020.1(k)); or (3) identified as significant in a historical resources survey (meeting the criteria in PRC Section 5024.1(g)). Additionally, any object, building, structure, site, area, place, record, or manuscript which a Lead Agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the Lead Agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the Lead Agency to be "historically significant" if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register. The local register of historical resources is managed by the Los Angeles Office of Historic Resources, which established SurveyLA, a comprehensive program to identify potentially significant historic resources throughout the City. The Howard Hughes Headquarters Building on the Project Site is a historic resource and has special designation in the National Historic Register and SurveyLA, and is a City-designated HCM No. 1238. As such, the EIR will include an analysis of potential direct and indirect impacts to historical resources.

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

Less Than Significant Impact.

CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history."

Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community.

The Project Site is located within an urbanized area of the City of Los Angeles and has been subject to grading and development in the past. Therefore, surficial archaeological resources that may have existed at one time have likely been previously disturbed. On October 31, 2022, the staff at the South Central Coast Information Center (SCCIC) provided the results of a California Historical Resources Information System (CHRIS) records search for the Project site and a 0.5-mile radius. The results of this confidential records search are on file at the Department of City Planning and may be viewed by qualified personnel by appointment. The records indicate that no archeological resources have been recorded within the Project Site or within 0.5 mile of the Project Site. Nevertheless, the Project would require grading, excavation, and other construction activities up to a depth of 73 feet that could have the potential to disturb existing but undiscovered archaeological resources. Thus, the Project could have the potential to disturb previously undiscovered archaeological resources.

However, the City has established a standard condition of approval to address inadvertent discovery of archaeological resources. Should archeological resources be inadvertently encountered, this condition of approval provides for temporary halting of construction activities near the encounter so the find can be evaluated. An archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements.

With implementation of the City's established condition of approval to address any inadvertent discovery of archaeological resources, Project impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed above, the Project Site is located within an urbanized area and has been subject to previous grading and development. Therefore, the potential for uncovering human remains on the Project Site is low. Nevertheless, the Project would require grading, excavation up to 73 feet below ground surface, and other construction activities that could have the potential to disturb existing but undiscovered human remains. If human remains are discovered during construction of the Project, work in the immediate vicinity of the construction area would be halted, the County Coroner, construction manager, and other applicable 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 require 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 person or persons it believes to be most likely descended from the deceased Native American. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. Therefore, due to the low potential that any human remains are located on the Project Site, and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, the Project’s impact related to human remains would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

VI. ENERGY

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

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

Potentially Significant Impact. As discussed above, the Project Site is currently developed with four commercial buildings totaling approximately 70,439 square feet and surface parking. The Project would remove 3,535 square feet of the existing uses for the development of a new, 200,990-square-foot commercial building comprised of 194,597 square feet of office uses and 6,393 square feet of retail uses. Due to the increased floor area and type of uses, the Project would generate an increased demand for electricity and natural gas services provided by the Los Angeles Department of Water and Power (LADWP) and the Southern California Gas Company, respectively. While development of the Project would not be anticipated to cause wasteful, inefficient, and unnecessary consumption of energy resources, further analysis of the Project’s demand on existing energy resources will be provided in the EIR.

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

Potentially Significant Impact. First established in 2002 under SB 1078, California’s Renewable Portfolio Standard (RPS) required retail sellers of electric services to increase procurement from

eligible renewable energy resources to 20 percent of total retail sales by 2017.⁴⁷ The program was accelerated in 2015 with SB 350 which mandated a 50 percent RPS by 2030. In 2018, SB 100 was signed into law, which again increases the RPS to 60 percent by 2030 and requires all the State's electricity to come from carbon free resources by 2045. LADWP provides electrical service throughout the City. LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. In accordance with SB 100, LADWP is required to procure at least 60 percent of its energy portfolio from renewable sources by 2030.

Regarding energy efficiency, the California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction, system design, and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2019 Title 24 standards, which became effective on January 1, 2020.⁴⁸ The 2019 Title 24 standards include efficiency improvements to the non-residential standards that align with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1 2017 national standards.⁴⁹

As discussed above, the Project Site is currently developed with four commercial buildings totaling approximately 70,439 square feet and surface parking. The Project would remove 3,535 square feet of the existing uses for the development of a new, 200,990-square-foot commercial building comprised of 194,597 square feet of office uses and 6,393 square feet of retail uses. The Project Site does not include any renewable energy sources used by LADWP. The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. While the Project would not be anticipated to conflict with or obstruct a State or local plan for renewable energy or energy efficiency, the Project's compliance with LADWP's plans for renewable energy as well as the Project's compliance with California Building Energy Efficiency Standards will be further evaluated in the EIR.

⁴⁷ CPUC, California Renewables Portfolio Standard (RPS) Program, www.cpuc.ca.gov/rps/, accessed June 20, 2022.

⁴⁸ CEC, 2019 Building Energy Efficiency Standards, www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency/, accessed June 20, 2022.

⁴⁹ CEC, 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, December 2018.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The following analysis is based in part on the Geotechnical Investigation prepared for the Project by GeoPentech dated May 3, 2022. All specific information on geologic and soils conditions in the discussion below is from this report unless otherwise noted. This report is included as Appendix IS-2 of this Initial Study.

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

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

Less Than Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement within the last 1.6 million years. In addition, buried thrust faults, which are faults with no surface exposure, may exist in the vicinity of the Project Site; however, due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

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

The Project Site is not located within an Earthquake Fault Zone as mapped by CGS.⁵⁰ The closest active fault is the Hollywood Fault located approximately 1.1 miles north of the Project Site.⁵¹ Additionally, the Project Site is not located within 1,000 feet of a mapped Holocene-active fault based on a review of mapping by USGS (refer to Figure 4a of the Geotechnical Investigation). Therefore, the Project Site is not susceptible to surface fault rupture hazards, and impacts would be less than significant. No further evaluation of this topic in an EIR is required.

ii. **Strong seismic ground shaking?**

Less Than Significant Impact. The Project Site is located in the seismically active region of Southern California and would potentially be subject to strong seismic ground shaking if a moderate to strong earthquake occurs on a local or regional fault. As discussed above, no active faults are known to pass directly beneath the Project Site and the Project Site is not located in an Alquist-Priolo Earthquake Fault Zone. According to ZIMAS, the closest active fault is the Hollywood Fault located

⁵⁰ State of California, California Geological Survey, Earthquake Zones of Required Investigation, Hollywood Quadrangle, Earthquake Fault Zones, November 6, 2014.

⁵¹ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 948 N. Sycamore Avenue, June 2, 2022.

approximately 1.1 miles north of the Project Site. State and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. Specifically, the State and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the City's General Plan Safety Element, and the Los Angeles Building Code. Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions thereof before permits can be issued for construction of the Project. Accordingly, the design and construction of the Project would comply with all applicable existing regulatory requirements, the applicable provisions of the Los Angeles Building Code relating to seismic safety, and the application of accepted and proven construction engineering practices. The Los Angeles Building Code incorporates current seismic design provisions of the California Building Code, with City amendments, to minimize seismic impacts. The 2022 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 geotechnical report for the Project, which will be subject to review and approval by LADBS.

Based on the above, through compliance with regulatory requirements and site-specific geotechnical recommendations, the Project would not directly or indirectly cause potential substantial adverse effects involving strong seismic ground shaking. Therefore, the Project's impact related to strong seismic ground shaking would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction occurs when loose, saturated, granular soils lose their strength due to excess water pressure that builds up during repeated movement from seismic activity. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Factors that contribute to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking. The effects of liquefaction include the loss of the soil's ability to support footings and foundations which may cause buildings and foundations to buckle.

According to the CGS map of Earthquake Zones of Required Investigation for the Hollywood Quadrangle and the County of Los Angeles Seismic Safety Element, the Project Site is not located within an area identified as having a potential for liquefaction. This is consistent with the results of the field investigation conducted as part of the Geotechnical Investigation, which did not encounter soils susceptible to liquefaction. As such, liquefaction is not considered to be a hazard at the Project Site, and impacts would be less than significant. No further evaluation of this topic in an EIR is required.

iv. Landslides?

No Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and the Project Site is generally characterized by relatively level topography. Large areas of exposed soil and/or rocks that could fall onto the Project Site would not typically exist, since the majority of the Project Site is covered in pavement and landscaping is confined to ornamental trees. In addition, the Project Site is not located in a landslide area as mapped by the State,⁵² nor is the Project Site mapped as a landslide area by the City of Los Angeles.⁵³ Therefore, the Project would not directly or indirectly cause potential substantial adverse effects involving landslides. As such, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The Project Site is currently fully developed with buildings and surface parking areas. As such, there are no open spaces with exposed topsoil. However, development of the Project would require grading, excavation, and other construction activities that have the potential to disturb existing soils underneath the Project Site and expose these soils to rainfall and wind during construction, thereby potentially resulting in soil erosion. This potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities. Specifically, all grading activities would require grading permits from 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 Chapter IX, Article 1 of the LAMC, which addresses grading, excavations, and fills. Furthermore, the Project would be required to comply with the City's Low Impact Development (LID) ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Regarding soil erosion during Project operations, the potential would be negligible since the Project Site would mostly remain fully developed. Therefore, with compliance with applicable regulatory requirements, impacts regarding soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed above, the Project Site is not located in a landslide area as mapped by the State or by the City. Upon buildout of the Project, the existing topography of the Project Site would not be substantially altered. Specifically, the Project Site would remain relatively flat and would not cause landslides. As such, no impacts related to landslides would occur, and no mitigation measures related to landslides are required.

⁵² State of California, California Geological Survey, Earthquake Zones of Required Investigation, Hollywood Quadrangle, Seismic Hazard Zones, March 25, 1999.

⁵³ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 948 N. Sycamore Avenue, June 2, 2022.

Liquefaction-related effects include lateral spreading. As discussed above, while the Project Site is not located in an identified liquefiable area, and the Geotechnical Investigation confirmed the soils beneath the site are not susceptible to liquefaction. As such, impacts related to liquefaction would be less than significant, and no mitigation measures are required.

Seismically-induced settlement may be caused by unsaturated loose to medium-dense granular soils densifying during ground shaking. Uniform settlement beneath a given structure would cause minimal damage; however, because of variations in distribution, density, and confining conditions of the soils, seismically-induced settlement is generally non-uniform and has the potential to cause serious structural damage. Excavation for the Project's subterranean levels would extend below the groundwater, thereby removing all the unsaturated soils that are potentially susceptible to seismically-induced settlement. Accordingly, seismically-induced settlement at the Project Site is considered to be negligible and impacts would be less than significant.

Ground surface subsidence generally results from the extraction of fluids or gas from the subsurface that can result in the gradual lowering of the overlying ground surface. Subsidence can also occur when subsurface peat deposits oxidize and undergo volume loss. As there are no known ongoing extractions of oil or water that would lead to subsidence at the Project Site, and the subsurface soils are not known to contain significant quantities of peat, the potential for subsidence at the Project Site is considered low. Impacts would be less than significant, and no mitigations are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. As noted in the Geotechnical Investigation, the on-site clayey soils are anticipated to be moderately expansive. However, Project design and construction would comply with all applicable requirements of LADBS for a site with underlying expansive soils as well as site-specific design recommendations set forth in the Geotechnical Investigation. Therefore, with adherence to existing regulations and site-specific design recommendations, impacts related to expansive soils would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is located within a community served by existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would not have an impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Potentially Significant Impact. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Although the Project Site has been previously graded and developed, the Project would require grading, excavation, and other construction activities that could have the potential to disturb existing but undiscovered paleontological resources. Therefore, the EIR will provide further analysis of the Project’s potential impacts to paleontological resources.

VIII. GREENHOUSE GAS EMISSIONS

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

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

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

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

Potentially Significant Impact. As the Project would have the potential to emit greenhouse gases, the EIR will include further evaluation of project-related emissions and associated emission reduction strategies to determine whether the Project conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases (e.g., Assembly Bill [AB] 32 and SCAG’s RTP/SCS).

IX. HAZARDS AND HAZARDOUS MATERIALS

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

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

Less Than Significant Impact. The Project would not involve the routine transport of hazardous materials to and from the Project Site. During demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be routinely used on the Project Site through the duration of construction. While some hazardous materials used during construction could require disposal, such activity would occur only for the duration of construction and

would cease upon completion of the Project. As such, construction of the Project would not involve the routine disposal of hazardous materials. Notwithstanding, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, there are regulations aimed at establishing specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. The Project would be in full compliance with all applicable federal, State, and local requirements concerning the use, storage, and management of hazardous materials, including, but not limited to the Resource Conservation and Recovery Act, California Hazardous Waste Control Law, Federal and State Occupational Safety and Health Acts, SCAQMD rules, and permits and associated conditions issued by LADBS. Such requirements include obtaining material safety data sheets from chemical manufacturers, making these data sheets available to employees, labeling chemical containers in the workplace, developing and maintaining a written hazard communication program, and developing and implementing programs to train employees about hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in commercial uses, including cleaning products, paints, and those used for maintenance of landscaping. Such use would be consistent with that currently occurring on the Project Site and other nearby developments. As a commercial office development, the Project would not involve the routine transport, use, and disposal of large quantities of hazardous materials. The Project's limited use of common hazardous materials can typically be disposed of at Class II or III landfills, which accept most common waste materials, such as those identified above. In addition, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with all applicable federal, State, and local requirements.

Based on the above, with compliance with all applicable local, State, and federal laws and regulations relating to environmental protection and the management of hazardous materials, the Project's impact associated with the routine transport, use, or disposal of hazardous materials during construction and operation of the Project would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The current and past land uses within the Project Site were identified as part of the Phase I Environmental Site Assessment (Phase I ESA) prepared for the Project by Weis Environmental in September 2021 and included as Appendix IS-3 of this Initial Study to assess their potential to present concerns relative to the presence of hazards and/or the handling of hazardous materials. These concerns are classified as Recognized Environmental Conditions (RECs), which are defined in Section 1.1.1 of the American Society for Testing and Materials (ASTM) Standard Practice as the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, past release, or material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground,

groundwater, or surface water of the property. As part of the Phase I ESA, Weis Environmental also performed a visual reconnaissance of the Project Site on July 29, 2021.

A detailed historical review is provided in Section 6.0 of the Phase I ESA. As discussed therein, historical aerial photographs dating between 1948 and 2018 and fire insurance maps from 1926, 1950, and 1969 were reviewed. The Project Site was undeveloped in 1926, but by 1948 it appears similar to its current configuration, as to the adjoining properties. Historical city directory listings indicate that the Project Site has been historically used by various film production related businesses. No indications of releases have been reported and there were no features observed within visible and accessible areas of the building interior that would indicate that substantial releases of chemicals had occurred. Therefore, the Phase I ESA concluded that the historical uses of the Project Site are not considered to be a significant environmental concern. In addition, adjoining and nearby properties in the surrounding area are generally used for residential, general commercial/retail, film production, and light industrial purposes, and the Phase I ESA concluded that these nearby uses are not considered to be significant environmental concerns to the Project Site.

Construction

Underground Storage Tanks

A previous Phase I ESA speculated that a potential UST may be located in the sidewalk area near the southeast corner of the Howard Hughes Headquarters Building. However, this suspected UST, if present, is in the adjacent sidewalk area and is not located within the limits of the Project Site. In the unlikely event that this or other USTs are found, suspect materials would be removed in accordance with all applicable federal, State, and local regulations. For example, if USTs are encountered, prior to removal, applicable permits would be obtained from the Los Angeles Fire Department (LAFD). 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 the potential removal of USTs during construction would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Aboveground Storage Tanks

Several aboveground storage tanks (ASTs) were observed in the basement/subsurface areas during site reconnaissance. The tanks appear to be associated with various formerly used utility systems. No significant staining, odors, or other suspect conditions were noted. If the ASTs are to be removed as part of construction, prior to removal, applicable permits would be obtained from LAFD. 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 the potential removal of USTs during construction would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Polychlorinated Biphenyls

Typical sources of PCBs include electrical transformer cooling oils, fluorescent light fixture ballasts, and hydraulic oil. In 1976, the United States Environmental Protection Agency (USEPA) banned the

manufacture and sale of PCB-containing transformers. Older electrical transformers and various equipment including hydraulic lifts and elevators on the Project Site may contain PCBs. No significant staining, odors, or other suspect conditions were noted. If any of these are to be removed during construction, all suspect materials would be removed in accordance with all applicable federal, State, and local regulations. 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 the removal of PCBs during demolition would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Asbestos-Containing Materials

Asbestos was widely used in the building industry starting in the late 1800s and up until the late 1970s for a variety of uses, including acoustic and thermal insulation and fireproofing, and is often found in ceiling and floor tiles, linoleum, pipes, structural beams, and asphalt. Any building, structure, surface asphalt driveway, or parking lot constructed prior to 1979 could contain asbestos or ACMs. Based on the age of the structures on the Project Site, asbestos-containing building materials may be present on the Project Site. In the event 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, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment. Therefore, with compliance with applicable regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts related to the removal of ACMs during demolition would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Lead-Based Paint

Lead is a naturally occurring element and heavy metal that was widely used as a major ingredient in most interior and exterior oil-based paints prior to 1950. Lead compounds continued to be used as corrosion inhibitors, pigments, and drying agents from the early 1950s to 1972, when the Consumer Products Safety Commission specified limits on lead content in such products. Based on the age of the on-site buildings, LBP may be present on the Project Site. 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 demolition activities, including standard handling and disposal practices pursuant to OSHA regulations. Example procedural requirements include the use of respiratory protection devices while handling lead-containing materials, containment of lead or materials containing lead on the Project Site or at locations where construction activities are performed, and certification of all consultants and contractors conducting activities involving LBP or lead hazards. 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. 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 the removal of LBP during

demolition would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

Methane

The Project Site is also located within a designated Methane Buffer Zone mapped by the City.^{54,55} Requirements for the control of methane intrusion in the City are specified in Division 71 of Article 1, Chapter IX of the LAMC (Division 71). Since the Project Site is located within the methane zone, the LADBS has the authority to withhold permits for construction unless detailed plans for adequate protection against methane are submitted. The level of methane protection required (if any) is based upon the “design methane concentration” which is defined in Division 71 as “the highest concentration of methane gas found during site testing”. Site testing is required to determine the design concentration unless the developer accepts the most stringent methane mitigation requirements (“Level V”), with any site testing required to follow the protocols established by LADBS’, “Site Testing Standards for Methane”.⁵⁶

In accordance with LADBS requirements, subsurface methane testing was conducted on the portion of the Project Site proposed for construction (i.e., 940 Sycamore Parcel), with the results summarized and evaluated in a Methane Investigation Report (Methane Report) prepared for the Project and included as Appendix IS-4 of this Initial Study. As indicated in Exhibit 2, Probe Locations Map, of the Methane Report, nine shallow (4-foot deep) and five multiple-depth (5-20 feet deep) gas probes were installed on the 940 Sycamore parcel. As indicated in Exhibit 4, Methane Test Data, of the Methane Report, methane gas was detected by the probes at concentrations below the levels that require a methane mitigation system. Therefore, in accordance the minimum methane mitigation requirements outlined in the Methane Code Table included as Exhibit 5 of the Methane Report, the report concludes that the Project falls under Design Level II which, per the table, does not require a methane mitigation system.⁵⁷

Therefore, the Project Site does not contain significantly elevated concentrations of methane, and there would not be unacceptable health risk to Project occupants. In addition, adherence to standard construction safety measures, as well as compliance with California Occupational Safety and Health Act (OSHA) safety requirements, would serve to reduce the risk in the event that elevated levels of gases are encountered during grading and construction. Therefore, with compliance with applicable regulatory measures, impacts related to methane would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

⁵⁴ Methane Specialists, Methane Investigation Report – 948 N. Sycamore Avenue, September 23, 2022.

⁵⁵ City of Los Angeles, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for 931 N. Orange Dr, 948 Sycamore Ave, and 7000 W Romaine St., June 2, 2022.

⁵⁶ Methane Specialists, Methane Investigation Report – 948 N. Sycamore Avenue, September 23, 2022.

⁵⁷ Methane Specialists, Methane Investigation Report – 948 N. Sycamore Avenue, September 23, 2022.

Operation

Underground and Aboveground Storage Tanks

The Project does not propose the installation of USTs or ASTs. As such, operation of the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts associated with USTs or ASTs during operation of the Project would be less than significant. No further analysis of this topic in an EIR is required.

Polychlorinated Biphenyls

In accordance with existing regulations which ban the manufacture of PCBs, the new electrical systems to be installed as part of the Project would not contain PCBs. Therefore, during operation of the Project, maintenance of such electrical systems would not expose people to PCBs and operation of the Project would not expose people to any risk resulting from the release of PCBs in the environment. Therefore, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and no impacts related to PCBs during Project operation would occur. No further analysis of this topic in an EIR is required.

Asbestos-Containing Materials

Development of the Project would include the use of commercially-sold construction materials that would not include asbestos or ACMs because new asbestos products are no longer permitted in the marketplace. Project operation is, therefore, not anticipated to increase the occurrence of friable asbestos or ACMs at the Project Site. Therefore, operation of the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and no impacts associated with asbestos or ACMs during operation of the Project would occur. No further analysis of this topic in an EIR is required.

Lead-Based Paint

Development of the Project would include the use of commercially-sold construction materials that would not include LBP because the product is no longer widely used. Project operation is, therefore, not anticipated to increase the occurrence of LBP at the Project Site. Operation of the Project would not expose people to LBP as no LBPs would be used. Thus, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts associated with LBP during operation of the Project would not occur. No further analysis of this topic in an EIR is required.

Methane Gas

The Project Site is located within a Methane Buffer Zone and would comply with the City of Los Angeles' Methane Mitigation Ordinance No. 175790. As the permitting process would ensure that new development would comply with the City's Methane Mitigation Ordinance and the Project does not include uses that would produce methane gas, the Project would not create a significant hazard to

the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts associated with the release of methane gas during operation would be less than significant. No further analysis of this topic in an EIR is required.

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

Less Than Significant Impact. There is one existing school within 0.25 miles of the Project Site. Hubert Howe Bancroft Middle School is located approximately 0.22 miles east of the Project Site at 929 North Las Palmas Avenue. As previously discussed, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed uses would be typical of office developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used within and in the vicinity of the Project Site. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Specifically, the Project does not involve the development of industrial or other uses that would emit large amounts of chemicals or acutely hazardous materials. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. As such, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

d. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?

Less Than Significant Impact. California Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While California Government Code Section 65962.5 makes reference to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the California Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions or extensive investigations are planned or have occurred. The database provides a listing of federal cleanup sites, State response sites, voluntary cleanup sites, and school cleanup sites.

The Phase I ESA for the Project Site obtained a database search report that documents findings of various federal, State, and local regulatory database searches regarding properties with known or suspected releases of hazardous materials. "Producers Film Center" is identified on the Project Site as a small quantity generator of hazardous waste. No violations were noted and the Project Site is not listed in databases indicative of releases of hazardous substances or petroleum products to the

subsurface. The Producers Film Center is also listed on the non-ASTM HAZNET regulatory database for the manifesting and removal of asbestos containing materials and off-specification, aged, or surplus organic waste. This is interpreted to be the result of prior asbestos abatement activities and the removal of film-related wastes. As concluded in the Phase I, neither listing is considered to be a significant environmental concern to the Project Site.

Therefore, based on the above, impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

No Impact. The Project Site is not located within an airport land use plan or within two miles of a public airport or public use airport. The nearest airport is the Hollywood-Burbank Airport located approximately 7 miles north of the Project Site. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The nearest emergency/disaster routes to the Project Site are La Brea Avenue 0.07 miles west of the Project Site and Santa Monica Boulevard 0.12 miles north of the Project Site.⁵⁸ While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, both directions of travel would continue to be maintained in accordance with standard construction traffic management plans that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. Therefore, the Project would not impede emergency access within the Project Site or vicinity that could cause an impediment along City designated disaster routes such that the Project would impair the implementation of the City's emergency response plan. As such, the Project's impact related to the implementation of the City's emergency response plan would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is located in an urbanized area of the City and there are no wildlands located on or in the vicinity of the Project Site. The Project Site is not located within a City-designated

⁵⁸ City of Los Angeles, Geohub, Disaster Routes, <https://geohub.lacity.org/datasets/lacounty::disaster-routes-1/explore?location=34.087865%2C-118.341791%2C17.00>, accessed June 21, 2022.

Very High Fire Hazard Severity Zone or within Fire District No. 1.⁵⁹ Accordingly, the Project would not expose people or structures to a risk of loss, injury, or death involving wildland fires. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

⁵⁹ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 948 N. Sycamore Avenue, June 2, 2022.

The following analysis is based, in part, on the *Romaine and Sycamore Hydrology and Water Quality Report* (Hydrology Report) prepared for the Project by KPFF Consulting Engineers, dated October 10, 2022, and included as Appendix IS-5 of this Initial Study.

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

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

Surface Water Quality

Construction

Construction activities such as earth moving, maintenance/operation of construction equipment, and handling/storage/disposal of materials could contribute to pollutant loading in stormwater runoff. However, the Project would be required to obtain coverage under the NPDES Construction General Permit (i.e., order No. 2009-0009-SWQ, as well as its subsequent amendments 2010-0014-DWQ and 2012-0006-DWQ). In accordance with the requirements of the permit, the Applicant would prepare and implement a site-specific stormwater pollution prevention plan (SWPPP) adhering to the California Stormwater Quality Association BMP Handbook. The SWPPP would specify BMPs to be used during construction. BMPs would include, but would not necessarily be limited to: erosion control, sediment control, non-stormwater management, and materials management BMPs.

With the implementation of site-specific BMPs included as part of the SWPPP, the Project would reduce or eliminate the discharge of potential pollutants from the stormwater runoff. In addition, the Applicant would be required to comply with City grading permit regulations, which require implementation of necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspection to reduce sedimentation and erosion. Therefore, with compliance with NPDES requirements and City grading regulations, construction of the Project would not result in discharge that would cause: (1) pollution which would alter the quality of the water of the State (i.e. Ballona Creek) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the water of the State by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes. Furthermore, construction of the Project would not result in discharges that would cause regulatory standards to be violated in Los Angeles River. Based on the above, with compliance with these existing regulatory requirements that include specific BMPs to address surface water quality, impacts during construction would be less than significant.

Operation

As expected for most urban developments, operation of the Project has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project

include sediment, nutrients, pesticides, metals, oil, and grease. However, the Project would be required to implement standard urban stormwater mitigation plan (SUSMP) and LID requirements throughout the operational life of the Project. As part of these requirements, the Project would prepare a SUSMP which would outline the stormwater treatment measures or post-construction best management practices (BMPs) required to control pollutants of concern. The LID Manual prioritizes BMPs with infiltration systems as the top tier priority BMP. However, based on the explorations of the Project Site, infiltration is considered to be infeasible and based on the footprint of the proposed buildings and the depth of basement levels a capture and use system would be the main LID BMP system for the Project Site.

The pollutants listed above would be mitigated through the implementation of approved LID BMPs. In addition, the implementation of the following LID BMPs would be included as part of the SUSMP for the Project to manage post-construction stormwater runoff:

- Promote evapotranspiration and infiltration, and the use of native and/or drought tolerant plants;
- Provide storm drain system stenciling and signage to discourage illegal dumping;
- Design material storage areas and loading docks within structures or enclosures to prevent leaks or spills of pollutants from entering the storm drain system;
- Provide evidence of ongoing BMP maintenance as part of a legal agreement with the City of Los Angeles. Recorded covenant and agreements for BMP maintenance are part of standard building permit approval processing; and
- Design post-construction structural or treatment control BMPs to infiltrate stormwater runoff. Stormwater treatment facilities and systems would be designed to meet the requirements of the SUSMP and LID Manual.

The Project Site currently does not have structural BMPs in place for the treatment of stormwater runoff from the existing impervious surfaces. Therefore, implementation of BMP systems proposed as part of the Project would result in a substantial improvement in surface water quality runoff from the Project Site. In implementation of BMPs, which would utilize the natural adsorption⁶⁰ and filtration characteristics of vegetated pervious surfaces, would allow for more opportunities to direct stormwater to flow through the planting media where pollutants are filtered, absorbed, and biodegraded by the soil and plants. However, due to the limited vegetated area of both the existing and proposed Project site, these effects are expected to be less than the proposed structural BMPs described above in terms of incremental improvement of existing conditions.

Based on the above, with implementation of BMPs such as those described above, operation of the Project would not result in discharges that would cause: (1) an incremental increase in pollution which would alter the quality of the waters of the State (i.e., Ballona Creek) to a degree which unreasonably affects beneficial uses of the waters; (2) an incremental increase of contamination of the quality of the waters of the State by waste to a degree which creates a hazard to the public health through

⁶⁰ Adsorption is the attachment of pollutants in water to soil particles, resulting in retention of pollutants.

poisoning or through the spread of diseases; or (3) an incremental increase in the nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes. Furthermore, operation of the Project would not result in discharges that would cause regulatory standards to be violated in the Santa Monica Bay

Therefore, with implementation of the BMPs described above that would be implemented in accordance with regulatory requirements, operational impacts on surface water quality would be less than significant.

Groundwater Quality

Construction

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases into groundwater. Compliance with all applicable federal, State, and local requirements concerning the handling, storage and disposal of hazardous waste, would reduce the potential for the construction of the Project to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. Therefore, the Project's potential impact on groundwater quality during construction is less than significant.

Operation

Operational activities which could affect groundwater quality include spills of hazardous materials and leaking underground storage tanks. Surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner, thereby resulting in little threat to groundwater. In addition to the underground LID BMP systems described above, multiple underground stormwater storage pipes/tanks may be also operated by the Project. All tanks will be installed and maintained in compliance of all existing regulations.

In addition, while the development of expanded facilities would increase the use of existing on-site hazardous materials, compliance with all applicable existing regulations at the Project Site would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in CCR, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act.

Furthermore, as discussed further below, operation of the Project would not require extraction from the groundwater supply as the below ground walls would be designed to withstand hydrostatic and buoyant forces. The Project does not include the installation or operation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility. The Project does not include surface or subsurface application or introduction of potential contaminants or waste materials during construction or operation. The Project is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise

reach groundwater through percolation. Additionally, the Project would include the installation of structural BMPs as a means of pretreatment prior to capture and use of the first flush or equivalent of the greater between the 85th percentile storm event and the first 0.75 inch of rainfall for any storm event, which would allow for treatment of runoff generated on-site prior to contact with the groundwater below. Therefore, the Project's potential impact on groundwater quality during operation is less than significant.

Conclusion

As discussed above, neither construction or operation of the Project would violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

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

Construction

Construction activities for the Project would include demolition of existing hardscape areas, excavating down to a maximum depth of 73 feet below grade to build up the underground structure, building up the structures, and constructing hardscape and landscape around the structures. Since measured groundwater was discovered at a depth of 16-18 feet below grade, temporary dewatering operations are expected. When groundwater is encountered during the construction, temporary pumps and filtration would be utilized in compliance all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations. The temporary dewatering will be active during excavation and during the construction of the basement slabs and basement walls. The walls and slab will be designed to withstand hydrostatic and buoyant forces, and the groundwater is expected to return to measured levels following completion of the Project, including its subterranean levels. Therefore, the Project would not substantially deplete groundwater supplies in a manner that would result in a net deficit in aquifer volume or lowering of the local groundwater table. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Operation

The percolation of precipitation that falls on pervious surfaces is variable dependent upon the soil type, condition of the soil, vegetative cover, and other factors. The implementation of the Project would include the addition of pervious surfaces throughout the Project Site boundary. Specifically, the Project Site is 95.5 percent impervious under existing conditions and would be 80.25 percent impervious with the Project. However, as the Project is located in a highly urbanized area, any change in groundwater recharge due to the overall net change in impervious area would be minimal in the context of the regional groundwater basin. Furthermore, as discussed above, the Project would

include the installation of SUSMP and LID BMPs. These measures would mitigate at minimum the first flush or the equivalent of the greater between the 85th percentile storm and first 0.75-inch of rainfall for any storm event. The installed BMP systems will be designed with an internal bypass or overflow system to prevent upstream flooding due to large storm events. The stormwater that bypasses the BMP systems would discharge to an approved discharge point in the public right-of-way and not result in infiltration of a large amount of rainfall, which would affect groundwater hydrology, including the direction of groundwater flow. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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

Less Than Significant Impact. Although no streams or rivers cross the Project Site, construction activities for the Project would include excavation up to 73 feet for subterranean parking levels, as well as grading for building structures, foundations, and hardscape and landscape around the structures. It is estimated that approximately 149,946 cubic yards of export would be hauled from the Project Site. These activities have potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Also, exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as discussed above, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, through implementation of BMPs, as described below and compliance with applicable City grading permit plan check process, the Project would not result in substantial erosion or siltation on- or off-site. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Existing impervious surfaces include buildings and impervious pavements for pedestrian and vehicular circulation and existing pervious surfaces include landscaped areas. Under existing conditions, the Project Site is divided into two drainage areas. Drainage Area A consists of the existing building to remain in place and drains via roof drains that discharge through four curb drains and sheet flows into an existing curb inlet catch basin located at the northeastern side of Willoughby Avenue and La Brea Avenue. Drainage Area B consists of the surface parking lot, which sheet flows southwest until it enters a catch basin located at the northeastern sign of Willoughby Avenue and La Brea Avenue.

Development of the Project would include development of new buildings, paved areas, and landscaped areas, while retaining the two drainage areas that would drain via building roof drains, surface flow, and subterranean drainage to the proposed BMP. Upon completion, the amount of impervious surfaces would decrease from 95.5 to approximately 80.25 percent. In addition, as discussed above, the Project would implement a capture and use system to comply with LID

requirements. This system, which would be required to accommodate 2,203 cubic feet of stormwater, would not result in any increase in runoff. Specifically, stormwater flows would be 6.49 cubic feet per second during a 50-year storm event, the same as under existing conditions. Therefore, the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required

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

Less Than Significant Impact. Refer to Response to Checklist Questions X.a and X.c.ii, above. As discussed in Response to Checklist Question X.a, the Project would implement capture and use systems to collect and store the first flush of stormwater runoff to satisfy LID requirements and use it for irrigation. Based on the proposed landscape area and irrigation demands, a capture and reuse system is feasible for the Project Site. The capture and use system will be designed to comply with the most current LID standards. Compliance with the LID requirements for the Project Site would ensure stormwater treatment with post-construction BMPs that are required to control pollutants associated with storm events up to the 85th percentile storm event, per the City's Stormwater Program. As the Project Site currently does not have structural BMPs for the treatment of stormwater runoff from the existing impervious surfaces, implementation of the proposed BMPs would result in an improvement in surface water quality runoff from the entire Project Site. In addition, as discussed in Response to Checklist Question X.c.ii, upon completion, the amount of impervious surfaces on the Project Site would decrease from 95.5 percent to 80.25 percent. In addition, as also discussed above, the Project would implement a capture and use system to comply with LID requirements. This system, which would be required to accommodate 2,203 cubic feet of stormwater, would not result in any increase in runoff. Specifically, stormwater flows would be 6.49 cubic feet per second during a 50-year storm event. Therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

iv. impede or redirect flood flows?

No Impact. The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City.^{61,62} Thus, the Project would not impede or redirect flood flows. No impacts would occur, and no mitigation measures would be required. No further analysis of this topic in an EIR is required.

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

⁶¹ Federal Emergency Management Agency, Flood Insurance Rate Map 06037C1605F, September 26, 2008.

⁶² City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 948 N. Sycamore Avenue, June 2, 2022.

Less Than Significant Impact. As discussed above, the Project Site is not located within a 100-year flood hazard area as mapped by FEMA or by the City. In addition, the Project Site is located approximately 11 miles northeast of the Pacific Ocean. Therefore, no tsunami or tsunami events would be expected to impact the Project Site. Furthermore, there are no standing bodies of water near the Project Site that may experience a seiche.

Earthquake-induced flooding can also result from the failure of dams or other water-retaining structures resulting from earthquakes. According to the California Department of Water Resources (DWR), the Project Site is located within a potential inundation area associated with Mulholland Dam.⁶³ The Mulholland Dam is located in the Hollywood Hills approximately 2.0 miles northeast of the Project Site. Although the Project Site is mapped within an inundation zone for the dam, catastrophic failure of this dam is expected to be a very unlikely event in that dam safety regulations exist and are enforced by the Division of Safety of Dams, Army Corp of Engineers, and DWR. Inspectors would require dam owners to perform work, maintenance or implement controls if issues are found with the safety of the dam. The dams are under continuous monitoring for safety against failure and the potential for seismically-induced flooding to affect the Project Site due to dam failure is low. Therefore, the risk of flooding from inundation by dam failure is considered low.

Additionally, as discussed above, the Project would include new structural BMPs throughout the Project Site which would reduce the amount of pollutants entering the stormwater system and groundwater in the unlikely event of inundation of the Project Site. Impacts would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed above, Project construction could result in erosion of exposed and stockpiled soils, increased pollutant loading due to on-site watering activities, and pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel. However, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. BMPs to be used during construction would include, but would not necessarily be limited to, erosion control, sediment control, non-stormwater management, and materials management BMPs. These BMPs will be included in the SWPPP which is generally included as part of the construction documents and is utilized to minimize pollutant discharge during construction. With the implementation of site-specific BMPs included as part of the required erosion control plan, the Project would reduce or eliminate the discharge of potential pollutants from the stormwater runoff. In addition, the Applicant would be required to comply with City grading permit regulations, which require implementation of necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspection to reduce sedimentation and erosion. With compliance with these existing regulatory requirements that include

⁶³ California Department of Water Resources, Dam Breach Inundation Map Web Publisher, https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2, accessed July 15, 2022.

specific BMPs to address surface water quality, impacts during construction would be less than significant.

Potential pollutants generated by the Project during operation would include sediment, nutrients, pesticides, trash and debris, oil and grease, and metals typical of urban developments. However, the implementation of BMPs required by the City’s LID Ordinance would reduce the amount of these pollutants entering the stormwater. Additionally, since the existing Project Site does not have any structural or LID BMPs to treat or infiltrate stormwater, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. As such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans.

With respect to groundwater, as discussed above in Checklist Question X.b, the Project would not result in impacts related to groundwater recharge or interfere with sustainable groundwater management of the basin.

Therefore, with compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a. Would the project physically divide an established community?

Less than Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with four commercial buildings totaling 70,439 square feet and surface parking. The Project would replace the three existing buildings totaling 3,535 square feet and surface parking lot within the Project Site with a new commercial building comprised of office and retail uses. These uses would be consistent with the adjacent uses in the community. In addition, access to the adjacent streets and properties would be maintained throughout construction and operation. Furthermore, the Project does not propose a freeway or other large infrastructure that would divide the existing surrounding community. Therefore, the Project would not physically divide an established community. Impacts related to the physical division of an established community

would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project requires several discretionary approvals. While the Project would not be anticipated to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, the EIR will provide further analysis of the Project’s consistency with applicable land use plans, policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. No mineral extraction operations currently occur on the Project Site. The Project Site is located within an urbanized area and has been previously disturbed by development. As such, the potential for mineral resources to occur on-site is low. In addition, the Project Site is not located within a mineral producing area as classified by CGS.⁶⁴ The Project Site is also not located within a City-designated oil field or oil drilling area.⁶⁵ Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site, and, as such, no impact would occur. No further analysis of this topic in the EIR is required.

⁶⁴ California Geological Survey, Aggregate Sustainability in California, Fifty-Year Aggregate Demand Compared to Permitted Aggregate Reserves, 2018.

⁶⁵ City of Los Angeles Department of Public Works, Bureau of Engineering, NavigateLA, <http://navigate.lacity.org/navigate/>, accessed June 15, 2022.

b. Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. 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 Geological 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. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact. Noise sensitive uses near the Project Site include residences to the south. During construction activities associated with the Project, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate noise on a short-term basis. In addition, noise levels from on-site sources including, but not limited to, the parking garage and mechanical equipment may increase during operation of the Project. Furthermore, traffic attributable to the Project has the potential to increase noise levels along adjacent roadways. Therefore, further evaluation of this topic will be provided in the EIR.

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

Potentially Significant Impact. Construction of the Project could generate groundborne noise and vibration associated with demolition, site grading and excavation, other clearing activities, the installation of building footings, and construction truck travel. As such, the Project would have the potential to generate excessive groundborne vibration and noise levels during short-term construction activities. Therefore, further evaluation of this topic will be provided in the EIR, including an analysis of potential impacts to the historic Howard Hughes Headquarters Building located on the Project Site.

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

Less Than Significant Impact. The Project Site is not located within the vicinity of a private airstrip or within two miles of a public airport or public use airport. The nearest airport is the Hollywood-Burbank Airport located approximately 7 miles north of the Project Site. Therefore, the Project would not expose people residing or working in the Project area to excessive airport noise. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

XIV. POPULATION AND HOUSING

	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. The Project would include the construction of new office and retail uses. Since the Project does not propose a housing component, it would not directly induce a new residential population which would contribute to population growth in the vicinity of the Project Site or the Hollywood Community Plan area.

While construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be

anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project which could induce substantial population growth.

As previously discussed, the Project would include the development of 200,990 square feet of new uses within the Project Site consisting of 194,597 square feet of office uses and 6,393 square feet of retail uses. As part of the Project, three commercial buildings totaling 3,535 square feet, would be demolished to accommodate the Project. The existing 66,904 Howard Hughes building would remain with no change in use. Based on employee generation factors from LADOT, and conservatively assuming 100 percent of the retail uses would be restaurant uses, the Project is estimated to generate a net increase of 792 new employees on the Project Site.⁶⁶ Using employment data from the 2020–2045 RTP/SCS, an estimated 1,967,307 employees are projected within the City of Los Angeles in 2028, the Project's buildout year, with 49,586 new employees between 2023 and 2028. The Project's net increase in employees would represent 0.04 percent of the total number of employees in 2028 and 1.6 percent of the growth between 2023 and 2028. As noted above, the Project would not introduce new homes at the Project Site and would therefore not result in a direct population growth in the area, and the number of jobs would be consistent with SCAG's 2020–2045 RTP/SCS. While some of the new employment positions could be filled by persons who would relocate to the vicinity of the Project Site, this potential increase in population would not be substantial since not all employees would move close to the Project Site. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project Site and other persons would commute to the Project Site from other communities in and outside of the City. Therefore, given that the Project would not directly contribute to substantial 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 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 a highly developed area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth. Based on the above, the Project would not induce substantial population or housing growth. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is currently occupied by commercial uses, and no housing currently exists on the Project Site. The Project would not displace any existing people or housing. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

⁶⁶ Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.

XV. PUBLIC SERVICES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Potentially Significant Impact. LAFD provides fire protection and emergency medical services for the Project Site. The Project would increase the building square footage on-site and would introduce new commercial uses which could result in the need for additional fire protection services. Therefore, further analysis of this issue will be included in the EIR.

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

Potentially Significant Impact. Police protection for the Project Site is provided by the City of Los Angeles Police Department. The Project would introduce new commercial uses to the Project Site, which could result in the need for additional police services. Therefore, further analysis of this issue will be included in the EIR.

c. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental

impacts, in order to maintain acceptable service ratios or other performance objectives for schools?

Less Than Significant Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). LAUSD is divided into six local districts.⁶⁷ The Project Site is located in Local District–West.⁶⁸ As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of students within the service area of LAUSD from the introduction of a residential population. In addition, not all new employees of the Project would relocate to the vicinity of the Project Site, which could otherwise trigger a demand for new or expanded school facilities. Furthermore, even if there were new school facilities that would need to be built, pursuant to Government Code Section 65995, the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Therefore, impacts to schools would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

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

Less Than Significant Impact. Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. As shown in Table 2 on page 70, nearby parks and recreational facilities within an approximate 2-mile radius of the Project Site include: De Longpre Park (0.62 miles northeast of the Project Site); Selma Park (0.94 miles northeast of the Project Site); Dorothy & Benjamin Smith Park (1.7 miles north of the Project Site); Yucca Park (1.8 miles northeast of the Project Site); Pan Pacific Park (1.13 miles southwest of the Project Site); Runyon Canyon Park (1.23 miles north of the Project Site); Wattles Garden Park (1.35 miles northwest of the Project Site); Carlton Way Park (1.57 miles northeast of the Project Site); Seily Rodriguez Park (1.64 miles northeast of the Project Site); and Burns (Robert L.) Park (1.73 miles southeast of the Project Site).⁶⁹

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

⁶⁷ Los Angeles Unified School District, Local District Maps 2021-2022, <http://achieve.lausd.net/Page/8652>, accessed June 15, 2022.

⁶⁸ Los Angeles Unified School District, Local District—West Map, March 3, 2022.

⁶⁹ City of Los Angeles Department of Recreation and Parks, Facility Map Locator, <https://www.laparks.org/maplocator>, accessed June 15, 2022.

**Table 2
Parks and Recreational Facilities Within a 2-Mile Radius of the Project Site**

No.	Facility and Address	Distance from Project Site^a (miles)	Type of Park/ Recreational Facilities	Amenities
1	Poinsettia Recreation Center 7341 Willoughby Avenue Los Angeles, CA 90046	0.50	Recreation Center	Sports Facilities, Children's Play Area, Stage
2	De Longpre Park 1350 N. Cherokee Ave. Los Angeles, CA 90028	0.62	Park	Children's Play Area, Benches
3	Selma Park 6567 Selma Avenue Los Angeles, CA 90028	0.94	Park	Children's Play Area, Benches, Outdoor Tables
4	Hollywood Recreation Center 1122 Cole Avenue Los Angeles, CA 90038	1.00	Recreation Center	Sports Facilities, Children's Play Area, Auditorium, Community Room
5	Dorothy & Benjamin Smith Park 7020 Franklin Ave Los Angeles, CA 90028	1.07	Park	Benches, Sitting Area
6	Yucca Park 6671 Yucca St Hollywood, CA 90028	1.08	Park/ Recreation Center	Basketball Courts (lighted/outdoor), Children's Play Area, Picnic Tables, Soccer Field (unlighted), Benches, Synthetic Field, Computer Lab (B-top site).
7	Pan Pacific Park Recreation Center 7600 Beverly Boulevard Los Angeles, CA 90036	1.13	Park/ Recreation Center	Barbecue Pits, Baseball Diamond (Lighted), Basketball Courts (Lighted/Indoor), Children's Play Area, Picnic Tables, Restroom(s), Amphitheatre, Jogging Path, Kitchen, Multipurpose Sports Field, Outdoor Fitness Equipment, Stage, Basketball Courts (Unlighted/Outdoor)
8	Runyon Canyon Park 2000 N. Fuller Ave Los Angeles, CA 90046	1.23	Park/Hiking Trail	Urban wilderness, Vista point, Picnic Area, Water Fountain, Trail
9	Wattles Garden Park 1850 North Curson Above Hollywood, CA 90046	1.35	Park/Hiking Trail	Community Garden, Hiking Trail
10	Carlton Way Park 5927 Carlton Way Los Angeles, CA 90028	1.57	Park	Children's Play Area, Outdoor Fitness Equipment
11	Seily Rodriguez Park 5707 Lexington Ave Hollywood, CA 90038	1.64	Park	Basketball Courts (Lighted/Outdoor), Children's Play Area, Picnic Tables, Benches

**Table 2 (Continued)
Parks and Recreational Facilities Within a 2-Mile Radius of the Project Site**

No.	Facility and Address	Distance from Project Site ^a (miles)	Type of Park/ Recreational Facilities	Amenities
12	Burns (Robert L.) Park 4900 Beverly Boulevard Los Angeles, CA 90004	1.73	Park	Children's Play Area, Picnic Tables
<p>^a Distances are approximate aerial/bird's eye view distances from the Project Site obtained from the City of Los Angeles, Department of Recreation and Park Facility Locator.</p> <p>Source: City of Los Angeles, Department of Recreation and Parks Facility Locator, www.laparks.org/maplocator?cat_id=45&geo[radius]=2&geo[latitude]=34.0886262&geo[longitude]=-118.3421571&address=7000%20Romaine%20St,%20Los%20Angeles,%20CA%2090038,%20USA, accessed January 27, 2023.</p>				

anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks. In addition, Project employees would be more likely to use parks near their homes during non-work hours. Furthermore, the Project proposes on-site amenities such as a fitness center for employees and outdoor terraces, reducing the likelihood employees would use local parks. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks or the need for new or physically altered parks. Impacts would be less than significant, and no mitigation measures are required. No further analysis of the issue in an EIR is required.

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

Less Than Significant Impact. Other public facilities available include libraries. The Los Angeles Public Library (LAPL) provides library services to the City through its Central Library, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through web-based resources.⁷⁰ The Project area is served by existing libraries within the Hollywood Community Plan area, including the John C. Fremont Branch Library, located 0.6 miles southeast of the Project Site.⁷¹

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

⁷⁰ Los Angeles Public Library, Los Angeles Public Library Strategic Plan 2015–2020.

⁷¹ Los Angeles Public Library, Locations and Hours, www.lapl.org/branches?distance%5Bpostal_code%5D=90038&distance%5Bsearch_distance%5D=2&distance%5Bsearch_units%5D=mile&field_branch_resources_services_tid=All, accessed June 15, 2022.

residents within the service population of the John C. Fremont Branch Library. 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. Given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library services. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities or the need for new or physically altered library facilities. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this issue in an EIR is required.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. Would the project Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

Less Than Significant Impact. The Project does not propose the development of residential uses which would create a demand on nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create a demand for parks and recreational facilities. While it is possible that some of these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks and recreational facilities. The Project proposes on-site amenities such as a fitness center and outdoor terraces, reducing the likelihood employees would use local parks or recreational facilities. In addition, Project employees would be more likely to use parks and recreational facilities near their homes during non-work hours. Therefore, the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. The impact on parks and recreational facilities would be less

than significant, and mitigation measures would not be required. No further evaluation of this topic in an EIR is required.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The Project does not include any residential uses and therefore would not result in any direct substantial population growth that would increase use of existing recreational facilities. Additionally, while the Project includes on-site amenities for employee use, these would not be open to the public. Therefore, the Project would not necessitate construction of new recreational facilities. Therefore, no impact would occur, and no mitigation measures would be required. No further evaluation of this topic in an EIR is required.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Potentially Significant Impact. Operation of the proposed uses would generate vehicle and transit trips throughout the day. The resulting increase in the use of the area’s roadways could conflict with an applicable plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Therefore, further analysis of this issue will be provided in the EIR.

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

Potentially Significant Impact. SB 743, which went into effect in January 2014, requires the Governor’s Office of Planning and Research to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis has shifted from driver delay, which is typically measured by traffic level of service (LOS), to a new

measurement that better addresses the State's goals on reduction of greenhouse gas emissions, creation of a multi-modal transportation, and promotion of mixed-use developments. CEQA Guidelines Section 15064.3 states that vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts, replacing LOS.

On July 30, 2019, the City adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its *Transportation Assessment Guidelines* (July 2019), which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743. The *Transportation Assessment Guidelines* were updated in July 2020.

The Project would develop new commercial uses on the Project Site. As a result, VMT would increase over existing conditions. Therefore, further analysis of this issue will be provided in the EIR.

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. The Project Site is located in a highly urbanized area developed with roadways and infrastructure. All access and circulation associated with the Project would be designed and constructed in conformance with all applicable requirements established by LADBS, LAFD, and the LAMC. The Project would not include any new roads that would result in an increase in hazards due to a design feature. As noted above, access to the Project's parking garage and loading/trash areas would be provided via two driveways on Orange Avenue. Overall, the number of curb cuts on the Project Site would be reduced by one with the elimination of one curb cut on N. Sycamore Avenue which is currently used for access to the surface parking lot. In addition, the Project would not result in incompatible uses as the proposed uses are consistent with the types of commercial uses already present in the surrounding area. Thus, impacts related to increased hazards due to a geometric design feature or incompatible use would be less than significant, and no further analysis of this topic in the EIR is required.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. As discussed above, the nearest emergency/disaster routes to the Project Site are La Brea Avenue 0.07 miles west of the Project Site and Santa Monica Boulevard 0.12 mile north of the Project Site.⁷² While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, both directions of travel would continue to be maintained in accordance with standard construction traffic management plans that would be implemented to ensure adequate circulation and emergency access. With regard to

⁷² City of Los Angeles, Geohub, Disaster Routes, <https://geohub.lacity.org/datasets/lacounty::disaster-routes-1/explore?location=34.087865%2C-118.341791%2C17.00>, accessed June 21, 2022.

operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety. Therefore, the Project would not result in inadequate emergency access. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XVIII. TRIBAL CULTURAL RESOURCES

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|--------------------------|
| a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. A resource determined by the Lead Agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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

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

Potentially Significant Impact (a and b). Approved by Governor Jerry Brown on September 25, 2014, AB 52 establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in PRC Section 21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the Lead Agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the Lead Agency must begin the consultation process within 30 days of receiving the request for consultation.

As noted above, the Project would require grading, excavation, and other construction activities that could have the potential to disturb existing but undiscovered tribal cultural resources. Therefore, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with AB 52, the City will notify all applicable tribes, and the City will participate in any requested consultations for the Project. Further analysis of this topic will be provided in the EIR.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The wastewater analysis below is based, in part, on the *Romaine and Sycamore Utility Infrastructure Technical Memorandum: Wastewater* (Wastewater Report) prepared for the Project by KPFF Consulting Engineers, dated October 2022, and included as Appendix IS-6 of this Initial Study.

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

Potentially Significant Impact (Water, Electric Power, and Natural Gas)/Less Than Significant Impact (Wastewater, Stormwater, and Telecommunications Facilities). Water, wastewater, electric power, and natural gas systems consist of two components, the source of the supply or place of treatment (for wastewater), and the conveyance systems (i.e., distribution lines and mains) that link the location of these facilities to an individual development site. Given the Project's increase in the amount of developed floor area on the Project Site and the potential corresponding increase in water, electricity, and natural gas demand, further analysis of this issue in an EIR will be provided. Wastewater and telecommunications facilities are analyzed below. Stormwater is analyzed under Section X, Hydrology and Water Quality, above.

Wastewater

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Water Reclamation Plant (HWRP). The HWRP has a capacity of 450 million gallons per day (mgd),⁷³ and current average wastewater flows are at approximately 275 mgd.⁷⁴ Accordingly, the remaining available capacity at the HWRP is approximately 175 mgd. As shown in Table 3 on page 78, the Project would generate a net increase in wastewater flow from the Project Site of approximately 34,395 gallons per day (gpd), or approximately 0.03 mgd.⁷⁵ The Project's increase in average daily wastewater flow of 0.04 mgd would represent approximately 0.02 percent of the current estimated 175 mgd of remaining available capacity at the HWRP. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the HWRP. Furthermore, wastewater flows would be typical of office and commercial developments which are currently treated by HWRP and no industrial discharge into the wastewater system would occur. Furthermore, discharge of effluent from the HWRP into Santa Monica Bay is also regulated by permits issued under the NPDES and is required to meet Los Angeles Regional Water Quality Control Board (LARWQCB) requirements. As LA Sanitation (LASAN) monitors the treated wastewater, and because the wastewater generated by the Project would be similar to wastewater currently treated at HWRP, wastewater generated from the Project Site would not exceed wastewater treatment requirements of LARWQCB.

⁷³ LASAN, Water Reclamation Plants, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=vm8qwyj80_4&_afLoop=18606279438697733#!, accessed July 13, 2022.

⁷⁴ LASAN, Water Reclamation Plants, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=vm8qwyj80_4&_afLoop=18606279438697733#!, accessed July 13, 2022.

⁷⁵ Although generally analyzed as office uses throughout this Initial Study, the Project's amenities for employees are broken out for purposes of wastewater because they generate more daily demand than office uses.

**Table 3
Estimated Project Wastewater Generation**

Land Use	Floor Area	Wastewater Generation Rate (gpd/unit) ^a	Wastewater Generation (gpd)
EXISTING TO BE REMOVED			
Office	2,918 sf	0.12 gpd/sf	350
Storage	617 sf	0.03 gpd/sf	19
<i>Existing to be Removed Subtotal</i>			369
PROPOSED			
Office ^b	186,197 sf	0.12 gpd/sf	22,344
Retail/Restaurant: Full-Service Indoor Seat (6,393 square feet) ^c	320 seats	30 gpd/seat	9,600
Fitness Center	3,000 sf	0.65 gpd/sf	2,600
Lounge	1,200 sf	0.05 gpd/sf	60
Lobby	3,200 sf	0.05 gpd/sf	160
Proposed Wastewater Generation			34,764
<i>Less Existing to Be Removed</i>			<i>(369)</i>
Net Additional Wastewater Generation (Proposed – Existing to Be Removed)			34,395
<p>_____</p> <p><i>sf = square feet</i> <i>gpd = gallons per day</i></p> <p>^a <i>Wastewater generation rates are based on 2012 LASAN Sewer Generation Rates.</i></p> <p>^b <i>Although generally analyzed as office uses throughout this Initial Study, the Project's amenities for employees are broken out for purposes of wastewater because they generate more daily demand than office uses.</i></p> <p>^c <i>Conservatively assumes 100% of the proposed retail uses would be restaurant and 1 seat = 20 square feet.</i></p> <p><i>Source: Eyestone Environmental, 2023.</i></p>			

The Project is anticipated to utilize existing sewer infrastructure. In the vicinity of the Project Site, there is an 8-inch vitrified clay pipe (VCP) in Romaine Street; an 8-inch VCP in North Sycamore Avenue, and 10-inch and 18-inch VCPs in North Orange Drive. The 8-inch sewer line in Romaine Street has a capacity of 0.70968 cfs or 458,678 gpd, the 8-inch sewer line in North Sycamore Avenue has a capacity of 1.20854 cfs or 781,100 gpd, the 10-inch sewer line in North Orange Drive has a capacity of 1.28673 cfs or 831,635 gpd, and the 18-inch sewer line in North Orange Drive has a capacity of 9.75402 cfs or 6,304,188 gpd. As stated above, and confirmed by LASAN in its WWSI dated July 19, 2022 (included as part of Appendix IS-6 of this Initial Study), the Project's net increase in wastewater generation is approximately 34,395 gpd. This would represent approximately 7.7 percent of the 8-inch sewer line in Romaine Street's capacity, 4.5 percent of the 8-inch sewer line in North Sycamore Avenue's capacity, 4.3 percent of the 10-inch sewer line in North Orange Drive's capacity, and 0.6 percent of the 18-inch sewer line in North Orange Drive's capacity. As such, LASAN stated in its WWSI that the sewer system might be able to accommodate the flow from the Project. As required by LAMC Section 64.15, the Project would submit a Sewer Capacity Availability

Request to LASAN to evaluate the capability of the existing wastewater system and obtain approval to discharge the Project's wastewater to the existing sewer lines surrounding the Project Site. Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for the Project during the Project's permitting process. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Therefore, the Project would not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained.

Based on the above, the Project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Therefore, impacts would be less than significant, and mitigation measures are not required. No further analysis of this topic in an EIR is required.

Stormwater

As discussed above in Response to Checklist Question X.c.ii, the Project would not alter stormwater flow rates. As such, the Project would not require or result in the relocation or construction of new or expanded stormwater drainage. Based on the above, the Project would not require or result in the construction of new stormwater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Therefore, impacts would be less than significant, and mitigation measures are not required. No further analysis of this topic in an EIR is required.

Telecommunications Facilities

The Project would require construction of new on-site telecommunications infrastructure to serve new buildings and potential upgrades and/or relocation of existing telecommunications infrastructure. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. However, the Project would ensure vehicle and pedestrian access is maintained throughout construction. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration (i.e., months) and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers and the City as applicable. As such, the Project would not require or result in the relocation or construction of new or expanded telecommunications facilities. Impacts would be less than significant and no further evaluation of this topic in an EIR is required.

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

Potentially Significant Impact. LADWP supplies water to the Project Site. Given the Project's increase in the amount of developed floor area on the Project Site, the Project has the potential to

result in increased demand for water provided by LADWP. Therefore, further analysis of this issue will be provided in the EIR.

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As shown in Table 3 on page 78, the Project would generate a net increase in wastewater flow from the Project Site of approximately 34,395 gpd, or approximately 0.03 mgd. The Project's increase in average daily wastewater flow of 0.03 mgd would represent approximately 0.02 percent of the current 175 mgd of remaining available capacity of the HWRP.⁷⁶ Therefore, wastewater generated by the Project would be accommodated by the existing capacity of the HWRP.

Various factors, including future development of new treatment plants, upgrades and improvements to existing treatment capacity, development of new technologies, etc., will ultimately determine the available capacity of the Hyperion Service Area in 2028, the operational year of the Project. Planned upgrades would provide for improvements beyond 2040 to serve future population needs. However, it is conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to 2028. Thus, based on this conservative assumption, the capacity of the HWRP in 2028 would continue to be 450 mgd.

Based on LASAN's average flow projections for the HWRP, it is anticipated that average flows in 2028, the Project build-out year, would be approximately 271.2 mgd.⁷⁷ Accordingly, the future remaining available capacity in 2028 would be approximately 178.8 mgd.⁷⁸ The Project's increase in average daily wastewater flow of 0.03 mgd would represent approximately 0.02 percent of the estimated future remaining available capacity of 178.8 mgd at the HWRP.⁷⁹ Therefore, wastewater generated under the Project would be accommodated by the future capacity of the HWRP.

Additionally, the Project's net increase in average daily wastewater generation of 0.03 mgd plus the current average flows of approximately 275 mgd to the HWRP would represent approximately 61.1 percent⁸⁰ of the HWRP's capacity of 450 mgd. With regard to future flows, the Project's net increase of 0.03 mgd plus the projected flows of approximately 271.2 mgd to the HWRP would also represent approximately 60.3 percent⁸¹ of the HWRP's assumed future capacity of 450 mgd.

⁷⁶ $(0.03 \text{ mgd} / 175 \text{ mgd}) \times 100 = 0.02\%$

⁷⁷ Los Angeles Department of Water and Power, One Water LA 2040 Plan—Volume 2, Table ES.1, Projected Wastewater Flows. Based on a straight-line interpolation of the projected flows for the Hyperion Water Reclamation Plant for 2020 (approximately 256 mgd) and 2030 (approximately 275 mgd). The 2028 value is extrapolated from 2020 and 2030 values: $[(275 \text{ mgd} - 256 \text{ mgd}) \div 10] \times 8 + 256 = \sim 271.2 \text{ mgd}$.

⁷⁸ $450 \text{ mgd} - 271.2 \text{ mgd} = 178.8 \text{ mgd}$

⁷⁹ $(0.03 \text{ mgd} \div 178.8 \text{ mgd}) \times 100 = 0.02\%$

⁸⁰ $[(0.03 \text{ mgd} + 275 \text{ mgd}) \div 450 \text{ mgd}] \times 100 = 61.12 (\sim 61.1\%)$

⁸¹ $[(0.03 \text{ mgd} + 271.2 \text{ mgd}) \div 450 \text{ mgd}] \times 100 = \sim 60.3$.

Based on the above, there is adequate treatment capacity to serve the Project's projected demand in addition to existing LASAN commitments. As such, the Project would result in a determination by the wastewater treatment provider, which serves or may serve the Project, that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. Impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. While the Bureau of Sanitation generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County of Los Angeles (County) are categorized as either Class III or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in inert waste landfills.⁸² Nine Class III landfills and one inert waste landfill with solid waste facility permits are currently serving the County.⁸³ In addition, there is one solid waste transformation facility within the County that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery.

Based on 2019 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the most recent report available, the total remaining permitted Class III landfill capacity in the County is estimated at 148.4 million tons. The permitted inert waste landfill serving the County is Azusa Land Reclamation. This facility currently has 58.84 million tons of remaining capacity and an average daily in-County disposal rate of 854 tons per day.⁸⁴ The County continually evaluates landfill disposal needs and capacity through preparation of the CoIWMP Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.⁸⁵

Additionally, the City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan sets a goal of becoming a "zero waste" city by 2030. To this end, the City implements a number of source reduction and recycling programs such as curbside recycling,

⁸² Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

⁸³ County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020. The 9 Class III landfills serving the County include the Antelope Valley Landfill, the Burbank Landfill, the Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, Savage Canyon Landfill, the Scholl Canyon Landfill, and the Sunshine Canyon City and County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

⁸⁴ County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.

⁸⁵ County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.

home composting demonstration programs, and construction and demolition debris recycling.⁸⁶ The City is currently diverting 76 percent of its waste from landfills.⁸⁷ The City has adopted the goal of achieving 90 percent diversion by 2025, and zero waste by 2030.

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

Construction

As previously discussed, construction of the Project would include the removal of three commercial buildings totaling 3,535 square feet and construction of 200,990 square feet of new office and retail uses. Pursuant to the requirements of SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within the County and within the Class III landfills open to the City. Furthermore, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project's 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. Thus, although the total diversion rate may ultimately exceed 75 percent, this analysis conservatively assumes a diversion rate of 75 percent.

As shown in Table 4 on page 83, based on construction and debris rates established by the USEPA and after accounting for mandatory recycling, the Project would generate approximately 166 tons of construction-related waste. It should be noted that soil export is not typically included in the calculation of construction waste to be landfilled since soil is not disposed of as waste but, rather, is typically used as a cover material or fill at other construction sites requiring soils import. Given the remaining permitted capacity at the Azusa Land Reclamation facility, which is approximately 58.84 million tons, as well as the remaining 148.4 million tons of capacity at the Class III landfills serving the County, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

Based on the above, Project construction would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, construction impacts to solid waste facilities would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

⁸⁶ LA Sanitation, Solid Waste Integrated Resource Plan FAQ; www.zerowaste.lacity.org/files/info/fact_sheet/SWIRP_FAQS.pdf, accessed July 29, 2020.

⁸⁷ LA Sanitation, Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=alxbkb91s_4&_afLoop=18850686489149411#!, accessed July 13, 2022.

**Table 4
Project Demolition and Construction Waste Generation**

Building	Size	Generation Rate (lbs/square feet) ^a	Total (tons)
Construction Waste			
Office	194,597 sf	3.89	379
Retail	6,393 sf	3.89	12
<i>Construction Waste Subtotal</i>			<i>391</i>
Demolition Waste			
Commercial	3,535 sf	155	274
<i>Demolition Waste Subtotal</i>			<i>274</i>
Total for Construction and Demolition Waste			665
Total After 75-Percent Recycling			166
<hr/> <i>lbs = pounds</i> <i>sf = square feet</i> ^a <i>United States Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Tables 3, 4 5, and 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types.</i> <i>Source: Eyestone Environmental, 2023.</i>			

Operation

As shown in Table 5 on page 84, upon full buildout, the Project would result in a net increase in solid waste generation of approximately 1,522 tons per year. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures, such as compliance with AB 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City’s Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.⁸⁸

The estimated net increase in solid waste that would be generated by the Project represents approximately 0.001 percent of the remaining capacity (148.4 million tons) for the Class III landfills serving the County.⁸⁹

⁸⁸ LASAN, Solid Waste Integrated Resources Plan, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s-lsh-wwd-s-zwswirp?_afLoop=3608041245788654&_afWindowMode=0&_afWindowId=null&_adf.ctrl-state=8vrc5bges_179#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D3608041245788654%26_afWindowMode%3D0%26_adf.ctrl-state%3D8vrc5bges_183, accessed March 9, 2021.

⁸⁹ (1,522 tons per year/148.4 million tons) x 100 ≈ 0.001%

**Table 5
Estimated Project Solid Waste Generation**

Building	Size	Employee Generation Rate per thousand square feet^a	Estimated Number of Employees^a	Solid Waste Generation Rate^b	Total Generation (tons/year)
Existing to be Removed					
Office	2,918 sf	4	11 emp	10.53 lbs/emp/day	21
Warehouse	617 sf	0.33	1 emp	8.93 lbs/emp/day	2
Total Existing to be Removed					23
Proposed					
Office	194,597 sf	4	778 emp	10.53 lbs/emp/day	1,495
Retail/Restaurant	6,393 sf	4 ^c	26 emp	10.53 lbs/emp/day	50
Total Proposed					1,545
Total Net Increase					1,522
<hr/> <i>emp = employees</i> <i>lbs = pounds</i> <i>sf = square feet</i> ^a Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. ^b Solid waste generation rates are from the City's L.A. City CEQA Thresholds Guide. The L.A. CEQA Thresholds Guide does not include a generation factor for office uses, so the commercial rate was used. ^c Conservatively assumes 100% of the retail uses would be restaurant. Source: Eyestone Environmental, 2023.					

The County will continue to address landfill capacity through the preparation of CoIWMP annual reports. The preparation of each annual report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Solid waste disposal is an essential public service that must be provided without interruption in order to protect public health and safety, as well as the environment. Jurisdictions in the County continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning directives. These efforts, together with countywide and regional programs implemented by the County and the cities, acting in concert or independently, have achieved significant, measurable results, as documented in the 2019 Annual Report. As discussed below, the Project would be consistent with and would further City policies that reduce landfill waste streams. Such policies and programs serve to implement the strategies outlined in the 2019 Annual Report to adequately meet countywide disposal needs through 2034 without capacity shortages.

Based on the above, 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. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

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

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in “zero waste” by 2030. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste⁹⁰ on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.⁹¹ The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

⁹⁰ Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

⁹¹ Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

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

c. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact (a-d). As discussed above, the Project Site is located in an urbanized area, and 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 Fire District No. 1, which consists of areas identified by the City that are required to meet additional development regulations to reduce fire

hazard-related risks.⁹² Therefore, the Project Site is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones. No impacts regarding wildfire risks would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

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

⁹² City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 948 N. Sycamore Avenue, June 2, 2022.

As discussed above, the Project's potential environmental impacts for the following subject areas will be further analyzed in the EIR: air quality; cultural resources; energy; geology and soils (paleontological resources); greenhouse gas emissions; land use and planning; noise; public services (fire and police protection); transportation; tribal cultural resources; and utilities and infrastructure (water supply and energy infrastructure).

b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Potentially Significant Impact. The potential for cumulative impacts occurs when the impacts of the Project are combined with impacts from related development projects and result in impacts that are greater than the impacts of the Project alone. Located in the vicinity of the Project Site are other current and reasonably foreseeable projects, the development of which, in conjunction with that of the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in the EIR for the following subject areas: air quality; cultural resources; energy; geology and soils (paleontological resources); greenhouse gas emissions; land use and planning; noise; public services (fire and police protection); transportation; tribal cultural resources; and utilities and infrastructure (water supply and energy infrastructure).

With regard to agriculture and forestry resources, biological resources, and mineral resources, no such resources are located on the Project Site or in the surrounding area. In addition, the Project would have no impact on these resources, and therefore could not combine with other projects to result in cumulative impacts. Therefore, cumulative impacts to agriculture and forestry resources, biological resources, and mineral resources would be less than significant.

As analyzed above, with the exception of paleontological resources which will be analyzed in the EIR, the Project would not result in significant impacts to geology and soils. Thus, the Project would not contribute to any cumulative impacts associated with geology and soils. In addition, due to their site-specific nature, geology and soils impacts are typically assessed on a project-by-project basis or for a particular localized area. Therefore, as with the Project, related projects would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. While cumulative development would expose a greater number of people to seismic hazards, as with the Project, related projects would be subject to local, State, and federal regulations and standards for seismic safety. Thus, Project impacts related to geology and soils would not be cumulatively considerable and would be less than significant.

Due to their site-specific nature, hazards and hazardous materials impacts are typically assessed on a project-by-project basis. Therefore, as with the Project, related projects would address site-specific hazards through the implementation of site-specific recommendations and/or mitigation measures. In addition, as with the Project, all related development located in the vicinity of the Project Site would be subject to local, regional, State, and federal regulations pertaining to hazards and hazardous materials. Therefore, with adherence to such regulations, the Project and related projects would not result in significant cumulative impacts with regard to hazards and hazardous materials. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

Related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, as with the Project, related projects would be subject to the City's LID requirements and, for applicable projects, NPDES permit requirements, including development of SWPPPs for construction projects greater than one acre, compliance with SUSMP requirements during operation, and compliance with other local requirements pertaining to hydrology and surface water quality. It is anticipated that related projects would also be evaluated on an individual basis by the Department of Public Works to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to hydrology and water quality. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

In terms of population and housing, related development would not induce substantial population growth since most of the City is already fully developed and occupied by a long-standing residential population. In addition, not all related projects include residential uses and therefore would not contribute to population growth. As discussed in the analysis above, the Project does not propose residential uses and thus would not directly contribute to population growth. While the Project would not displace housing or people, other projects might displace existing housing and people residing in them. However, even if construction of replacement housing were required elsewhere, such developments would likely occur on infill sites within the City, and the appropriate level of environmental review would be conducted to analyze the extent to which the related projects could cause significant environmental impacts. Overall, the Project's contribution would not be cumulatively considerable since no residential units are proposed, and cumulative impacts related to population and housing would be less than significant.

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

With respect to wastewater, since the HWRP is in compliance with the State's wastewater treatment requirements, and the wastewater generated by the related projects would be typical of urban uses, no industrial discharges into the wastewater system would occur that would exceed the wastewater treatment requirements of the LARWQCB. Additionally, as discussed above, the HWRP currently treats 275 mgd of wastewater and has remaining capacity for 175 mgd. Consequently, there would be no need to construct new or expand wastewater treatment facilities, the construction of which could cause significant environmental effects. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to the wastewater treatment systems. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to stormwater infrastructure, as with the Project, related projects would be required to comply with the requirements of the City's LID Ordinance. In accordance with the City's LID Ordinance, related projects would also implement BMPs to capture a specified amount of runoff within the Project Site and reduce the potential impact of increased runoff to existing drainage systems. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to stormwater infrastructure. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

Development of the Project and related projects could require new or expanded telecommunications infrastructure. As with the Project, the installation of any required telecommunications infrastructure associated with the related projects would occur during a relatively short duration and would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to telecommunication infrastructure. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

The Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction periods. However, given the 148.4 million tons of capacity at the Class III landfills serving the County and urbanized and built-out nature of most of the City, the related projects would similarly represent a minor percentage of the remaining capacity of the County's Class III landfills serving the County. Additionally, the demand for landfill capacity is continually evaluated by the County through preparation of the CoIWMP annual reports. Each annual CoIWMP report assesses future landfill disposal needs over a 15 year planning horizon. Based on the 2019 CoIWMP Annual Report, the County anticipates that future disposal needs can be adequately met for the next 15 years (i.e., 2034) with implementation of strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transformation and processing infrastructure, and use out of county disposal, including waste by rail. The preparation of each annual CoIWMP provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Furthermore, in future years, it is anticipated that the rate of declining landfill capacity would slow considering the City's goal to achieve zero waste by 2030. Therefore, cumulative impacts with respect to solid waste would be less than significant.

As discussed above, the Project Site is located in an urbanized area, and there are no wildlands located in the vicinity of the Project Site. Therefore, the Project would not contribute to an increased wildfire risk. Moreover, the Project and related projects would be developed in accordance with LAMC requirements pertaining to fire safety. Specifically, Section 57.106.5.2 of the LAMC provides

that the Fire Chief shall have the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; Section 57.118 of the LAMC establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects; and Section 57.507.3.1 establishes fire water flow standards. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to wildfire. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

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

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