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

INITIAL STUDY

6311 Romaine Project

Case Number: ENV-2022-7064-EIR

Project Location: 6400–6416 West Santa Monica Boulevard, 901–1045 North Cahuenga Boulevard, 6113 West Willoughby Avenue, 6300 and 6311 West Romaine Street, and 906–1048 North Cole Avenue, Los Angeles, California 90038

Community Plan Area: Hollywood

Council District: 13—Soto-Martinez

Project Description: The 6311 Romaine Project (Project) proposes a mixed-use entertainment studio campus on an approximately 6.4-acre site (Project Site) within the Hollywood Community Plan area of the City of Los Angeles (City), and comprising the majority of two consecutive blocks bisected by Romaine Street into the North and South Block, and is bounded by Cahuenga Boulevard to the east and Cole Avenue to the west. The Project would construct 452,747 square feet of new soundstage buildings, production, office, retail, and restaurant uses, and would renovate 108,197 square feet of existing production, office, and gymnasium uses, including the former Technicolor Motion Picture Corporation which is designated as Los Angeles Historic-Cultural Monument LA-1289, into office and production uses. On the North Block, the Project proposes to develop a total floor area of 282,591 square feet, consisting of six existing structures to be renovated, one rooftop structure addition to the existing Building 4, one new seven-story office building, and a one-level subterranean garage and surface parking areas. On the South Block, the Project proposes to construct a total floor area of 278,353 square feet, consisting of two soundstage buildings, with each soundstage building containing two production studios, two new office buildings, and a two-level subterranean garage. Upon completion, the Project would result in a total floor area of 560,944 square feet, for a project floor area ratio (FAR) of approximately 2:1, with a maximum building height of seven stories, or 103 feet. A total of 81,646 square feet of floor area of existing office, industrial, retail, and dance studio uses, and a six-level above-ground parking structure and surface parking areas would be demolished.

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

PREPARED BY:
Eyestone Environmental, LLC

APPLICANT:
Romaine Street Owner, LLC

January 2024

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1 INTRODUCTION

An application for the proposed 6311 Romaine Project (Project) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles, as Lead Agency, has determined that the proposed 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 proposed Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City has determined to use Appendix G of the State CEQA Guidelines as the thresholds of significance for the Project unless another threshold of significance is expressly identified in the document. Based on the analysis provided within this Initial Study, the City has concluded that the Project may result in significant impacts on the environment and the preparation of an Environmental Impact Report (EIR) is required. This Initial Study (as part of the forthcoming EIR) are intended as informational documents, which are ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE OF AN INITIAL STUDY

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

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration nor Mitigated Negative Declaration is appropriate, an EIR is normally required.[1]

[1] State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the Lead Agency when there is substantial evidence that the project may cause a significant effect on the environment: "(A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C)
(Footnote continued on next page)

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.

1.3.1 Initial Study

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

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

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.

1.3.2 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 generally circulated for a 45-day review and comment period. The purpose of this review and comment period is to provide public agencies and the general public an opportunity to review the Draft EIR and comment on the document, including the analysis of environmental effects, the mitigation measures presented to reduce potentially significant impacts, and the alternatives analysis. After the close of the 45-day review and comment period, responses to comments on environmental issues received during the comment period are prepared.

1.3.3 Final EIR

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

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

2 EXECUTIVE SUMMARY

PROJECT TITLE	**6311 Romaine Project**
ENVIRONMENTAL CASE NO.	ENV-2022-7064-EIR
RELATED CASES	CPC-2022-7063-ZC-HD-CU-MCUP-SPP-SPR; VTT-83971

PROJECT LOCATION	6400–6416 West Santa Monica Boulevard, 901–1045 North Cahuenga Boulevard, 6113 West Willoughby Avenue, 6300 and 6311 West Romaine Street, and 906–1048 North Cole Avenue, Los Angeles, California 90038
COMMUNITY PLAN AREA	Hollywood
GENERAL PLAN DESIGNATION	Limited Manufacturing
ZONING	MR1-1-SN
COUNCIL DISTRICT	13 –Soto-Martinez

LEAD AGENCY	**City of Los Angeles**
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	**Tamar Gharibian**
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APPLICANT	**ROMAINE STREET OWNER, LLC**
ADDRESS	1015 N. Fairfax Avenue, West Hollywood, CA 90046
PHONE NUMBER	(323) 461-8815

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

Tamar Gharibian	January 17, 2024
PRINTED NAME, TITLE	**DATE**

EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

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

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

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

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

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

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

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

9) The explanation of each issue should identify:

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

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

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The 6311 Romaine Project (Project) proposes a mixed-use entertainment studio campus on an approximately 6.4-acre site (Project Site) within the Hollywood Community Plan area of the City of Los Angeles (City),[2] and comprising the majority of two consecutive blocks bisected by Romaine Street into the North and South Block, and is bounded by Cahuenga Boulevard to the east and Cole Avenue to the west. The Project would construct 452,747 square feet of new soundstage buildings, production, office, retail, and restaurant uses, and would renovate 108,197 square feet of existing production, office, and gymnasium uses, including the former Technicolor Motion Picture Corporation which is designated as Los Angeles Historic-Cultural Monument LA-1289, into office and production uses. On the North Block, the Project proposes to develop a total floor area of 282,591 square feet, consisting of six existing structures to be renovated, one rooftop structure addition to the existing Building 4, one new seven-story office building, and a one-level subterranean garage and surface parking areas. On the South Block, the Project proposes to construct a total floor area of 278,353 square feet, consisting of two soundstage buildings, with each soundstage building containing two production studios, two new office buildings, and a two-level subterranean garage. Upon completion, the Project would result in a total floor area of 560,944 square feet, for a project floor area ratio (FAR) of approximately 2:1, with a maximum building height of seven stories, or 103 feet. A total of 81,646 square feet of floor area of existing office, industrial, retail, and dance studio uses, and a six-level above-ground parking structure and surface parking areas would be demolished.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located at 6400–6416 West Santa Monica Boulevard; 901–1045 North Cahuenga Boulevard; 6113 West Willoughby Avenue; 6300 and 6311 West Romaine Street; 906–1048 North Cole Avenue within the Hollywood Community Plan area of the City. As shown in Figure 1, Project Location Map, on page 8, the Project Site consists of the majority of two City blocks and is bounded by Santa Monica Boulevard to the north, Cahuenga Boulevard to the east, Willoughby Avenue to the south, and Cole Avenue to the west. The Project Site is bisected by Romaine Street, bifurcating the Project Site into the North Block and South Block.

Local access to the Project Site is provided by Santa Monica Boulevard located north of the Project Site, Romaine Street located in between the North Block and the South Block, Cahuenga Boulevard located east of the Project Site, Willoughby Avenue located south of the Project Site, and Cole Avenue located west of the Project Site. Primary regional access to the Project Site is provided by the Hollywood Freeway (US-101), which is located approximately one mile from the Project Site. The

[2] The City is currently in the process of updating the Hollywood Community Plan. The most recent draft was released in February 2021 and is available at https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update#the-plan. The City Planning Commission recommended approval of the draft Plan on March 18, 2021, the Department of City Planning released the letter of determination on August 18, 2021, and the draft plan is currently awaiting consideration by the City's Planning and Land Use Management committee.

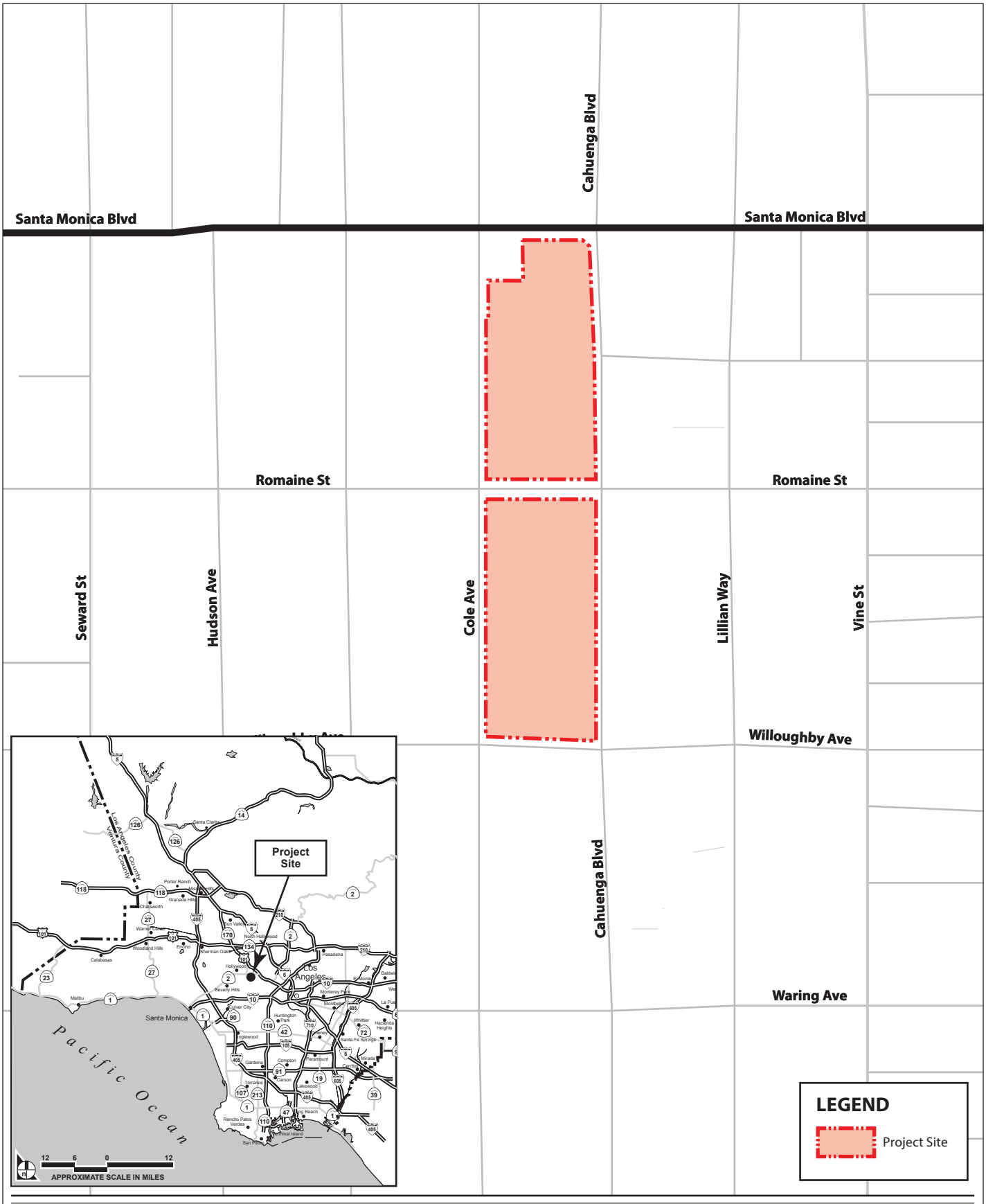

Figure 1
Project Location Map

Source: Eyestone Environmental, 2023; ArcGIS, 2023.

Project Site is served by two public transit agencies, including local and regional bus lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro) and the Los Angeles Department of Transportation (LADOT).

3.2.2 Existing Conditions

Figure 2, Aerial Photograph of the Project Vicinity, on page 10 provides an aerial photograph of the Project Site including the existing two-story office building located at the southeast corner of Santa Monica Boulevard and Cole Avenue on the North Block. This building is not a part of the Project or the Project Site, and therefore, would remain in its current condition.

As shown in Figure 2, the Project Site is currently developed with structures consisting of 189,843 square feet of existing floor area. Vehicular access to the Project Site is currently available via five driveways along Cole Avenue, four driveways along Cahuenga Boulevard. The North Block is currently developed with the former Technicolor Motion Picture Corporation that consists of 15 buildings, including a mix of administration and office buildings, film processing laboratories, film vaults, and storage and utility buildings. The buildings range in height from one to four stories, with a combined floor area of 177,066 square feet. The existing building located along Romaine Street within the North Block has an existing legal nonconforming rooftop sign. The Project also proposes to retain other on-site existing permitted signs. The South Block is currently developed with surface parking areas and a six-story parking garage that has a ground floor office use and a dance studio with a combined floor area of 12,777 square feet.

The Project Site is relatively flat with limited ornamental landscaping. Existing landscaping within the Project Site includes 62 on-site trees and 47 street trees located within the public rights of way surrounding the Project Site. Existing on-site and street trees include 13 species such as Date Palm, Tipu Tree, and Queen Palm. None of the on-site trees or street trees are protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.[3,4]

The Project Site is located within the Hollywood Community Plan area. The Project Site is designated as Limited Manufacturing and is zoned as MR1-1-SN (Restricted Industrial, Height District No. 1, Hollywood Signage Supplemental Use District). The MR1 Zone is an expressly corresponding zone to the Project Site's Limited Manufacturing land use designation. The MR1 Zone includes limited commercial and manufacturing, clinics, media production, limited machine shops, animal hospitals, and kennel uses by right. Specific to the Project, the MR1 Zone expressly permits uses including motion picture, television, video, and other media production with outdoor sets by right. The "1" in the Project Site's zoning designation refers to the Project Site's location in Height District No. 1. All uses

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[3] City of Los Angeles Tree Inventory Report—Tree Report for Film Studio Project at 6300 and 6311 Romaine Street, LSA, April 2023. See Appendix IS-1 of this IS.

[4] Pursuant to Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure four inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure four inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub. This definition does not include any tree or shrub grown or held for sale by a licensed nursery, or trees planted or grown as part of a tree planting program.

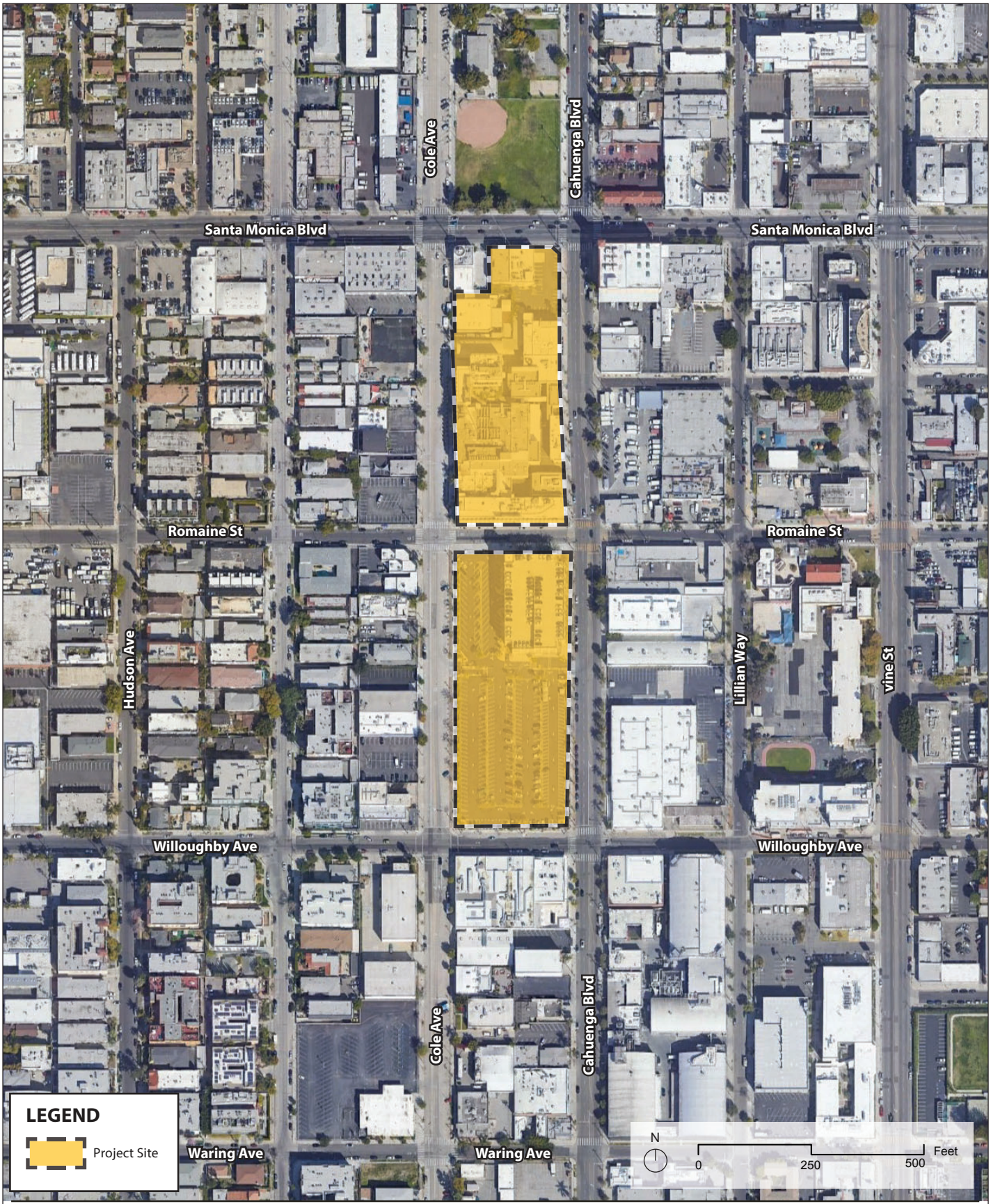

Figure 2

Aerial Photograph of the Project Vicinity

Source: Google Earth Pro, 2023; Eyestone Environmental, 2023.

located in the MR1 Zone and within Height District No. 1 are restricted to a maximum floor area ratio (FAR) of 1.5:1.[5] Height District No. 1 does not impose a vertical height limitation on the Project Site. The MR1 Zone does not impose any setback requirements on commercial or industrial uses. The SN designation indicates that these parcels are located within the Hollywood Signage Supplemental Use District (HSSUD), where signage is subject to City of Los Angeles Ordinance No. 181340, which acknowledges and promotes the continuing contribution of signage to the distinctive aesthetic of Hollywood and prevents blight otherwise created by poorly placed and badly designed signs throughout Hollywood.

On May 3, 2023, the City Council adopted the Hollywood Community Plan Update. Following adoption of the Hollywood Community Plan Update, the implementing ordinances will be reviewed and finalized by the City Attorney to ensure form and legality. After this process is complete, the Hollywood Community Plan Update would be effectuated by the City Council. The Hollywood Community Plan Update would rezone both the North Block and the South Block to [Q]M1-2D-SN, which would allow an FAR of 1.5:1 within 150 feet of Santa Monica Boulevard between McCadden Place and Lilian Way, and 3:1 FAR otherwise. The proposed Qualified Classification (Q Classification) prohibits the development of residential units, limits retail and restaurant use to the ground floor and to 20,000 square feet, eliminates requirements for additional parking spaces for change of use to Live Equity Theaters, and prohibits automobile repair and related uses. Further, the M1 Zone would permit any use as described above in the MR1 Zone provided all regulations are complied with, except that front yard setbacks are not required. The proposed Development Limitation ("D Limitation") would allow an FAR of 3:1 if the Project includes a minimum of 0.7:1 FAR (approximate 195,673 square feet) of media-related industrial uses. As described above, although the Hollywood Community Plan Update has been adopted by the City Council, it is currently undergoing a review by the City Attorney's office for form and legality before it is finalized and becomes effective. Therefore, since this application was filed before the Hollywood Community Plan Update becomes effective, it does not apply to this entitlement.

The Project Site is also located within a Transit Priority Area (TPA) pursuant to Senate Bill (SB) 743. SB 743 established new rules for evaluating aesthetic and parking impacts under CEQA for certain types of projects. Specifically, Public Resources Code (PRC) Section 21099(d) states: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." Employment center projects are projects located on property zoned for commercial uses and within a TPA, and with a floor area ratio of not less than 0.75, and TPAs are defined as areas within 0.5 mile of a major transit stop that are existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in an adopted Transportation Improvement Program (TIP) (PRC, Section 21099.) The Project qualifies as an employment center on an infill site located within a TPA, as the Project Site is located within 0.5 miles of several major Metro bus stops. Thus, in accordance with SB 743 and the City's Zoning Information file (ZI) No. 2452, the Project's aesthetic and parking impacts are not considered significant as a matter of law. In addition, the Project Site is also located within the boundaries of the Los Angeles State Enterprise Zone.

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

The majority of the Project Site is located within the Entertainment Industry Support Services Planning District, which was identified as a potential planning district by SurveyLA. The Entertainment Industry Support Services Planning District coincides with a large industrially zoned area oriented around the intersection of Santa Monica Boulevard and Highland Avenue in Hollywood. The Entertainment Industry Support Services Planning District contains the most significant collection of entertainment industry-related support services buildings in Hollywood. Despite its significance, the area does not have sufficient integrity and/or cohesion to qualify as a historic district. Even so, because of its significance to the entertainment industry and Hollywood as the center of that industry, the area may warrant special consideration for local planning purposes.[6]

3.2.3 On-Site Historic Cultural Monument

The southern portion of the North Block is occupied by the Technicolor Motion Picture Corporation , which was designated Historic Cultural Monument (HCM) LA-1289 on June 14, 2023.[7] As shown in Figure 3, Historic-Cultural Monument LA-1289 on page 13, the HCM boundary encompasses six contributing buildings and structures (Buildings 3, 4, 4F, 5, 7, and 12) and one non-contributing building (Building 15). The boundary of the HCM encompasses the historic core of the Technicolor Site, including the original building constructed within the North Block by Technicolor in 1924, the expansion of the facilities in the late 1920s and early 1930s, and additions to the property in the late 1930s and 1940s. The historic core of the former Technicolor Site reflects the height of Technicolor's significance and its dominance in the 1920s-1940s, during Hollywood's Golden Age. The Technicolor Site is significant under local Criterion 1 for its association with Technicolor, Inc., and the company's pioneering development of its eponymous color film process for motion pictures.

3.2.4 Surrounding Land Uses

The area surrounding the Project Site is highly urbanized and includes a mix of low- to mid-rise buildings containing a variety of industrial, commercial, and residential uses. The surrounding properties are generally zoned MR1, which is consistent with the zoning of the Project Site. Directly north of the Project Site, across Santa Monica Boulevard, is property zoned as OS-1XL (open space), which includes a baseball field, a basketball court, an outdoor pool, and a recreation center. To the east of the Project Site, across Cahuenga Boulevard, there is additional property zoned as MR1-1-SN, which includes a six-story storage facility along with a mix of low-rise buildings and surface parking lots. To the south of the Project Site, across Willoughby Avenue, there is property zoned as MR1-1-SN, which includes a photography studio and a veterinary hospital. To the west of the Project Site, across Cole Avenue, there is land zoned as MR1-1-SN, comprised of low-rise buildings providing a variety of land uses such as retail, office, and surface parking lots.

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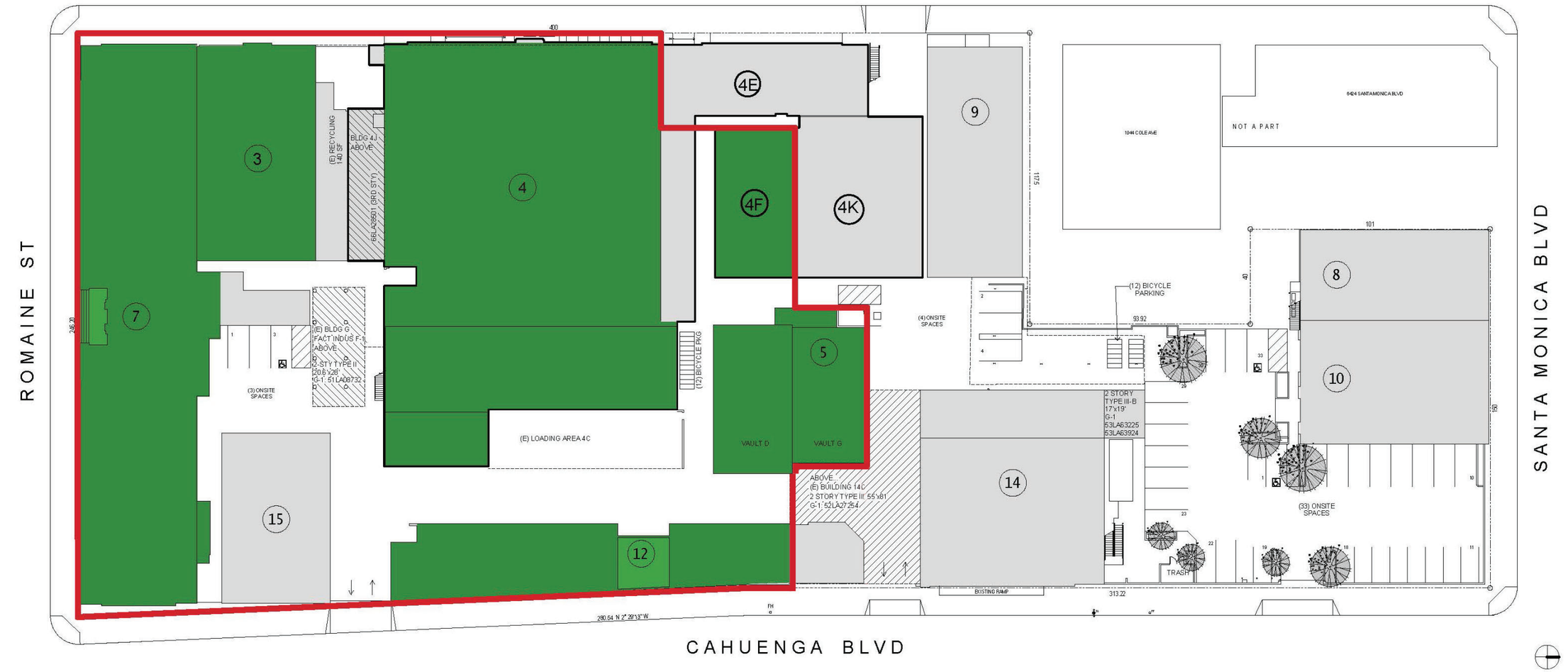
6 SurveyLA, Hollywood Historic Districts, Planning Districts and Multi-Property Resources, November 2015, p. 390.

7 LACityClerk Connect, Council File: 23-0405, https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=23-0405, accessed November 30, 2023.



NON-CONTRIBUTING STRUCTURE

CONTRIBUTING STRUCTURE

HISTORIC-CULTURAL MONUMENT BOUNDARY

Figure 3
Historic-Cultural Monument LA-1289

Source: Historic Resources Group, 2023.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

As discussed above and summarized in Table 1 on page 15, the Project proposes a mixed-use entertainment studio campus on an approximately 6.4-acre site (Project Site) and comprising the majority of two consecutive blocks bisected by Romaine Street into the North Block and South Block, and is bounded by Cahuenga Boulevard to the east and Cole Avenue to the west. The Project would construct 452,747 square feet of new soundstage buildings, production, office, retail, and restaurant uses, and to renovate 108,197 square feet of existing production, office, and gymnasium uses, including the former Technicolor Motion Picture Corporation which is designated as Los Angeles Historic-Cultural Monument LA-1289, , into office and production uses. On the North Block, the Project proposes to develop a total floor area of 282,591 square feet, consisting of six existing structures to be renovated, one rooftop structure addition to the existing Building 4, one new seven-story office building, and a one-level subterranean garage and surface parking areas. On the South Block, the Project proposes to construct a total floor area of 278,353 square feet, consisting of two soundstage buildings, with each soundstage building containing two production studios, two new office buildings, and a two-level subterranean garage Upon completion, the Project would result in a total floor area of 560,944 square feet, for a FAR of approximately 2:1, with a maximum building height of seven stories, or 103 feet. As shown on Figure 4, Demolition Plan—North Block, and Figure 5, Demolition Plan—South Block on pages 16 and 17, respectively, a total of 81,646 square feet of floor area consisting of existing office, industrial, retail, and dance studio uses, and a six-level above-ground parking structure and surface parking areas would be demolished.

3.3.2 Design and Architecture

The Project would transform the Project Site from underutilized surface parking areas and a mix of buildings of varied age and style into a cohesive and modernized architectural development providing office space and production uses that would be compatible with surrounding uses. The development of office spaces would provide opportunities for entertainment and related companies to headquarter their offices close to production studios, and would contribute to maintaining Hollywood's status as a major employment center.

The Project structures would include buildings of varying heights, roof lines of varying articulation, and landscaped balconies, terraces, and open space, all of which would reduce the Project's massing and allow the Project to utilize the flow of natural breezes. Outdoor decks and courtyards would further reduce the Project's massing and provide additional open space areas for employees and visitors. As shown on Figure 6, Building Elevation—North Block, and Figure 7, Building Elevation—South Block on pages 18 and 19 respectively, the building massing on the upper floors would be set back to enable the modern design to be viewed from all sides. The ground floor retail and restaurant uses would provide commercial space to serve the Project's employees, as well as the public.

Table 1
Summary of Existing and Proposed Floor Area

Use	Existing (sf)	Demolition (sf)	Existing to Remain/ Renovated (sf)	Proposed New Construction (sf)	Total Project Floor Area (sf) [f]
Office	126,413	47,599	105,087 [b, c]	342,298	447,385
Production [a]	3,110	0	3,110 [d]	98,447	101,557
Gymnasium	26,273	0	0	0	0
Restaurant	0	0	0	8,786	8,786
Retail	3,834	3,834	0	3,216	3,216
Industrial	20,241	20,241	0	0	0
Dance Studio	9,972	9,972	0	0	0
Total	**189,843**	**81,646**	**108,197**	**452,747 [d]**	**560,944 [e]**

sf = square feet

[a] *Production uses are inclusive of soundstage buildings and associated production uses.*

[b] *26,273 square feet of existing gymnasium uses would be renovated to offices uses at Project buildout.*

[c] *126,413 square feet of existing office uses – 47,599 square feet of existing office uses to be demolished + 26,273 square feet of existing gymnasium uses to be renovated and converted to office uses = 105,087 square feet of total existing office uses to remain and be renovated/converted.*

[d] *3,110 square feet of existing production uses would remain/be renovated at Project buildout.*

[e] *Total is one square foot higher due to rounding.*

[f] *Total is proposed new construction plus the existing uses to remain/renovated.*

Source: RIOS, 2023.

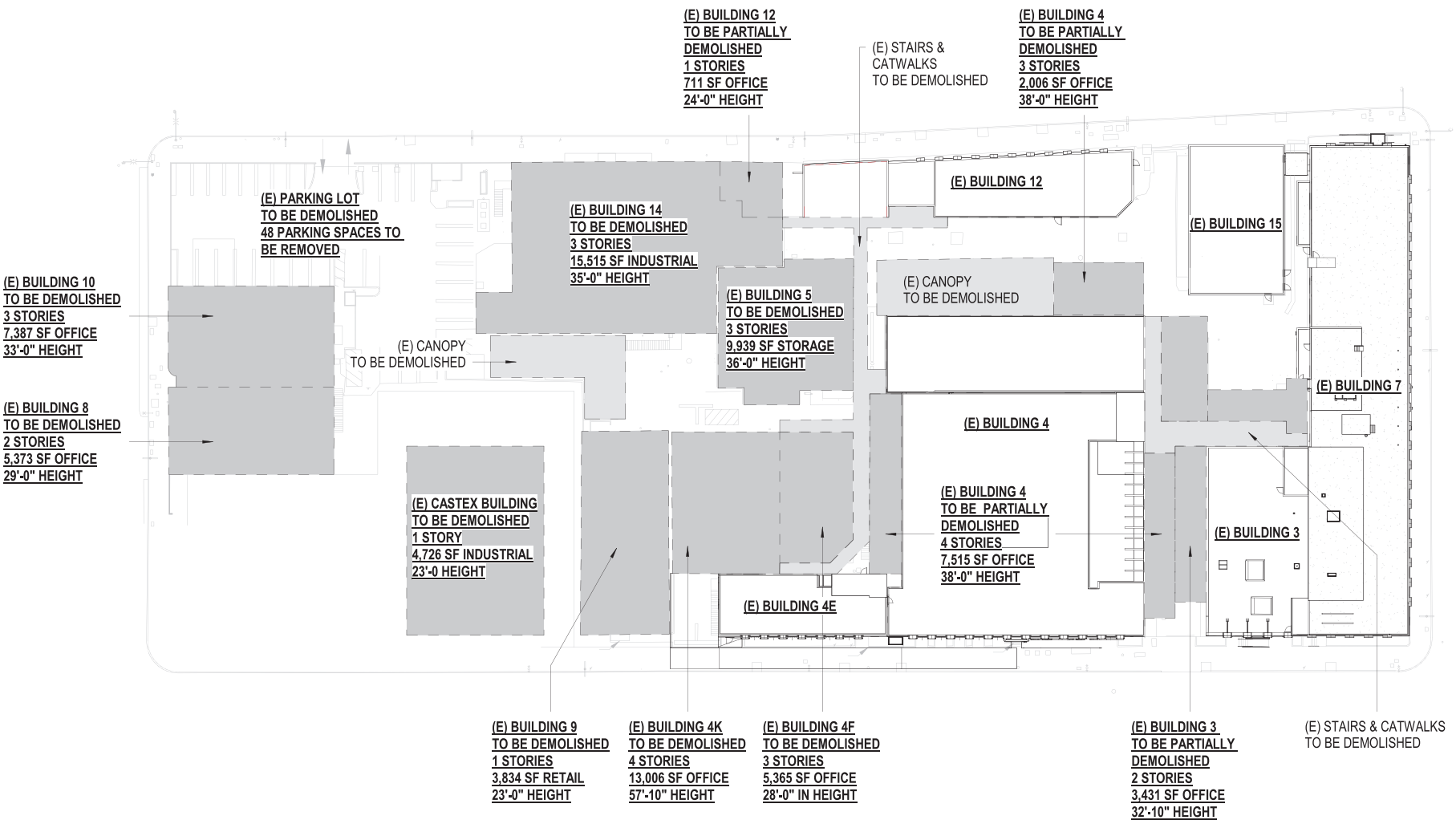


Figure 4
Demolition Plan – North Block

Source: RIOS, 2023.

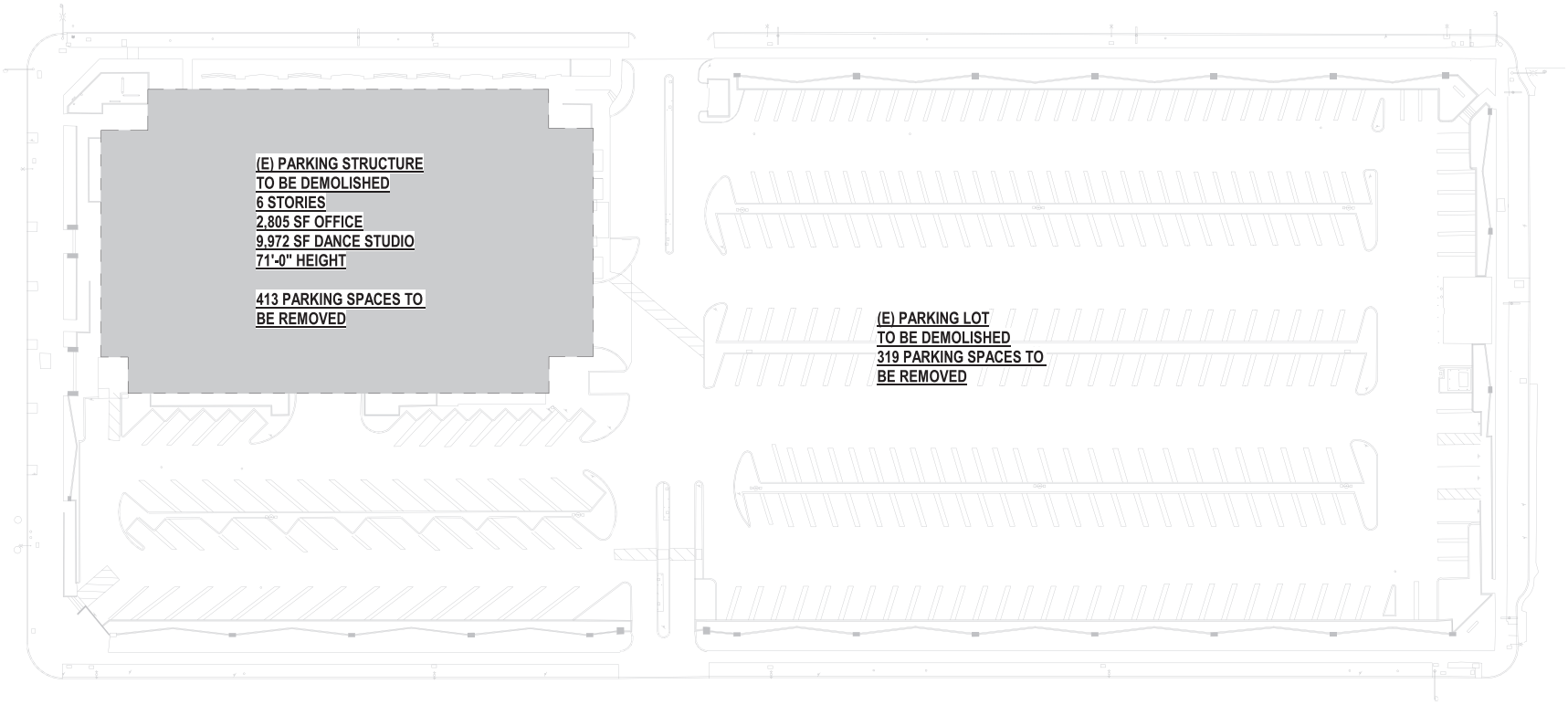


Figure 5
Demolition Plan – South Block

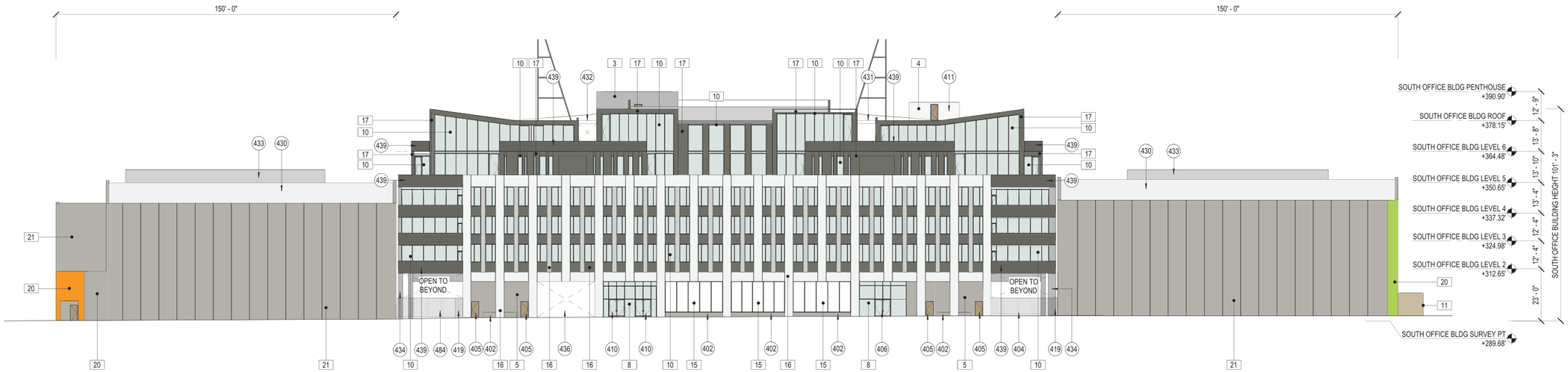
Source: RIOS, 2023.

NORTH BLOCK - CAHUENGA BLVD ELEVATION - EAST

NORTH BLOCK - COLE AVE ELEVATION - WEST

Figure 6
Building Elevation - North Block

Source: Rios, 2023.



SOUTH BLOCK - CAHUENGA BLVD ELEVATION - EAST

SOUTH BLOCK - COLE AVE ELEVATION - WEST

Figure 7
Building Elevation - South Block

Source: Rios, 2023.

North Block

As shown in Figure 8, Conceptual Site Plan, on page 21 and Table 2 on page 22, the Project proposes to construct a new office building referred to as the North Office Building, to renovate six existing structures, and to construct one new addition referred to as the Building 4 Addition. The North Office Building would include a total of 173,488 square feet, including 167,742 square feet of office uses, 1,396 square feet of retail uses, and 4,350 square feet of restaurant uses. The North Office Building would be seven stories tall, including a three-story podium and four stories above, and up to 102 feet nine inches in height. The three-story podium would provide a pedestrian-oriented streetscape and the four upper floors would be stepped back along Santa Monica Boulevard. As shown on Figure 9, Conceptual Rendering—North Block, on page 23, the North Office Building would be designed with metal balconies, landscaped terraces, and large glass windows. The North Office Building would also include additional ground floor uses such as a lobby and a loading/trash pickup area. The Building 4 Addition would include a total of 906 square feet, including office uses within a new upper level located on top of the existing Building 4, for a total of four stories and up to 61 feet one inch in height. The existing buildings to be renovated (Buildings 3, 4, 4E, 7, 12, and 15) on the North Block, which range in height from 31 feet two inches to 63 feet two inches, would include 105,087 square feet of office uses. As such, Project development on the North Block would offer various office, retail, and restaurant uses that would be incorporated into the renovated and new structures with different yet compatible architectural styles, building shapes, and heights. The North Block's buildings would be integrated by landscaped open space areas and pathways for ingress and egress. The North Block would include one level of subterranean parking beneath the North Office Building as well as surface parking areas accessible from Cahuenga Boulevard and Cole Avenue.

Two structures within the boundary of the HCM-LA 1289, Buildings 4F and 5, would be fully demolished, and portions of two additional structures, Buildings 3 and 4, would be partially demolished. The portions of Buildings 3 and 4 that would be partially demolished represent utilitarian additions that do not contribute to the significance of the Buildings or the HCM overall; further, even with the partial demolitions, both Buildings would retain their respective character-defining features and would contribute to the HCM. Buildings 4F and 5 are storage/film vaults that have been altered outside the period of significance. These structures cannot be adaptively reused because reuse would require substantial alteration, as a result of which they would no longer convey their historic significance. The structures are also of secondary importance to the HCM, as they are not architecturally distinctive, and do not form part of the public face of the HCM, as they are located at the interior of the property. These structures were not central to the operation of the technological innovations that make the HCM historic, and were simply storage facilities. In addition, the HCM-LA 1289 would retain other examples of the film vault property type following implementation of the Project, as the historical resource is comprised of the group of buildings that collectively constitute the HCM-LA 1289. The remaining five buildings (four contributing buildings and one non-contributor) within the HCM boundary would be rehabilitated according to the Secretary of the Interior's Standards for Rehabilitation.[8] Further, the new construction proposed as part of the Project would be located

[8] The National Park Service issued the Secretary's Standards with accompanying guidelines for four types of treatment for historic properties: preservation, rehabilitation, restoration, and reconstruction. The Standards for Rehabilitation provide direction in making appropriate choices in planning the repairs, alterations, and additions that may be part of a rehabilitation project. The intent of the Standards is to assist the long-term preservation of a property's significance through the preservation of historic materials and features.

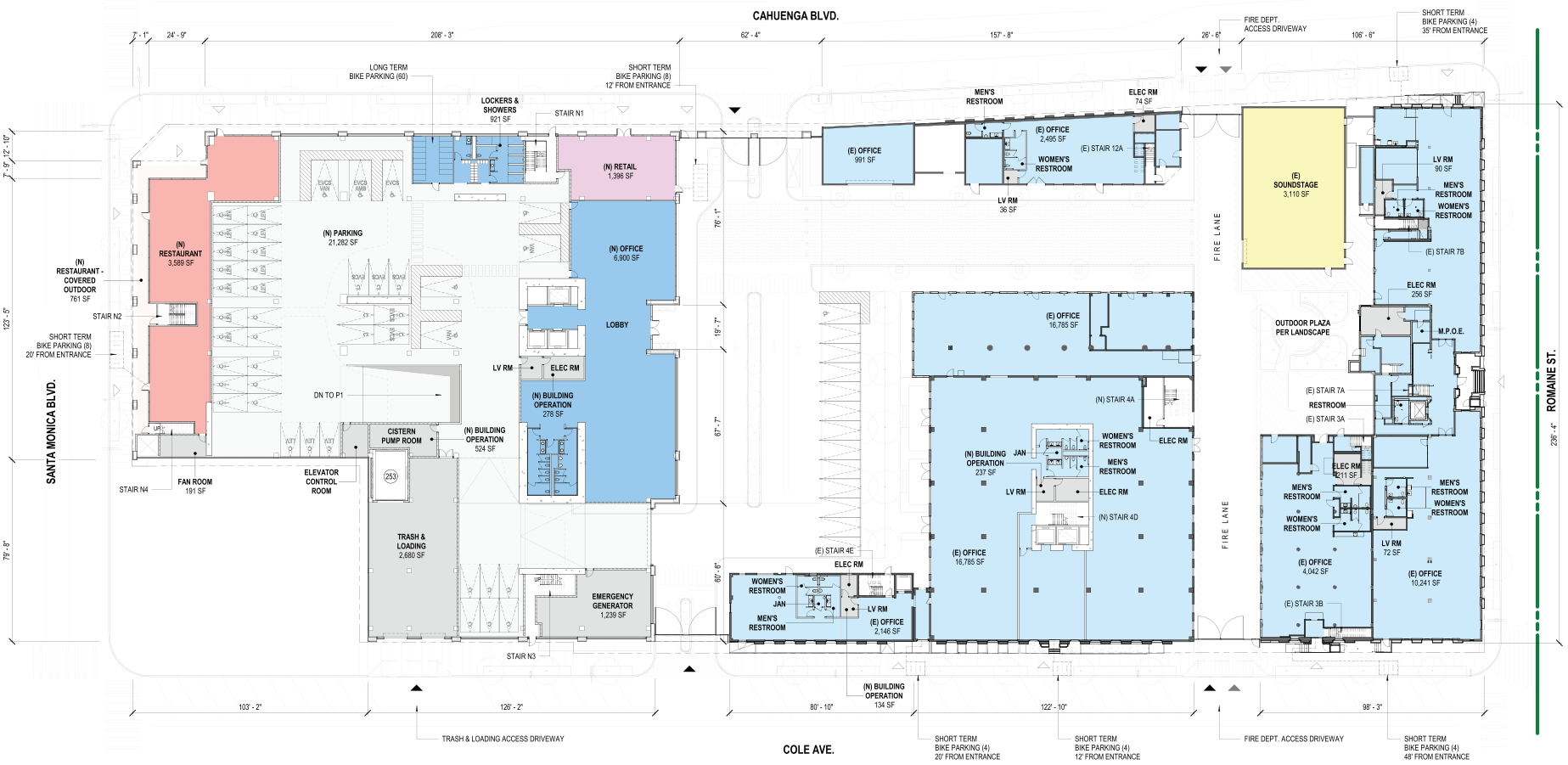


Figure 8
Conceptual Site Plan – North Block

Source: RIOS, 2023.

Table 2
Project Development Program

Building	(E) Office	(N) Office	(E) Production	(N) Production	(N) Restaurant	(N) Retail	Subtotal
North Block							
Building 3	7,827 sf	0 sf	0 sf	0 sf	0 sf	0 sf	7,827 sf
Building 4	52,381 sf	0 sf	0 sf	0 sf	0 sf	0 sf	52,381 sf
Building 4 Addition	0 sf	906 sf	0 sf	0 sf	0 sf	0 sf	906 sf
Building 4E	8,067 sf	0 sf	0 sf	0 sf	0 sf	0 sf	8,067 sf
Building 7	29,794 sf	0 sf	0 sf	0 sf	0 sf	0 sf	29,794 sf
Building 12	7,018 sf	0 sf	0 sf	0 sf	0 sf	0 sf	7,018 sf
Building 15	0 sf	0 sf	3,110 sf	0 sf	0 sf	0 sf	3,110 sf
North Office Building	0 sf	167,742 sf	0 sf	0 sf	4,350 sf	1,396 sf	173,488 sf
North Block Subtotal	*105,087 sf*	*168,648 sf*	*3,110 sf*	*0 sf*	*4,350 sf*	*1,396 sf*	*282,591 sf*
South Block							
Cole Bungalow	0 sf	29,213 sf	0 sf	5,819 sf	0 sf	1,049 sf	36,081 sf
Soundstage Building A	0 sf	0 sf	0 sf	36,183 sf	0 sf	771 sf	36,954 sf
Soundstage Building B	0 sf	0 sf	0 sf	33,709 sf	0 sf	0 sf	33,709 sf
South Office Building	0 sf	144,437 sf	0 sf	22,736 sf	4,436 sf	0 sf	171,609 sf
South Block Subtotal	*0 sf*	*173,650 sf*	*0 sf*	*98,447 sf*	*4,436 sf*	*1,820 sf*	*278,353 sf*
Total	**105,087 sf**	**342,298 sf**	**3,110 sf**	**98,447 sf**	**8,786 sf**	**3,216 sf**	**560,944 sf**

(E) = Existing
(N) = New
sf = square feet
Source: Rios, 2023.

outside the boundary of the HCM-LA 1289, thereby maintaining the historic character and spatial relationships of the historic core of the Technicolor Site. The new construction would be separated from the existing buildings within the HCM-LA 1289 boundary and therefore, the character-defining features of the HCM would remain intact and visible, and its inter-relationships on the Project Site and with the surrounding area would be retained.

Figure 9
Conceptual Rendering – North Block

Source: RIOS, 2023.

South Block

As shown on Figure 10, Conceptual Site Plan—South Block, on page 25 and Table 2 on page 22, the Project would construct two soundstage buildings and two office buildings with associated production uses, referred to as the South Office Building and the Cole Bungalow on the South Block. The soundstage buildings, which would total 69,892 square feet, would each be one story and up to 63 feet one inch and 63 feet nine inches in height, respectively. Attached to the northern Soundstage Building would be 771 square feet of publicly accessible retail kiosks, which would be located along Romaine Street and would further activate the streetscape. The South Office Building would be located along Cahuenga Boulevard in the center of the South Block and would include a total of 171,609 square feet, including 144,437 square feet of office uses, 22,736 square feet of production support uses including mill space, and 4,436-square-foot roof top restaurant. The South Office Building would be six stories and up to 101 feet three inches in height. Additionally, the South Office Building would provide ground floor uses including a lobby and a trash pickup/loading area. The South Office Building would be designed with a modern architectural style, including landscaped terraces and slanted roofs of varying heights, as shown on Figure 11, Conceptual Rendering—South Block, on page 26. The Cole Bungalow, which would be located along Cole Avenue in the center of the South Block would include a total of 36,081 square feet, including 29,213 square feet of office uses and a ground floor lobby, 5,819 square feet of ground floor production uses, and 1,049 square feet of retail space. The Cole Bungalow would be four stories and approximately 59 feet in height. The Cole Bungalow would be designed in a contemporary architectural style to be compatible with the South Office Building, with roofs of varying height and landscaped rooftop decks. In addition to the South Office Building and Cole Bungalow, production parking and loading areas would occupy the center portion of the South Block between the Project's proposed soundstages. Additional design materials such as murals and landscaping would be used to improve the aesthetic qualities of the street-facing façades of the soundstages. A two-level subterranean parking garage would extend underneath the entirety of the South Block. A LADWP Transformer Yard would be located south of the soundstage building along Willoughby Avenue. However, the area for this use would not constitute floor area as defined by Los Angeles Municipal Code (LAMC) Section 12.03.

3.3.3 Open Space and Landscaping

As a commercial development, the Project is not required to provide open space in accordance with the LAMC Section 12.21 G. Notwithstanding, the Project's landscaping and open space plan has been designed to provide useable open space on-site, while at the same time enhancing the public realm and creating more effective transitions between off-site and on-site areas and uses. As shown in Figure 12, Conceptual Open Space and Landscape Plan—North Block, and Figure 13, Conceptual Open Space and Landscape Plan—South Block, on pages 27 and 28, respectively, landscaping and open space elements would use a varying plant palette and would be located throughout the Project Site to unify the various buildings and activities on the Project Site's ground floor areas, within the roof decks of the buildings, and along the streetscape. Plantings would include resilient, drought-tolerant, native, and adaptive tree, shrub, and groundcover species, including shade trees.

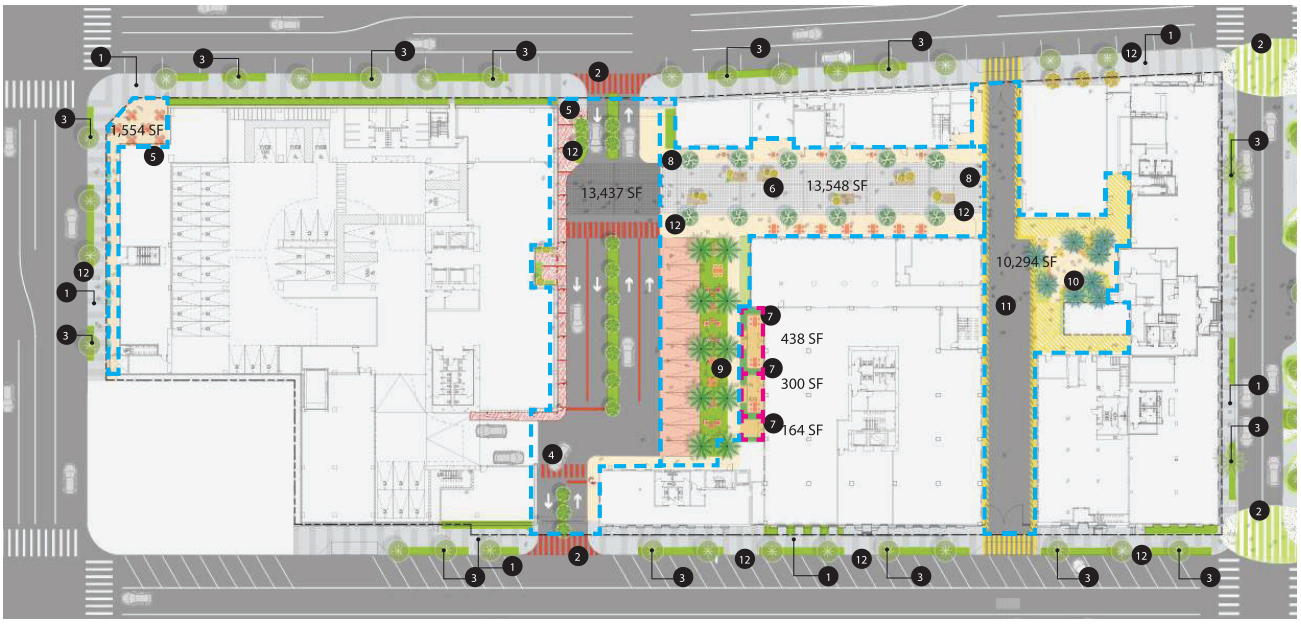
In addition to contributing to creating a cohesive visual identity for the Project Site, the Project's streetscape improvements would also enhance the public realm and the pedestrian experience. The Project would include new streetscape landscaping such as street trees and shrubs along Santa Monica Boulevard, Cahuenga Boulevard, Cole Avenue, Romaine Street, and Willoughby Avenue. These perimeter area improvements would also include lighting, wayfinding signage, outdoor seating,

Figure 10
Conceptual Site Plan – South Block

Source: RIOS, 2023.

Figure 11
Conceptual Rendering – South Block

Source: RIOS, 2023.



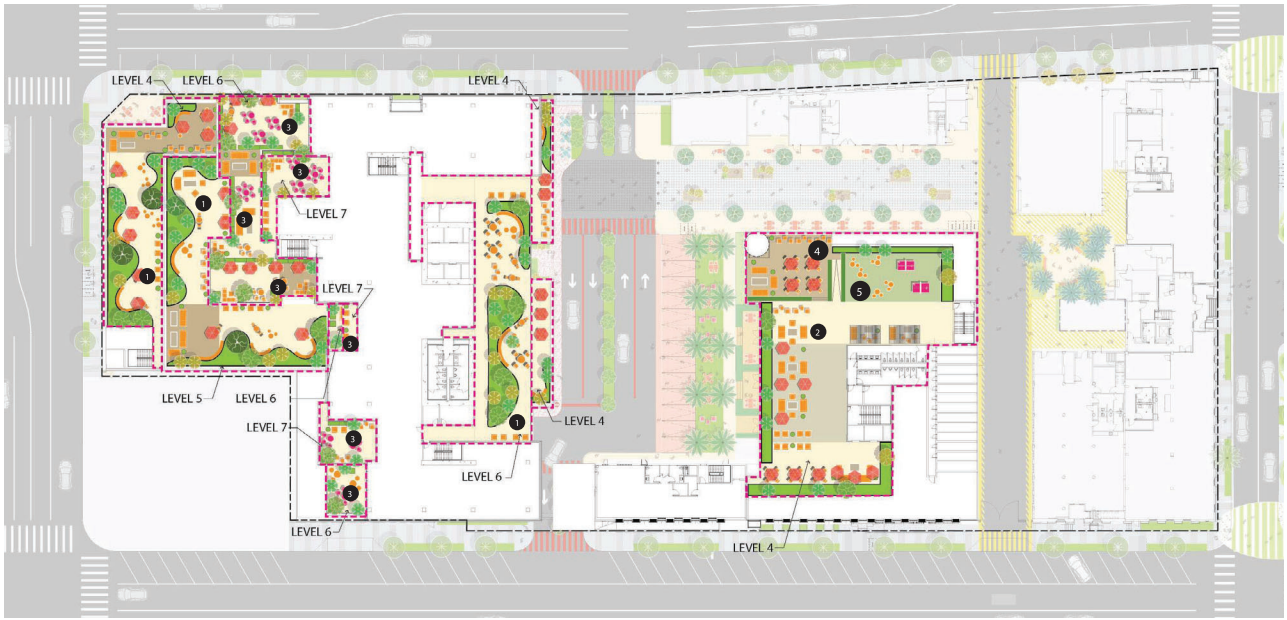
COMMON SPACE = 38,837 SF

PRIVATE SPACE = 902 SF

LANDSCAPE AREA= 4,440 SF

SITE ELEMENTS

1. IMPROVED SIDEWALK
2. SPECIAL PAVED PEDESTRIAN CROSSING AT CURB CUT OR STREET INTERSECTION
3. PLANTED TREE WELL
4. SPECIAL PAVED PEDESTRIAN CROSSING
5. OUTDOOR SEATING
6. FILMING BACKLOT STREET
7. BUNGALOW COURTYARDS WITH RAISED DECKS AND PRIVACY HEDGES
8. REMOVABLE BOLLARDS
9. RECREATIONAL LAWN
10. TROPICAL OUTDOOR WORKING WITH SPECIAL PAVED PADS AND OUTDOOR SEATINGS
11. FIRE LANE
12. SHORT TERM BIKE PARKING STALLS



OPEN SPACE

	COMMON AREA	PRIVATE AREA	LANDSCAPE AREA
Level 4	14,380 SF	5,386 SF	3,228 SF
Level 5	-	5,477 SF	1,860 SF
Level 6	5,280 SF	4,592 SF	1,247 SF
Level 7	-	1,856 SF	1,247 SF

SITE ELEMENTS

1. OUTDOOR WORKING TERRACE WITH RAISED PLANTER AND BENCHES
2. OUTDOOR EVENT DECK
3. PRIVATE OUTDOOR WORKING DECK
4. RAISED EVENT DECK
5. ARTIFICIAL EVENT LAWN

Figure 12

Conceptual Open Space and Landscape Plan

North Block

Source: RIOS, 2023.

OPEN SPACE

	COMMON AREA	PRIVATE AREA	LANDSCAPE AREA
Level 4	-	2,390 SF	590 SF
Level 5	3,700 SF	5,610SF	1,010 SF
Level 6	-	5,193 SF	-

SITE ELEMENTS

1. OUTDOOR WORKING TERRACE WITH RAISED PLANTER AND BENCHES
2. PRIVATE OUTDOOR WORKING DECK

LANDSCAPE AREA= 1,800 SF

SITE ELEMENTS

1. IMPROVED SIDEWALK
2. SPECIAL PAVED PEDESTRIAN CROSSING AT CURB CUT OR STREET INTERSECTION
3. PLANTED TREE WELL
4. BENCH
6. PLANTING AREA
7. SHORT TERM BIKE PARKING STALLS

Figure 13

Conceptual Open Space and Landscape Plan – South Block

Source: RIOS, 2023.

and short-term bicycle parking. On the North Block, the Project would provide 38,837 square feet of outdoor space that could be used by the public, as well as 18,203 square feet of private space that would only be accessible to the tenants of the office building. On the South Block, the Project would provide 13,193 square feet of private open space and no public open space. The Project would also provide landscaped roof decks and terraces within the North Office Building, Building 4 Addition, Cole Bungalow, and South Office Building.

The Project would remove 61 existing on-site trees and 15 street trees, none of which are protected under the City's Protected Tree and Shrubs Ordinance No. 186,873. The Project would replace the removed on-site trees with 141 new trees, including drought tolerant, disease resistant, and non-invasive species such as Palo Verde, Marina Strawberry, and Fruitless Olive Tree. In addition, in accordance with City requirements, the Project would replace the removed street trees at a 2:1 ratio with 39 new street trees, including Brisbane Box, Date Palms, and Australian Willow.

3.3.4 Access, Circulation, and Parking

Vehicular access to the Project Site would be provided along Cahuenga Boulevard and Cole Avenue. The North Block would have one driveway along Cahuenga Boulevard and one driveway along Cole Avenue which would provide ingress and egress access for internal circulation within the Project Site and access to the subterranean parking entrance. An additional LAFD-access only driveway will be located in the North Block connecting Cole Avenue to Cahuenga Boulevard. The South Block would have one production vehicle/LAFD access only driveway and one driveway providing ingress and egress to the subterranean parking along Cahuenga Boulevard. Additionally, the South Block would have two production vehicle/LAFD access only driveways, as well as one additional driveway providing ingress and egress to subterranean parking garage along Cole Avenue. No vehicular access would be provided along Santa Monica Boulevard, Romaine Street, or Willoughby Avenue to promote pedestrian safety.

Primary pedestrian access to the Project Site would be provided at the grade level via several access points along Cahuenga Boulevard, Cole Avenue, and Santa Monica Boulevard. The Project would encourage pedestrian activity through the orientation and massing of its proposed new buildings along adjacent streets, through its landscaping, and through its site design and pedestrian-oriented streetscape. Specifically, the grade level of the North Office Building would contain restaurant and retail uses that would attract pedestrian activity. In addition, the Project's entrances along Cahuenga Boulevard, Cole Avenue, and Santa Monica Boulevard would allow for pedestrian access at grade level and unobstructed from view at the public right-of-way.

In accordance with LAMC Section 12.21 A.16(a)(2), the Project would provide 62 short-term and 108 long-term bicycle parking stalls, for a total of 170 bicycle parking stalls. Additional cyclist amenities would include 140 lockers and 12 showers, in compliance with LAMC requirements. On the North Block, 60 long-term bicycle parking spaces, along with 62 lockers and six showers would be provided at grade level within the parking garage, and 32 short-term bicycle parking spaces would also be provided on the ground floor as well as along Santa Monica Boulevard, Cahuenga Boulevard, and Cole Avenue. On the South Block, 48 long-term bicycle parking spaces, along with 78 lockers and six showers would be provided within the first level of the two-level subterranean parking garage and 30 short-term bicycle parking spaces would be provided at grade level along Romaine Street, Cahuenga Boulevard, and Cole Avenue.

Access for loading and trash pickup would be provided via the driveway located on Cole Avenue for the North Block. Access for loading and trash pickup would be provided via the driveway located on Cahuenga Avenue for the South Block. Loading areas and associated production uses would be internal to the South Block between the Soundstage Buildings and would be accessible via Cole Avenue and Cahuenga Avenue.

On September 22, 2022, Assembly Bill (AB) 2097 was adopted by the State of California and subsequently added to California Government Code Section 65863.2. AB 2097 prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within one-half mile of a Major Transit Stop.[9] Per AB 2097, the Project is not required to provide parking as it is a mixed-use project with production and commercial uses, and it is located within 0.2 mile of the bus stops for Metro Line 4 at the intersections of Santa Monica Boulevard/Vine Street and Santa Monica Boulevard/Wilcox Avenue, and for Metro Line 210 at the intersections of Santa Monica Boulevard/Vine Street and Willoughby Avenue/Vine Street. However, as previously described, parking would be provided on-site in a one-level subterranean garage and surface parking on the North Block and a two-level subterranean garage on the South Block. Based on the proposed commercial uses, the Project would provide 1,110 vehicle parking spaces. Pursuant to Ordinance No. 187,719 and Ordinance No. 186,485, 30 percent of the Project's parking spaces would be designated as Electric Vehicle (EV) spaces capable of supporting future electric vehicle supply equipment (EVSE) with 10 percent of the spaces equipped with EV Charging Stations.

3.3.5 Lighting and Signage

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

New signage would be integrated with and complement the overall aesthetic character of proposed on-site development and surroundings. The Project would remove the existing legal nonconforming rooftop sign along Romaine Street on the North Block, along with other on-site existing permitted signs. In addition, the Project proposes four iconic open-panel roof signs, including two located on the North Block with dimensions of 61 feet four inches in width and 46 feet in height, and two located on the South Block with dimensions of 65 feet in width and 42 feet 6 inches in height, in compliance with

[9] 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."

applicable regulations set forth by the HSSUD.[10] The four roof signs would be illuminated 24-hours a day. Additional Project signage could include general ground-level and wayfinding pedestrian signage around the Project Site perimeter, building identification signs, marquee and monument signs, pillar and pole signs, banners, and other sign types such as on-site wall signs, murals, and studio graphics that are typical on production studios. Project signage may include both externally and internally lit signs, to which LAMC illumination regulations would apply.

3.3.6 Site Security

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

Office lobbies would also include security-controlled access. The Project would also be designed such that entrances to and exits from the buildings, open spaces around the buildings, and pedestrian walkways would be open and in view of surrounding sites. In addition, building exteriors and walkways would be properly lit in order to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings. Parking areas would also be sufficiently lit to maximize visibility and reduce areas of concealment.

3.3.7 Special Events

The Project's office space, production studios, and outdoor terraces may be used for hosting special events. The requested conditional use permit for the sale and dispensing of a full line of alcoholic beverages throughout the Project Site's office buildings, production studios, and outdoor terraces would allow alcoholic beverages to be served during special events between the hours of 7:00 A.M. and 2:00 A.M.

3.3.8 Sustainability Features

The Project would support environmental sustainability by incorporating sustainable building features and construction protocols required by the Los Angeles Green Building Code (LAMC Chapter IX, Article 9), the California Green Building Standards Code (California Code of Regulations, Title 24, Part 11; referred to as the CALGreen Code), and the California Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6; California Energy Code). Both in compliance with and, in some cases, in exceedance of Code requirements, a number of specific sustainable design components would be incorporated into the Project, potentially including, but not limited to: Energy Star appliances; solar-ready zones; continuous insulation and high-performance glazing to minimize

[10] As set forth by the HSSUD (Ordinance No. 181,340), an Open Panel Roof Sign shall only be permitted on a building which is at least 40 feet in height. The total area of all Open Panel Roof Signs on a building shall not exceed 25 percent of the average of the wall area of all sides of the building.

heating and cooling loads; ultra-low flow plumbing fixtures and fittings that comply with the performance requirements specified in the Los Angeles Green Building Code; weather-based irrigation systems; water-efficient plantings with drought-tolerant species; shade trees in public areas; green walls in certain outdoor areas; vegetated roofs or cool roof systems to help reduce energy use; short- and long-term bicycle parking and related amenities; use of daylighting where feasible; and energy-efficient lighting. Additionally, the Project would provide preferential parking for carpools and low-emitting and zero emission vehicles, and 30 percent of the Project's parking spaces would be designated as EV spaces capable of supporting future EVSE, with 10 percent of the spaces equipped with EV Charging Stations. Such measures would support energy conservation, water conservation, and waste reduction and will be further defined in the EIR.

3.3.9 Anticipated Construction Schedule

Construction of the Project would commence with demolition of the existing buildings proposed to be removed, as well as the existing parking garage and surface parking areas. This phase would be followed by grading and excavation for the subterranean parking levels, which could extend to a maximum depth of approximately 40 feet below ground surface (bgs). The building foundations would then be laid, followed by construction of the proposed buildings and renovation of the existing buildings to remain, paving/concrete installation, and landscape installation. Project construction is anticipated to commence in 2025 and be completed in 2028. It is estimated that 220,000 cubic yards of soil export would be hauled from the Project Site.

3.4 REQUESTED ACTIONS

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

- Pursuant to LAMC Section 12.32 F, a **Zone Change and a Height District Change** from MR1-1-SN to M1-2D-SN, allowing a maximum FAR of 3:1.
- Pursuant to LAMC Section 12.24 W.19, a **Class 2 Conditional Use Permit** for FAR averaging in a unified development in the M Zone.
- Pursuant to LAMC 12.24 W.1, a **Class 2 Main Conditional Use Permit** to allow for the sale and dispensing of a full line of alcoholic beverages for on-site consumption within four restaurants, office buildings, production studios, and outdoor areas.
- Pursuant to LAMC Section 13B.4.2, a **Project Compliance** for signage within the Hollywood Supplemental Signage Use District (HSSUD).
- Pursuant to LAMC Section 16.05, a **Project Review** to permit the development of a project which creates or results in an increase of 50,000 gross square feet or more of nonresidential floor area.

- Pursuant to LAMC Section 17.15, a **Vesting Tentative Tract Map** No. 83971 for the merger and re-subdivision of the Project Site into two ground lots and 11 airspace lots; and a haul route for 220,000 cubic yards (cy) of material.

3.5 RESPONSIBLE & TRUSTEE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency that proposes to carry out or approve a project, for which a lead agency is preparing or has prepared an EIR or negative declaration (State CEQA Guidelines Section 15381). No responsible agency has been identified for the Project. A Trustee Agency under CEQA is a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California (State CEQA Guidelines Section 15386). No trustee agencies have been identified for this Project.

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

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

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and states 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."[11]

PRC Section 21099 applies to the Project. Specifically, pursuant to PRC Section 21099, the Project is an employment center project located on an infill site within a TPA. The Project Site is located on an infill site, as that term is defined in PRC Section 21099(a)(4), because the Project Site is located in a highly urbanized area of the City of Los Angeles (City) and includes lots located within this urban area that have been previously developed. In addition, the Project Site is also located within a TPA because it is located within 0.5 mile of an existing "major transit stop". In particular, the Project Site is located within 0.2 mile of the bus stops for Metro Line 4 at the intersections of Santa Monica Boulevard/Vine Street and Santa Monica Boulevard/Wilcox Avenue, and for Metro Line 210 at the intersections of Santa Monica Boulevard/Vine Street and Willoughby Avenue/Vine Street. Further, the Project Site is located 0.3 mile from the DASH Hollywood Lines located at the intersections of Cole Avenue/Fountain Avenue and Cahuenga Boulevard/Fountain Avenue. The City's Zone Information

[11] City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA., http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf, accessed December 21, 2023.

and Map Access System (ZIMAS) also confirms the Project Site's location within a TPA, as defined in ZI No. 2452.

Therefore, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment and do not require evaluation under CEQA..

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

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

Less Than Significant Impact. Pursuant to PRC Section 21099, the Project is an employment center project that would be located on an infill site within a TPA. Therefore, in accordance with PRC Section 21099(d)(1), SB 743, and ZI No. 2452, the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA. Project impacts to aesthetic resources would be less than significant and no further evaluation of this topic in the EIR is required.

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

Less Than Significant Impact. Pursuant to PRC Section 21099, the Project is an employment center project that would be located on an infill site within a TPA. Therefore, in accordance with PRC Section 21099(d)(1), the Project's potential to damage scenic resources, including but not limited to, trees and rock outcroppings within a state scenic highway shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA. In accordance with PRC Section 21099(d)(2)(B), potential damage to historic buildings within a state scenic highway must be

considered. The nearest officially eligible state scenic highway is along the Foothill Freeway (I-210), approximately 13.4 miles northeast of the Project Site. Therefore, the Project would not substantially damage scenic resources within a state scenic highway as no scenic highways are located adjacent to the Project Site. Therefore, Project impacts to scenic resources within a state scenic highway would be less than significant and no further evaluation of this topic in the EIR is required.

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

Less Than Significant Impact. Pursuant to PRC Section 21099, the Project is an employment center project that would be located on an infill site within a TPA. Therefore, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA. Project impacts to aesthetic resources would be less than significant and no further evaluation of this topic in the EIR is required.

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

Less Than Significant Impact. Pursuant to PRC Section 21099, the Project is an employment center project that would be located on an infill site within a TPA. Therefore, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA. Project impacts to aesthetic resources would be less than significant and no further evaluation of this topic in the EIR is required.

II. AGRICULTURE AND FOREST RESOURCES

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

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

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

No Impact. The Project Site is located in an urbanized area of the City. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with studio support services and commercial uses, as well as a parking garage and surface parking areas. No agricultural uses or operations involving farmland occur on-site or in the vicinity of the Project Site. Furthermore, the Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.[12,13] As such, the Project

[12] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5533-015-018, -019, and 5533-020-023, http://zimas.lacity.org/, accessed November 28,2023.

[13] California Department of Conservation, California Important Farmland Finder, https://maps.conservation.ca.gov/DLRP/CIFF/App/index.html?marker=-118.29152006048791%2C34.02551004278704%2C%2C%2C%2C&markertemplate=%7B%22title%22%3A%22%22%2C%22longitude%22%3A-118.29152006048791%2C%22latitude%22%3A34.02551004278704%2C%22isIncludeShareUrl%22%3Atrue%7D&level=14, accessed November 28, 2023.

would not convert farmland to a non-agricultural use. No impacts would occur, and no further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is zoned MR1-1-SN (Restricted Industrial, Height District No. 1, Hollywood Signage Supplemental Use District). The Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area. Additionally, the Project Site and surrounding area are not enrolled under the California Land Conservation Act and are not subject to a Williamson Act Contract.[14] Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no further evaluation of this topic in an EIR is required.

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

No Impact. As previously discussed, the Project Site is located in an urbanized area and is currently developed with studio support services and commercial uses, as well as a parking garage and surface parking areas. The Project Site does not include any forest land or timberland. In addition, the Project Site is not zoned for forest land and is not used as forest land.[15] Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the PRC. No impacts would occur, and no further evaluation of this topic in an EIR is required.

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

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

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

No Impact. As discussed above, the Project Site is located in an urbanized area of the City and does not include farmland or forest land. Furthermore, the Project Site and surrounding area are not mapped as farmland or forest land, are not zoned for farmland/agricultural use or forest land, and do

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

[15] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5533-015-018, -019, and 5533-020-023 http://zimas.lacity.org/, accessed November 28, 2023.

not contain any agricultural or forest uses.[16] As such, the Project would not result in the conversion of farmland to non-agricultural use or in the conversion of forest land to non-forest use. No impacts would occur, and no further evaluation of this topic in an EIR is required.

III. AIR QUALITY

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

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

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

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in some level of non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [$PM_{2.5}$], and lead[17]). SCAQMD's 2016 and 2022 Air Quality Management Plans (AQMPs) contain 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

[16] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5533-015-018, -019, and 5533-020-023, http://zimas.lacity.org/, accessed December 21, 2023.

[17] Partial nonattainment designation for lead for the Los Angeles County portion of the Basin, only. The Basin has an extreme nonattainment designation for Ozone under the NAAQS. The Basin has a serious nonattainment designation for $PM_{2.5}$ under the NAAQS.

transportation, the economy, community development and the environment.[18] With regard to future growth, SCAG has prepared their Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which provides population, housing, and employment projections in local general plans for jurisdictions in SCAG's planning area. The growth projections in the RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area. Construction and operation of the Project may result in an increase in stationary and mobile source air emissions. As a result, development of the Project could have a potential adverse effect on SCAQMD's implementation of its current AQMP. Therefore, further evaluation of the Project's potential conflicts with SCAQMD's AQMP will be included in the EIR.

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

Potentially Significant Impact. As discussed above, construction and operation of the Project could result in the emission of significant levels of air pollutants in the Basin, which is currently in non-attainment of federal air quality standards for ozone (extreme), $PM_{2.5}$ (serious) and lead (partial), and state air quality standards for ozone, particulate matter less than 10 microns in size (PM_{10}), and $PM_{2.5}$.[19] As a result, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Basin. Therefore, further evaluation of the Project's potential cumulative air pollutant emissions will be included in the EIR.

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

Potentially Significant Impact. As discussed above, the Project could result in significant levels of 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, recreational, and educational uses. Therefore, further evaluation of the Project's potential to result in substantial adverse impacts to sensitive receptors will be included in the EIR.

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

Less Than Significant Impact. No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of off-road construction equipment and conventional building materials and coatings typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve operation of these types of uses.[20] In addition, the

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

19 SCAQMD, National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin, 2023.

20 SCAQMD, CEQA Air Quality Handbook, 1993.

Project's on-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

Construction and operation of the Project would also be required to comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.[21] In particular, Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.[22]

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

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒

[21] SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/rules-compliance/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed December 21, 2023.

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

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

Less Than Significant Impact. The Project Site is located in an urbanized area and is currently developed with studio support services and commercial uses, as well as a parking garage and surface parking areas. The Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.[23,24] In addition, there are no other sensitive natural communities identified by the California Department of Fish and Wildlife (CDFW) or the U.S. Fish and Wildlife Service (USFWS) located in or adjacent to the Project Site. Rather, the Project Site and surrounding areas contain urbanized and disturbed land. Due to the urbanized and disturbed nature of the Project Site, species likely to occur on-site or in surrounding areas are limited to small terrestrial and avian species typically found in urbanized developed settings. Based on the lack of species habitat on the Project Site and in the surrounding areas, it is unlikely that any special status species listed by the CDFW[25] or by the USFWS[26] would be present on-site.

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23 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1B—Biological Resources Areas (Metro Geographical Area), January 19, 1995, p. 2-18-4.

24 County of Los Angeles, Department of Regional Planning, Los Angeles County General Plan Update, Final Environmental Impact Report, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

25 California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, January 2023.

26 United States Fish and Wildlife Service, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, https://ecos.fws.gov/ecp/report/species-listings-by-state?stateAbbrev=CA&stateName=California&statusCategory=Listed, accessed December 21, 2023.

According to the Tree Inventory Report prepared for the Project included in Appendix IS-1 of this Initial Study, there are 62 non-protected trees on the Project Site and 47 non-protected street trees adjacent to the Project Site. Although unlikely, these trees could potentially provide nesting sites for migratory birds. However, the Project would comply with California Fish and Game Code Section 3503, which 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." While the Project would require the removal of the 76 existing trees, including 61 on-site trees and 15 street trees, which could potentially provide nesting sites for migratory birds, compliance with California Fish and Game Code Section 3503 and standard construction processes during nesting season would ensure that construction activities would not adversely affect nesting sites. In accordance with California Fish and Game Code Section 3503, tree removal activities associated with the Project would take place outside of the nesting season (February 1–August 31), to the extent feasible. Should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found during removal activities, a buffer would be established until the fledglings have left the nest. The size of the required buffer area would vary with the species and local circumstances (e.g., presence of busy roads) and would be based on the professional judgment of the monitoring biologist, in coordination with the CDFW.

Therefore, with compliance with California Fish and Game Code Section 3503 and standard construction processes during nesting season, 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. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

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

No Impact. The Project Site is located in an urbanized area and is currently developed with studio support services and commercial uses, as well as a parking garage and surface parking areas. No riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area.[27,28] Furthermore, the Project Site and surroundings are not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.[29,30] There are no other sensitive natural communities identified by the CDFW or the USFWS on the Project Site or its surroundings.[31,32] Therefore, the Project would not have a

[27] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5533-015-018, -019, and 5533-020-023, http://zimas.lacity.org/, accessed December 21, 2023.

[28] United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed December 21, 2023.

[29] City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1B—Biological Resources Areas (Metro Geographical Area), January 19, 1995, p. 2-18-4.

[30] County of Los Angeles, Department of Regional Planning, Los Angeles County General Plan Update, Final Environmental Impact Report, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

[31] California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), Hollywood Quad Species List, https://apps.wildlife.ca.gov/bios6/, accessed December 21, 2023.

substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur, and no further evaluation of this topic in an EIR is required.

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

No Impact. As discussed above, the Project Site is located in an urbanized area and is currently occupied with studio support services and commercial uses, as well as a parking garage and surface parking areas. No water bodies or state or federally protected wetlands exist on the Project Site or in the immediate surrounding area.[33] As such, the Project would not have an adverse effect on state or federally protected wetlands. No impact would occur, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As described above, the Project Site is located in an urbanized area and is currently occupied with studio support services and commercial uses, as well as a parking garage and surface parking areas. In addition, the areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within or surrounding the Project Site that provide linkages to natural open space areas which may serve as wildlife corridors. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.[34,35]

According to the Tree Inventory Report prepared for the Project included in Appendix IS-1 of this Initial Study, and as previously described, there are 109 trees located on-site and adjacent to the Project Site, of which 76 would be removed as part of the Project. Although unlikely, these trees could potentially provide nesting sites for migratory birds. However, the Project would comply with the Migratory Bird Treaty Act (MBTA)[36], which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. The Project would further comply with the MBTA regulations by conducting tree or vegetation removal activities outside of the nesting season (February 1–August 31), to the extent feasible, and, if tree or vegetation removal activities occur during the nesting season, the Applicant would retain a biological

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32 California Department of Fish and Wildlife, CDFW Lands, https://apps.wildlife.ca.gov/lands/, accessed December 21, 2023.

33 United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed December 21, 2023.

34 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1B—Biological Resources Areas (Metro Geographical Area), January 19, 1995, p. 2-18-4.

35 County of Los Angeles, Department of Regional Planning, Los Angeles County General Plan Update, Final Environmental Impact Report, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

36 United States Fish and Wildlife Service, Migratory Bird Treaty Act of 1918.

monitor during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and is based on the professional judgment of the monitoring biologist, in coordination with the CDFW, as appropriate. Additionally, the Project would comply with California Fish and Game Code Section 3503, which states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." In addition, the Project would include replacement of the 15 existing street trees to be removed at a 2:1 ratio in accordance with the Bureau of Street Services, Urban Forestry Division's requirements and Street Tree Ordinance No. 153500, as well as the planting of additional street trees along Santa Monica Boulevard, Cahuenga Boulevard, Cole Avenue, Romaine Street, and Willoughby Avenue. On-site trees would also be replaced at a 1:1 ratio.

Overall, in compliance with the MBTA, California Fish and Game Code Section 3503, and standard construction processes during nesting season, and replacement of street trees in accordance with the Bureau of Street Services, Urban Forestry Division's requirements, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

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

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

According to the Tree Inventory Report prepared for the Project included in Appendix IS-1 of this Initial Study, there are 62 existing trees located within the Project Site. Surrounding the Project are 47 street trees, which are all located along Cahuenga Boulevard, Cole Avenue, Romaine Street, and

Willoughby Avenue. As part of the Project, a total of 15 existing street trees would be removed.[37] However, in accordance with the requirements of the Bureau of Street Services, Urban Forestry Division and Street Tree Ordinance No. 153500, these trees would be replaced at a 2:1 ratio along Cahuenga Boulevard, Cole Avenue, Romaine Street, and Willoughby Avenue. On-site trees would be replaced at a 1:1 ratio. None of the on-site trees or street trees is considered protected by the City of Los Angeles' Tree Preservation Ordinance No. 186,873. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources including the City of Los Angeles' Tree Preservation Ordinance No. 186,873. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

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

No Impact. As described above, the Project Site is located in an urbanized area and is currently occupied with studio support services and commercial uses, as well as a parking garage and surface parking areas. No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.[38] Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No impact would occur, and no further evaluation of this topic in an EIR is required.

V. CULTURAL RESOURCES

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

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

[37] The proposed street tree removal is subject to approval by the Bureau of Street Services, Urban Forestry Division.

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

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

The southern portion of the North Block is occupied by the Technicolor Motion Picture Corporation, which was designated HCM LA-1289 on June 14, 2023. [39] As shown in Figure 3 on page 13, the HCM boundary encompasses six contributing buildings and structures (Buildings 3, 4, 4F, 5, 7, and 12) and one non-contributing building (Building 15). The boundary of the HCM encompasses the historic core of the Technicolor Site, including the original building constructed on the site by Technicolor in 1924, the expansion of the facilities in the late 1920s and early 1930s, and additions to the property in the late 1930s and 1940s. The buildings and structures within the boundary represent the primary public face of the west coast headquarters of Technicolor, and the laboratories that housed the technological advancements that culminated in Technicolor's revolutionary three-strip Process No. 4. The historic core of the former Technicolor Site reflects the height of Technicolor's significance and its dominance in the 1920s-1940s, during Hollywood's Golden Age. The Technicolor Site is significant under local Criterion 1 for its association with Technicolor, Inc., and the company's pioneering development of its eponymous color film process for motion pictures.

Based on SurveyLA, the Technicolor Motion Buildings Picture Corporation as well as the adjacent Harris and Ruble building are both examples of 1930s industrial buildings with Art Deco architecture.[40] Additionally, the Project Site is located within the Entertainment Industry Support Services Planning District, which was identified as a potential planning district by SurveyLA.[41] The Entertainment Industry Support Services Planning District coincides with a large industrially zoned area oriented around the intersection of Santa Monica Boulevard and Highland Avenue in Hollywood. The Entertainment Industry Support Services Planning District contains the most significant collection of entertainment industry-related support services buildings in Hollywood. Despite its potential significance, however, the area does not have sufficient integrity and/or cohesion to qualify as a historic district. Even so, because of its significance to the entertainment industry and Hollywood as

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[39] LACityClerk Connect, Council File: 23-0405, https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=23-0405, accessed December 21, 2023.

[40] SurveyLA, Historic Resources Survey Report: Hollywood Community Plan Area, November 2015, p. 51.

[41] SurveyLA, Hollywood Historic Districts, Planning Districts and Multi-Property Resources, November 2015, p. 390.

the center of that industry, the area may warrant special consideration for local planning purposes.[42] . As such, further evaluation of the Project's potential impacts to historic resources will be provided in an EIR.

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

Potentially Significant Impact. CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within an urbanized area of the City and has been subject to grading, excavation and fill activities, and development in the past. Therefore, surficial archaeological resources that may have existed at one time have likely been previously disturbed. Nevertheless, the Project could result in maximum excavation depths of up to approximately 40 feet below existing grade. Therefore, further evaluation of the Project's potential impacts, related to disturbing previously undiscovered archaeological resources or historical resources that would include a South Central Coastal Information Center (SCCIC) and California Historical Resources Information System (CHRIS) records search will be included in the EIR.

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

Less Than Significant Impact. The Project Site is located in an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. Nevertheless, as the Project would result in maximum excavation depths of up to approximately 40 feet below existing grade, which would be greater than those that have previously occurred on site, the potential exists to uncover existing but undiscovered human remains. If human remains were discovered during construction of the Project, work in the immediate vicinity of the construction area would be halted, and the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), which 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 which shall identify the person or persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant 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 statutory and regulatory requirements described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, the Project's impact related to

[42] SurveyLA, Hollywood Historic Districts, Planning Districts and Multi-Property Resources, November 2015, p. 390.

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

VI. ENERGY

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

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

Potentially Significant Impact. The Project may generate an increased demand for electricity and natural gas services provided by the Los Angeles Department of Water and Power (LADWP) and the Southern California Gas Company, respectively, compared to existing conditions. While development of the Project would not be anticipated to cause wasteful, inefficient, and unnecessary consumption of energy resources due to compliance with existing regulations, further evaluation of the Project's demand on existing energy resources will be included in the EIR.

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

Potentially Significant Impact. First established in 2002 under SB 1078, California's Renewables Portfolio Standard (RPS) is one of the most ambitious renewable energy standards in the country. The RPS program requires all electric load serving entities to procure 60 percent of its electricity portfolio from eligible renewable energy resources by 2030.[43] The LADWP provides electrical service throughout the City. LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources.

Regarding energy efficiency, the California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction, system design, and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards

[43] CPUC, California Renewables Portfolio Standard (RPS) Program, www.cpuc.ca.gov/RPS_Overview/, accessed December 21, 2023.

(Title 24 standards) are the 2022 Title 24 standards, which became effective on January 1, 2023.[44] The 2022 Title 24 standards include efficiency improvements to the residential standards for attics, walls, water heating, and lighting and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1 2013 national standards.[45]

As previously described, the Project Site is currently developed with studio support services and commercial uses, as well as a parking garage and surface parking areas. The Project Site does not include any renewable energy sources used by LADWP. The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. While the Project would not be anticipated to conflict with or obstruct a state or local plan for renewable energy or energy efficiency, further evaluation of the Project's compliance with LADWP's plans for renewable energy, as well as the Project's compliance with California Building Energy Efficiency Standards, will be included in the EIR.

VII. GEOLOGY AND SOILS

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

[44] CEC, 2022 Building Energy Efficiency Standards, 2022 Building Energy Efficiency Standards (ca.gov), accessed December 21, 2023.

[45] CEC, 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, December 2018.

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

The following analysis is based on the Geotechnical Engineering Investigations (Geotechnical Investigations) prepared for the Project by Geotechnologies, Inc., dated November 2, 2023, and included as Appendix 2.1 and Appendix 2.2 of this Initial Study. All specific information on geology and soils conditions on the Project Site in the discussion below is based on the Geotechnical Investigations unless otherwise noted.

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 that have shown evidence of movement within the past 11,700 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement within the last 1.6 million years. In addition, buried thrust faults, which are faults with no surface exposure, may exist in the vicinity of the Project Site; however, due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

CGS establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 feet to 500 feet on each side of a known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an

Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

Based on City data, the Project Site is not located within a City-designated Fault Rupture Study Area or an Alquist-Priolo Earthquake Fault Zone as mapped by CGS.[46] The closest fault zone is associated with the Hollywood Fault and is located approximately 0.8 mile north of the Project Site. Therefore, no active faults are known to pass directly beneath the Project Site, and the potential for surface rupture due to faulting occurring beneath the Project Site is considered low. Thus, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death related to bringing development and people into an area affected by fault rupture. Impacts associated with surface rupture from a known earthquake fault would be less than significant, and 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 Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. As previously stated, the closest fault zone is associated with the Hollywood Fault, which is located approximately 0.8 mile north of the Project Site.[47] As discussed in the Geotechnical Investigations, while the Project Site is subject to moderate to strong ground shaking in the event of an earthquake, this hazard is common in Southern California and the effects of ground shaking can be addressed by proper engineering design and construction in conformance with current building codes and engineering practices. State and local code requirements ensure that buildings are designed and constructed in a manner that would reduce the substantial risk of collapse during a major earthquake, although the buildings may sustain damage. Specifically, the State and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Faulting Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the California Building Code, the City's General Plan Safety Element, and the Los Angeles Building Code. Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction of the Project. Accordingly, the design and construction of the Project would comply with all applicable existing regulatory requirements, the applicable provisions of the Los Angeles Building Code relating to seismic safety, and the application of accepted and proven construction engineering practices, including the specific geotechnical design recommendations set forth for the Project in the Geotechnical Reports.

Specifically, the Project would comply with the Los Angeles Building Code (LABC), which incorporates current seismic design provisions of the California Building Code, with City amendments, to minimize seismic impacts. The California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction

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[46] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5533-015-018, -019, and 5533-020-023, http://zimas.lacity.org/, accessed December 21, 2023.

[47] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5533-015-018, -019, and 5533-020-023, http://zimas.lacity.org/, accessed December 21, 2023.

Program to mitigate losses from an earthquake and maximize earthquake safety. Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the LABC, and the Project would be required to comply with the plan review and permitting requirements of the LADBS, including the recommendations provided in the Geotechnical Investigations for the Project, which would be subject to review and approval by the LADBS. Through compliance with regulatory requirements and the site-specific geotechnical recommendations contained in the Geotechnical Investigations, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death related to bringing development and people into an area affected by strong seismic ground shaking. Thus, impacts related to strong seismic ground shaking would be less than significant, and no further evaluation of this topic is an EIR is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction potential is greatest where the groundwater level is shallow, and submerged loose, fine sands occur within a depth of about 50 feet or less. Liquefaction potential decreases as grain size and clay and gravel content increase. As ground acceleration and shaking duration increase during an earthquake, liquefaction potential increases. The Project Site is not located within an area identified by the City of Los Angeles or California Geological Survey as having a potential for liquefaction.[48,49]

As described in the Geotechnical Investigations, a site-specific liquefaction analysis was performed following the Recommended Procedures for Implementation of the California Geologic Survey Special Publication 117A, Guidelines for Analyzing and Mitigation Seismic Hazards in California (CGS, 2008), and the EERI Monograph (MNO-12) by Idriss and Boulanger (2008). This semi-empirical method is based on a correlation between measured values of Standard Penetration Test (SPT) resistance and field performance data. Based on the results of the site-specific liquefaction analysis, the potential for liquefaction at the Project Site is considered remote. Therefore, the Project would not exacerbate existing conditions related to bringing development and people into an area affected by liquefaction, and with adherence to existing regulations and site-specific design recommendations contained in the Geotechnical Investigations, impacts related to liquefaction 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. Given the largely impervious (developed/paved) nature of the Project Site, large areas of exposed soil or rocks that could slide or become loose are not present. In addition, the Project Site is not located in a landslide area as mapped by the State, nor is the Project Site mapped as a landslide area by the City of Los Angeles.[50,51,52] Therefore, the Project

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48 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5533-015-018, -019, and 5533-020-023, http://zimas.lacity.org/, accessed December 21, 2023.

49 California Geological Survey, Earthquake Zones of Required Investigation, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed December 21, 2023.

50 Ibid.

would not directly or indirectly cause or exacerbate potential substantial adverse effects involving landslides. As such, no impact would occur, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Development of the Project would require grading, excavation, and other construction activities that have the potential to disturb existing soils within the Project Site and expose these soils to rainfall and wind during construction, thereby potentially resulting in soil erosion. It is estimated that approximately 220,000 cubic yards of export would be hauled from the Project Site. 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 erosion and runoff. However, in accordance with the requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) adhering to the California Stormwater Quality Association Best Management Practices (BMP) Handbook. The SWPPP would set forth BMPs to be used during construction to manage and control stormwater and non-stormwater discharges, including, but not limited to, erosion control and sediment control with sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize erosion and the discharge of pollutants in stormwater runoff during construction. Additionally, all grading activities would require grading permits from the City of Los Angeles Department of Building and Safety (LADBS), which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. On-site grading and site preparation would also be required to comply with all applicable provisions of LAMC Chapter IX, Article 1, which addresses grading, excavations, and fills. Furthermore, during operations, the Project would be required to comply with the City's Low Impact Development (LID) ordinance[53] and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Regarding soil erosion during Project operations, the potential for erosion would be low since the Project Site would be fully developed and no soils would be left exposed. Therefore, with compliance with applicable regulatory requirements, the Project's potential impacts due to soil erosion or the loss of topsoil would be less than significant, and no further evaluation of this topic in an EIR is required.

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

Potentially Significant Impact. As discussed above, the Project Site is not located in a landslide area as mapped by the State, nor is the Project Site mapped as a landslide area by the City. In

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51 City of Los Angeles, 2018 Local Hazard Mitigation Pan. West Los Angeles APC, Figure 11-12, Landslide Hazard Areas in the West Los Angeles APC, p. 11-13.

52 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5533-015-018, -019, and 5533-020-023, http://zimas.lacity.org/, accessed December 21, 2023.

53 City of Los Angeles Department of Public Works, Bureau of Sanitation, Watershed Protection Division, Planning and Land Development for Low Impact Development (LID), Part B: Planning Activities, 5th Edition, May 2016.

addition, the Project would not alter exposed soils on a hill, nor inject water into the soil upslope that could cause a landslide downhill. Therefore, no impact related to landslides would occur.

Liquefaction-related effects include lateral spreading. As indicated in the Geotechnical Investigations, the potential for lateral spreading would also be considered low. As such, the Project would not be located on a geologic unit or soil that is unstable, which could potentially result in lateral spreading. Impacts related to lateral spreading would be less than significant, and no further evaluation of this topic in an EIR is required.

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the rapid and intensive withdrawal of subterranean fluids such as groundwater or oil. Construction activities for the Project would include excavations to a maximum depth of 40 feet bgs for the two level subterranean parking garage on the South Block of the Project Site. As previously discussed, groundwater was encountered at depths between 12.3 and 22 feet bgs for the North Block and between 15.5 to 21.5 feet bgs for the South Block. In addition, historic high groundwater in the vicinity of the Project Site is approximately 20 feet bgs. Therefore, temporary dewatering may be required during the construction of the proposed subterranean parking garages. As such, further analysis of potential impacts with regard to subsidence will be provided in an EIR.

As described in the Geotechnical Investigations, a site-specific liquefaction analysis was performed following the Recommended Procedures for Implementation of the California Geologic Survey Special Publication 117A, Guidelines for Analyzing and Mitigation Seismic Hazards in California (CGS, 2008), and the EERI Monograph (MNO-12) by Idriss and Boulanger (2008). This semi-empirical method is based on a correlation between measured values of Standard Penetration Test (SPT) resistance and field performance data. Based on the results of the site-specific liquefaction analysis, the potential for liquefaction at the Project Site is considered remote. Therefore, the Project would not exacerbate existing conditions related to bringing development and people into an area affected by liquefaction, and with adherence to existing regulations and site-specific design recommendations contained in the Geotechnical Investigations, impacts associated with liquefaction would be less than significant, and no further evaluation of this topic in an EIR is required.

Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading. According to the Geotechnical Investigations, soils underlying the Project Site include soils that are firm to very stiff clays with occasional layers of dense to very dense silty and clayey sands. Therefore, due to the type and density of the soils underlying the Project Site, the Project Site soils would not be considered collapsible soils. As such, the Project would not be located on and or exacerbate a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in collapse. Impacts associated with collapsible soils would be less than significant, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. According to the Geotechnical Investigations, the on-site geological materials are in the low to high expansive

potential range for the North Block, and in the high expansive range for the South Block. As described in Section 3, Project Description, of this Initial Study, the Project would include grading and excavation for the subterranean parking levels, which could extend to a depth of 40 feet bgs. As such, through standard construction practices involving excavation activities and the associated removal of underlying soils as well as the subsequent use of engineered soils, any potential effects associated with expansive soils would be addressed. In addition, other specific requirements would be determined as part of review and approval of the site-specific design-level geotechnical investigation by LADBS, which would include reinforcement strategies for foundation design and slabs-on-grade. Thus, through removal of existing underlying soils as well as compliance with regulatory requirements, potential impacts associated with expansive soils would be less than significant. 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 wastewater disposal systems where sewers are not available for the disposal of wastewater?

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

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

Potentially Significant Impact. No unique geologic features are located on-site. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Although the Project Site has been previously graded and developed, the Project could require grading and excavation of the Project Site to maximum excavation depths of up to approximately 40 feet below existing grade, which could have the potential to disturb existing but undiscovered paleontological resources. Therefore, further evaluation of the Project's potential impacts to paleontological resources will be provided in the EIR.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

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

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

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

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

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☒	☐	☐	☐

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

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

Less Than Significant Impact.

Construction

Typical of construction activities for development projects, during demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners would be routinely used on the Project Site. However, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials, including, but not limited to the Resource Conservation and Recovery Act,[54] California Hazardous Waste Control Law[55], Federal and State Occupational Safety

[54] United States Environmental Protection Agency, Resource Conservation and Recovery Act (RCRA) Laws and Regulations, www.epa.gov/rcra, accessed December 21, 2023.

and Health Acts[56,57] SCAQMD rules,[58] and permits and associated conditions issued by LADBS. These existing regulations are aimed at the amount and type of hazardous materials used, accident prevention, protection from exposure to specific chemicals, and the proper storage and disposal of hazardous materials. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. Accordingly, Project construction activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials routinely transported, used, or disposed of during construction. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant and no further evaluation of this topic in the EIR is required.

Operation

Operation of the Project would involve the routine transport, use, and disposal of small quantities of potentially hazardous materials typical of those used in commercial uses, including cleaning products, paints, and those used for maintenance of landscaping. The studio uses, in particular, could involve the transport, use and disposal of hazardous materials such as paints, adhesives, aerosol spray paint, as well as other materials for production and set making, consistent with such activities currently occurring at other commercial and studio developments. However, as with Project construction, all such hazardous materials used on the Project Site during operation would be transported, used, stored, and disposed of in accordance with manufacturer's standards and all applicable federal, state, and local requirements, such as California Hazardous Waste Control Law,[59] Federal and California Occupational Safety and Health Acts[60,61] the Emergency Planning and Community Right-to-Know Act (Superfund Amendments and Reauthorization Act, Title III),[62] and Safe Drinking Water and Toxic Enforcement Act,[63] and Fire Code.[64] Therefore, with compliance with manufacturer's standards and all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during operation of the Project would be less than significant, and no further evaluation of this topic in the EIR is required.

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55 California Health and Safety Code, Division 20, Chapter 6.5 Hazardous Waste Control [25100-25259].

56 United States Department of Labor, Occupational Safety and Health Administration, OSH Act of 1970, www.osha.gov/laws-regs/oshact/completeoshact, accessed December 21, 2023.

57 State of California Department of Industrial Relations, California Division of Occupational Safety and Health, Cal/OSHA, www.dir.ca.gov/dosh/, accessed December 21, 2023.

58 South Coast Air Quality Management District, South Coast AQMD Rule Book.

59 California Health and Safety Code, Division 20, Chater 6.5 Hazardous Waste Control [25100-25259].

60 United States Department of Labor, Occupational Safety and Health Administration, OSH Act of 1970, www.osha.gov/laws-regs/oshact/completeoshact, accessed December 21, 2023.

61 State of California Department of Industrial Relations, California Division of Occupational Safety and Health, Cal/OSHA, www.dir.ca.gov/dosh/, accessed December 21, 2023.

62 United States Code, Chapter 116-Emergency Planning and Community Right-To-Know, www.govinfo.gov/content/pkg/USCODE-2019-title42/html/USCODE-2019-title42-chap116.htm, accessed December 21, 2023.

63 California Health and Safety Code, Division 20, Chapter 6.6 Safe Drinking Water and Toxic Enforcement Act of 1986 [25249.5-25249.14].

64 Ordinance No. 186,616, adopted by the City Council on May 24, 2020.

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?

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with studio support services and commercial uses, as well as a parking garage and surface parking areas. Given the age of the existing structures and the previous uses, asbestos containing materials (ACM), lead-based paints (LBP), and/or other recognized environmental conditions may be present on site. Therefore, further evaluation will be included in the EIR to determine the Project's potential impacts with respect to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

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?

Potentially Significant Impact. The nearest schools located in the vicinity of the Project Site include the Episcopal School of Los Angeles (0.2 mile north of the Project Site), Vine Street Elementary School (0.2 mile east of the Project Site), Vine Street Early Education Center (0.2 mile east of the Project Site), and Larchmont Charter School–Hollygrove (0.5 mile south of the Project Site). While the Project is not expected to involve hazardous emissions or handle acutely hazardous materials, substances, or waste, due to its proximity to schools, further evaluation of this topic will be included in the EIR.

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?

Potentially Significant Impact. Section 65962.5 of the California Government Code requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While Section 65962.5 refers to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of multiple agencies including the Department of Toxic Substances Control (DTSC), the State Water Resources Control Board (SWRCB), and CalEPA. The Project Site may appear on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. In addition, properties in the surrounding area have the potential to be listed on various environmental databases. Therefore, further evaluation of this issue will be included in the EIR.

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 two miles of an airport or within an airport planning area. The closest airport is the Hollywood—Burbank Airport, which is located approximately 7.5 miles north of the Project Site. Given the distance between the Project Site and this airport, the Project would not have the potential to result in a safety hazard or excessive noise for people residing or working near an airport. Therefore, no impact would occur, and no further evaluation of this topic in the EIR is required.

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

Less Than Significant Impact. According to the City General Plan Safety Element, California Government Code Section 65302(g)(1) specifies the need to plan for swift evacuation in the event of a fire or other emergency. In response, the City includes a wide range of physical environments and dramatic differences in population density based on the time of day or day of the week. To better accommodate the variety of evacuation scenarios, the City has developed a dynamic approach to evacuation response, one that can respond to different conditions. As specified in the City Emergency Operations Plan Evacuation Annex, "primary evacuation routes consist of the major interstates, highways, and primary arterials within the City and Los Angeles County."[65] However, in response to a more localized emergency, such as a hillside wildfire, the Los Angeles Fire Department (LAFD) works in coordination with the Los Angeles Department of Transportation (LADOT) and Los Angeles Police Department (LAPD) to identify the most appropriate local egress option and direct individuals to those routes. Other routes are shared in real time depending on which disaster and suitable evacuation routes are identified.[66] While it is expected that the majority of construction activities for the Project would be confined to the Project Site, off site construction activities would occur in adjacent street rights-of-way, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would remain open such that at least one travel lane in each direction would be available. In the event of an emergency during construction of the Project, the LAFD and the LAPD would instruct businesses and residents of the area as to the specific evacuation plan as set forth in the Safety Element. The Applicant and construction contractor would comply with all instructions of the LAFD and LAPD as to evacuation requirements. In addition, while operation of the Project would generate traffic in the Project Site vicinity and would result in some modifications to the Project Site's access, the Project would comply with LAFD access requirements and would not impede emergency access in the Project Site vicinity. Therefore, the Project would not physically interfere with or impair the implementation of an emergency evacuation plan. As such, impacts would be less than significant, and no further evaluation of this topic in the EIR is required.

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

Less Than Significant Impact. The Project Site is located in an urbanized, generally flat area, and there are no wildlands or steep slopes located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone, nor is it located within a City-designated fire buffer zone.[67,68] Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. In particular, LAMC Section 57.106.5.2 provides that the Fire Chief shall have the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; LAMC Section 57.118 establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new

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65 City of Los Angeles Emergency Operations Plan, Evacuation Functional Support Annex, October 2020.

66 Los Angeles Safety Element, November 2021, p. 23.

67 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5164-010-003; -004; -005 http://zimas.lacity.org/, accessed December 21, 2023.

68 City of Los Angeles, 2018 Local Hazard Mitigation Plan, Central APC, Figure 13-2, Wildlife Severity Zones, p. 13-4.

construction projects; and LAMC Section 57.507.3.1 establishes fire water flow standards. In addition, the Project's proposed studio and commercial uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, the Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death as a result of exposure to wildland fires. As such, impacts would be less than significant, and no further evaluation of this topic in the EIR is required.

X. HYDROLOGY AND WATER QUALITY

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

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

Potentially Significant Impact. Project construction activities would have the potential to convey pollutants into municipal storm drains, particularly during precipitation events. In addition, potential changes in on-site drainage patterns resulting from Project implementation and the introduction of new land uses could affect the quality of stormwater runoff. Therefore, further analysis of potential impacts will be included in the EIR.

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?

Potentially Significant Impact. A significant impact may occur if a project includes deep excavations which have the potential to interfere with groundwater movement or includes the withdrawal of groundwater or paving of existing permeable surfaces that are important to groundwater recharge. Because the Project Site is currently developed and contains mostly impervious surfaces, reductions to existing groundwater recharge are not anticipated as a result of Project implementation. During a storm event, stormwater runoff would continue to flow to the adjacent roadways where it would be directed into the City's storm drain system. As such, the Project Site is not a source of groundwater recharge. Following redevelopment of the Project Site, groundwater recharge would remain negligible, similar to existing conditions.

Construction activities for the Project would include excavations to a maximum depth of 40 feet bgs for the two level subterranean parking garage on the South Block of the Project Site. As previously discussed, groundwater was encountered at depths between 12.3 and 22 feet bgs for the North Block and between 15.5 to 21.5 feet bgs for the South Block. In addition, historic high groundwater in the vicinity of the Project Site is approximately 20 feet bgs. Therefore, temporary dewatering may be required during the construction of the proposed subterranean parking garages. As such, further analysis of potential impacts will be provided in an EIR.

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;

Potentially Significant Impact. As discussed in Response to Checklist Question VII.b., potential erosion impacts resulting from Project grading, excavation, and other construction activities that have the potential to disturb existing soils would be adequately reduced through compliance with LADBS grading permits, LAMC requirements, and the City's LID ordinance. However, given the potential for changes to existing drainage patterns on-site as a result of Project development, the Project would have a potentially significant impact on erosion and siltation in the context of potential hydrological changes on-site. As such, further analysis of potential impacts will be provided in an EIR.

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

Potentially Significant Impact. Potential changes in drainage patterns on-site could affect the rate or amount of surface water runoff on-site in a manner that could result in flooding on- or off-site. Thus, further analysis of potential impacts will be included in an EIR.

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

Potentially Significant Impact. Potential changes in drainage patterns on-site could create or contribute runoff which could exceed the capacity of the local stormwater drain system, and Project construction activities as well as the introduction of new land uses could provide additional sources of polluted runoff. Therefore, further analysis of potential impacts will be included in an EIR.

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.[69,70] Thus, the Project would not impede or redirect flood flows. No impacts would occur, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed immediately above, the Project Site is not located within a 100-year flood hazard area as mapped by FEMA or by the City. In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a tsunami hazard area.[71] Therefore, no tsunami or tsunami events would be expected to impact the Project Site and cause any discharge of pollutants. Additionally, there are no standing bodies of water near the Project Site that may experience a seiche, and therefore there is no significant risk that flows from a seiche could result in the discharge of any pollutants from the Project Site caused by the Project.

Earthquake-induced flooding can result from the failure of dams or other water-retaining structures resulting from earthquakes. According to the General Plan's Safety Element, the Project Site is not located within a flood impact zone.[72] However, the Project Site is mapped within an inundation area for the Hollywood Reservoir, which is held by the Mulholland Dam.[73] The Mulholland Dam is a LADWP dam located in the Hollywood Hills approximately two miles north of the Project Site. Although the Project Site is mapped within an inundation zone for the dam, catastrophic failure of this

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69 Federal Emergency Management Agency, Flood Insurance Rate Maps, Panel Numbers 06037C1605F, effective September 26, 2008.

70 City of Los Angeles 2018 Local Hazard Mitigation Plan, Figure 10-1, Mapped Flood Hazard Areas in Central APC, p. 10-8.

71 California Department of Conservation, Los Angeles County Tsunami Hazard Areas, www.conservation.ca.gov/cgs/tsunami/maps/los-angeles, accessed December 21, 2023.

72 Los Angeles General Plan Safety Element, November 1996, Exhibit G, Inundation & Tsunami Hazard Areas, p. 59.

73 California Department of Water Resources, Division of Safety of Dams, Dam Breach Inundation Map Web Publisher, https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2, accessed December 21, 2023.

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 the Department of Water Resources. 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, therefore, 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.

Considering the above information and risk reduction projects, the risk of flooding from a tsunami, inundation by a seiche, or dam failure is considered low. 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 or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. Under Section 303(d) of the Clean Water Act, states are required to identify water bodies that do not meet their water quality standards. Biennially, the LARWQCB prepares a list of impaired waterbodies in that region, referred to as the 303(d) list. The 303(d) list outlines the impaired waterbody and the specific pollutant(s) for which it is impaired. All waterbodies on the 3030(d) list are subject to the development of a Total Maximum Daily Load (TMDL). The Project Site lies within the Ballona Creek Watershed. According to the State Water Resources Control Board (SWRCB), constituents of concern listed for Ballona Creek under Clean Water Act Section 303(d) List include trash, toxic pollutants (cyanide), bacteria and viruses, metals (lead, copper, zinc), and sediment.[74]

The County of Los Angeles, the City of Los Angeles, and all other cities in the regional watershed are responsible for the implementation of watershed improvement plans or Enhanced Watershed Management Programs (EWMP) to improve water quality and assist in meeting the TMDL milestones. The objective of the EWMP Plan for the Ballona Creek is to determine the control measures (often referred to as best management practices [BMPs]) that will achieve required pollutant reductions while also providing multiple benefits to the community and leveraging sustainable green infrastructure practices. Compliance with the NPDES program would ensure that stormwater pollutants do not substantially degrade water quality. Further, the Project would be required to comply with the City's Standard Urban Stormwater Mitigation Plan (SUSMP) requirements,

The Project Site is also located in the Coastal Plain of Los Angeles Groundwater Basin, Hollywood Subbasin. This subbasin is listed as very low priority by the California Department of Water Resources and thus is not subject to a groundwater sustainability plan (GSP) or management by a groundwater sustainability agency (GSA) per the Sustainable Groundwater Management Act (SGMA).[75,76]

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[74] California Environmental Protection Agency, State Water Resources Control Board, Impaired Water Bodies, www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2014_2016.shtml?wbid=CAT405170002000030110195l, accessed October 11, 2023.

[75] California Department of Water Resources, SGMA Basin Prioritization Dashboard, https://gis.water.ca.gov/app/bp-dashboard/final, accessed October 11, 2023.

Potential pollutants generated by the Project would be typical of studio and related commercial land uses and may include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. The implementation of BMPs required by the City's LID Ordinance would target these pollutants to minimize pollutant loads in stormwater runoff. Implementation of LID features as part of the Project could result in an improvement in surface water quality runoff as compared to existing conditions. As such, the Project would not introduce new pollutants or an increase in pollutants that would conflict with or obstruct any water quality control plans for the Ballona Creek Watershed. By complying with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

XI. LAND USE AND PLANNING

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

a. Would the project physically divide an established community?

Less Than Significant Impact. The Project Site is located within the highly urbanized Hollywood Community Plan area and is currently developed with studio support services and commercial uses, as well as a parking garage and surface parking areas. The Project Site does not currently contain residential uses. The area surrounding the Project Site is highly urbanized and includes a mix of low- to mid-rise buildings containing a variety of industrial, commercial, and residential uses. The surrounding properties are generally zoned MR1, which is consistent with the zoning of the Project Site. The Project would construct 452,747 square feet of new soundstages and associated production uses, office, retail, and restaurant uses, and renovate 108,197 square feet of existing structures into office space. These uses would be consistent with other commercial developments located adjacent to and in the vicinity of the Project Site. All proposed development would occur within the boundaries of the Project Site, and the Project would not require the vacation of any surrounding streets adjacent to the Project Site. Furthermore, the Project does not propose a freeway or other large infrastructure that could divide the existing surrounding community. Access to all surrounding properties would continue to be available upon buildout of the Project. Therefore, the Project would not physically

[76] California Department of Water Resources, Basin Prioritization, https://water.ca.gov/Programs/Groundwater-Management/Basin-Prioritization, accessed October 11, 2023.

divide an established community. Impacts related to the physical division of an established community would be less than significant, and no further evaluation of this topic in an EIR is required.

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

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project requires several discretionary approvals. Additionally, the Project could potentially conflict with land use plans, policies, or regulations that were adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, further evaluation of this topic in an EIR is required.

XII. MINERAL RESOURCES

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

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

No Impact. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone or Surface Mining District where significant mineral deposits are known to be present or within a mineral producing area as classified by the California Geologic Survey.[77,78] The Project Site is also not located within a City-designated oil field or oil drilling area.[79] Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. No impact would occur, and no further evaluation of this topic in an EIR is required.

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

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77 City of Los Angeles, Conservation Element of the City of Los Angeles General Plan. Exhibit A, Mineral Resources.

78 State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2018.

79 California Department of Conservation, Geologic Energy Management Division, Well Finder, https://maps.conservation.ca.gov/doggr/wellfinder/#openModal, accessed December 21, 2023.

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

XIII. NOISE

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

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

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

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

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

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

No Impact. The Project Site is not located within the vicinity of a private airstrip or airport land use plan. The closest private airstrip or airport is the Hollywood—Burbank Airport, which is located approximately 7.5 miles north of the Project Site. Given the distance between the Project Site and the nearest airport, the Project would not expose people residing or working in the Project area to excessive noise levels. Therefore, no impact would occur, and no further evaluation of this topic is required.

XIV. POPULATION AND HOUSING

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

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

Less Than Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project does not include a housing component. Therefore, the Project would not directly introduce a new residential population that contributes 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 during which their specific skills are needed to complete a particular phase of the construction process. The Project would likely draw the majority of its construction workers from the existing regional pool of construction workers who typically move from project to project as work is available. Project-related construction workers would not be anticipated to relocate their households' permanent places of residence as a consequence of working on the Project and, therefore, a substantial number of new permanent residents are not expected to be generated during construction of the Project. Accordingly, Project construction would not induce substantial population growth.

As discussed in Section 3, Project Description, of this Initial Study, the Project proposes to construct 452,747 square feet of new soundstages, and associated production uses, office, retail, and restaurant uses, and to renovate 108,197 square feet of existing structures consisting of the renovation of existing production uses as well as the renovation of existing office and gymnasium into office space. Based on employee generation factors from the LADOT's Vehicle Miles Traveled Calculator, the Project is estimated to generate a net increase of approximately 1,655 new employees to the Project Site.[80,81] According to SCAG's 2020–2045 RTP/SCS, which includes SCAG's most current population and employment forecasts, the employment forecast for the City of Los Angeles Subregion in 2023 is approximately 1,917,721 employees.[82] In 2028, the projected buildout year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,967,307 employees.[83] Therefore, the projected employment growth in the City between 2023 and 2028 based on SCAG's 2020–2045 RTP/SCS is approximately 49,586 employees. Thus, the Project's estimated 1,657 net new employees would constitute 3.34 percent of the employment growth forecasted between 2023 and 2028.

While some new Project employees may be anticipated to relocate to the vicinity of the Project Site, many would not, nor would existing employees be expected to move as a result of redevelopment of the Project Site. Accordingly, the potential indirect increase in population would not be substantial. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project Site, and other employees would be expected to commute to the Project Site from other communities both in and outside of the City, as occurs under existing conditions. Therefore, given that the Project would not directly contribute to substantial population growth in the Project Site area through the development of residential uses and since some of the employment opportunities generated by the Project could be filled by people already residing in the vicinity of the Project Site or by others who would commute to the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Further, as the Project would be located in an urbanized area with an established network of roads and other urban

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80 LADOT and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. The employee generation rate 0.004 employee per square foot for "General Office" land use is applied to the 47,599 square feet of office space to be removed and 78,814 square feet of office to be renovated, the rate of 0.004 employee per square foot for "General Office" land use is applied to the 3,110 square feet of production uses to be renovated, the rate of 0.002 employee per square foot for "General Retail" land use is applied to the 3,834 square feet of retail uses to be removed, the rate of 0.001 employee per square foot for "Light Industrial" land use is applied to the 20,241 square feet of industrial uses to be removed, and the rate of 0.001 employee per square foot for "Health Club" land use is applied to the 9,972 square feet of dance studio uses and 26,273 square feet of gymnasium use to be removed. Currently, the existing uses produce approximately 582 employees.

81 LADOT and Los Angeles DCP, City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. The employee generation rate 0.004 employee per square foot for "General Office" land use is applied to the 447,385 square feet of new and renovated office space, the rate of 0.004 employee per square foot for "General Office" land use is applied to the 101,557 square feet of new and renovated production uses, the rate of 0.004 employee per square foot for "High-Turnover Sit-Down Restaurant" land use is applied to the 8,786 square feet of new restaurant uses, and the rate of 0.002 employee per square foot for "General Retail" land use is applied to the 3,216 square feet of new retail uses. The Project would generate approximately 2.237 new employees. Accounting for the existing uses, the Project would produce an estimated 1,655 net new employees.

82 Based on a linear interpolation of SCAG's 2016–2045 data, the 2023 values for employment are calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to each year until 2023.

83 Based on a linear interpolation of SCAG's 2016–2045 data, the 2028 values for employment are calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to each year until 2028.

infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth.

Based on the above, the Project would not induce substantial population growth either directly or indirectly. Impacts would be less than significant, and no 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. As no housing currently exists on the Project Site, the Project would not displace or cause the displacement of any existing persons or housing, or require the construction of replacement housing elsewhere. No impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

XV. PUBLIC SERVICES

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

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

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

Potentially Significant Impact. LAFD provides fire protection and emergency medical services for the Project Site. The Project would increase the floor area and associated occupancy on-site which could result in the need for additional fire protection services during Project operation. Additionally, construction activities have the potential to result in accidental on-site fires by exposing combustible materials to fire risks from machinery and equipment sparks, and from exposed electrical lines,

chemical reactions in combustible materials and coatings, and lighted cigarettes. Therefore, further evaluation of this topic will be provided 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 LAPD. The Project would increase the floor area and associated occupancy on-site which could result in the need for additional police services during Project operation. Additionally, construction sites can be sources of nuisances and hazards and can invite theft and vandalism. Therefore, further evaluation of this topic will be provided 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 LAUSD, which is divided into seven local districts.[84] The Project Site is located in District 4 and is served by Vine Street Elementary School, Hubert Howe Bancroft Middle School, and Fairfax Senior High School.[85,86]

Construction

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

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84 LAUSD, Board of Education Districts Maps 2022-2023, February 2023.

85 LAUSD, Board of Education Local District—West Map, July 2023.

86 LAUSD, Resident School Finder, https://rsi.lausd.net/ResidentSchoolIdentifier/, accessed December 21, 2023.

Operation

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

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

Less Than Significant Impact. Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. Nearby public parks and recreational facilities within an approximate 2-mile radius include the Hollywood Recreation Center (0.2 mile), De Longpre Park (0.56 mile), Selma Park (0.77 mile), Seily Rodriguez Park (0.92 mile), Carlton Way Park (1.0 mile), Yucca Park and Community Center (1.05 miles), Poinsettia Recreation Center (1.19 miles), Robert L. Burns Park (1.19 miles), Dorothy & Benjamin Smith Park (1.28 miles), La Mirada Park (1.33 miles), Lemon Grove Recreation Center (1.46 miles), Runyon Canyon Park (1.60 miles), Pan Pacific Park and Recreation Center (1.70 miles), and Wattles Garden Park (1.83 miles).[87]

Construction

Given the temporary nature of construction activities, construction of a project would not introduce a permanent population to an area which could result in an increase in the use of existing parks and recreational facilities that would result in the need for new parks and recreational facilities or the expansion of existing facilities. Additionally, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Additionally, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, which require construction workers to commute to job sites that change many times in the course of a year, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented

[87] Los Angeles Department of Recreation and Parks, Facility Map, Locator, www.laparks.org/maplocator?cat_id=All&geo[radius]=2&geo[latitude]=34.0890821&geo[longitude]=-118.3293502&address=6311%20Romaine%20St,%20Los%20Angeles,%20CA%2090038,%20USA, accessed November 28, 2023.

by the Project. Thus, construction of the Project would not generate a demand for park facilities that cannot be adequately accommodated by existing or planned facilities and services. Therefore, the construction workers associated with the Project would not result in a substantial increase in the residential population within the vicinity of the Project Site that would result in a corresponding permanent demand for parks in the vicinity of the Project Site. Impacts on parks during Project construction would be less than significant and no further evaluation of this topic in an EIR is required.

Operation

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

As discussed in Section 3, Project Description, of this Initial Study, although not required, the Project includes landscaping and open space elements that would be located throughout the Project Site on the ground floor areas and within the roof decks of the buildings and along the streetscape. The Project would include new landscaping such as street trees and shrubs along Santa Monica Boulevard, Cahuenga Boulevard, Cole Avenue, Romaine Street, and Willoughby Avenue. These perimeter areas would also include lighting, signage, outdoor seating, and short-term bicycle parking. The Project would provide 38,837 square feet of outdoor space on the ground floor of the North Block that could be used by the public, as well as 18,203 square feet of private space on the ground floor and on levels 4, 5, 6, and 7 that would only be accessible to the tenants of the office building. On the South Block, the project would provide one 13,193 square feet of private open space, but no public open space. The Project would also provide landscaped roof decks and terraces within the North Office Building, Building 4 Addition, Cole Bungalow, and South Office Building. The Project's on-site open space would help to offset the demand for off-site parks and recreational facilities that could occur from the Project's 1,655 net new employees. Thus, the Project would not result in the need for new or altered park facilities, or substantially increase the demand for parks. The Project's impacts on parks during Project operation would be less than significant, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Other public facilities provided to the Project Site include library services. The Los Angeles Public Library (LAPL) provides library services to the City through its

Central Library, 72 branch libraries, as well as through Web-based resources.[88] The Project area is served by existing LAPL facilities within the Central Hollywood Community Plan area, including the John C. Fremont Branch Library (0.36 mile southwest), Frances Howard Goldwyn Hollywood Regional Library (0.68 mile north), Will & Ariel Branch Library (1.06 miles northwest), Wilshire Branch Library (1.37 miles southeast), and Fairfax Branch Library (1.73 miles southeast).[89]

Construction

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

Operation

As previously discussed, the Project does not propose the development of residential uses; therefore, implementation of the Project would not result in a direct increase in the number of residents within the service population of the local LAPL facilities. Furthermore, some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site who would already be within the service population of the nearby libraries. Project employees living outside the vicinity of the Project Site would be more likely to use library services and facilities near their homes during non-work hours than library facilities near the Project Site. In addition, Project employees would have internet access to all LAPL and other web-based resources, which would decrease the demand on all library services and facilities. Therefore, the Project would generate a minimal indirect demand for library services and facilities, and impacts on library services and facilities during Project operation would be less than significant. No further evaluation of this topic in an EIR is required.

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

89 Los Angeles Public Library, Branch Map, https://lapl.org/branches?distance%5Bpostal_code%5D=90021&distance%5Bsearch_distance%5D=3&distance%5Bsearch_units%5D=mile, accessed December 21, 2023.

XVI. RECREATION

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

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

Less Than Significant Impact. As discussed above in response to checklist question XV.d, there are numerous public parks and recreational facilities within 2 miles of the Project Site. The closest major park to the Project Site is the Hollywood Recreation Center, located adjacently north of the Project Site. The Hollywood Recreation Center includes a children's play area, baseball field, basketball courts, an outdoor pool, an auditorium, and a compact green space area.

Construction

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

Operation

As previously described, the Project does not propose the development of residential uses. While it is possible that some of the Project's new employees may utilize local parks and recreational facilities, this increased demand would be negligible due to the amount of time required for employees to access off-site local parks and recreational facilities. Furthermore, 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, 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. Thus, impacts would be less than significant, and 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?

Less Than Significant Impact. The Project would not include the construction of recreational facilities or require the expansion of recreational facilities, as discussed above in Response Checklist Question XV.d. Thus, impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

XVII. TRANSPORTATION

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

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

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

- If the project is estimated to generate a net increase of 250 or more daily vehicle trips and requires discretionary action, a transportation assessment for a Development Project is required.

- If a project is likely to either: (1) induce additional vehicle miles traveled by increasing vehicle capacity; or (2) reduce roadway through-lane capacity on a street that exceeds 750 vehicles per hour per lane for at least two (2) consecutive hours in a 24-hour period after the project is completed, a transportation assessment is generally required.

- A transportation assessment is required by City ordinance or regulation.

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

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

Potentially Significant Impact. SB 743, which went into effect in January 2014, required 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 VMT is the most appropriate measure of transportation impacts under CEQA, replacing LOS.

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

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

Less Than Significant Impact. The Project's design does not include hazardous geometric design features (e.g., sharp curves or dangerous intersections). The roadways adjacent to the Project Site are part of the existing urban roadway network and contain no sharp curves or dangerous intersections, and the development of the Project would not result in roadway modifications that would introduce safety hazards adjacent to the Project Site. In addition, the proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access such that the proposed driveways would not create hazards to the surrounding streets. The proposed

uses would also be consistent with the surrounding uses (i.e., industrial, commercial, and residential) and would not introduce hazards due to incompatible uses. Thus, the Project would not substantially increase hazards due to a geometric design feature or incompatible uses. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

d. Would the project result in inadequate emergency access?

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

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

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

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and

that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Potentially Significant Impact (a and b). Assembly Bill (AB) 52 established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in PRC Section 21074. As specified by AB 52, a lead agency must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. In compliance with AB 52, the City mailed a project notification letter to all applicable tribes on January 9,2024.

As previously discussed, the Project could require maximum excavations that extend approximately 40 feet below ground surface. As such, construction activities could potentially disturb any existing but undiscovered tribal cultural resources. Therefore, the potential exists for the Project to impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. Further analysis of this topic will be provided in the EIR.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☒	☐	☐	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☒	☐	☐	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☒	☐	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

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

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

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

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

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

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

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

Less Than Significant Impact. While the Los Angeles Sanitation and Environment (LASAN) generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-

family residential, commercial, and institutional developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within Los Angeles County are categorized as either Class III (e.g., landfills permitted to accept non-hazardous and non-designated solid waste) or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, is generally disposed of in inert waste landfills.[90] Ten permitted Class III landfills and one permitted inert landfill are currently operating within the County.[91] In addition, there is one solid waste transformation facility within Los Angeles County (Southeast Resource Recovery Facility) that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery.[92]

Based on the 2020 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the most recent report available, the total remaining permitted Class III landfill capacity in the County is estimated at approximately 142.67 million tons, with a total estimated daily disposal rate of 36,544 tons per day, and the remaining lifespan of each landfill ranges from eight to 35 years.[93] The estimated remaining capacity for the County's Class III landfills open to the City is approximately 140.25 million tons as of December 31, 2020.[94] In addition, the permitted inert waste landfill serving the County is Azusa Land Reclamation.[95] This facility has 64.64 million tons of remaining capacity and an average daily in-County disposal rate of 1,032 tons per day.[96] Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the CoIWMP Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.[97]

The Project would comply with all applicable federal, state, and local requirements concerning disposal 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. In the event

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90 Inert waste is waste which is neither chemically nor biologically reactive and will not decompose. Examples include sand and concrete.

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

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

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

94 Total excludes Class III landfills not open to the City of Los Angeles for disposal (i.e., Burbank, Pebbly Beach, and San Clemente) according to the Los Angeles Solid Waste Information Management System, 2021 Waste Disposal Summary Report for City of Los Angeles.

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

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

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

any of the soils excavated during Project construction were determined to be contaminated and would be exported off site, the Project would utilize SoilSafe, a soil reclamation located in Adelanto, California.[98]

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

Construction

As previously discussed, the Project would construct 456,015 square feet of new soundstages, production studios and associated production uses, office, retail, and restaurant uses, and renovate 108,197 square feet of existing structures consisting of the renovation of existing production uses as well as the renovation of existing office and gymnasium uses into office space. As summarized in Table 3 on page 84, to provide for the proposed improvements, the Project would demolish 81,646 square feet of floor area of existing office, industrial, production, retail and dance studio uses, as well as a six-level, above-ground parking structure and surface parking areas. Pursuant to the requirements of SB 1374,[99] the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of its non-hazardous demolition and construction debris. In addition, pursuant to LAMC Sections 66.32.1 through 66.32.5 (Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. As discussed above, non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, is disposed of in inert waste landfills. Thus, although the total diversion rate may ultimately exceed 75 percent, this analysis conservatively assumes a diversion rate of 75 percent.

Based on construction and debris rates established by the U.S. Environmental Protection Agency (USEPA) and after accounting for mandatory recycling, as shown in Table 3, the Project would result in approximately 2,291 tons of construction and demolition waste. Given the remaining permitted capacity at the Azusa Land Reclamation facility, which is approximately 64.64 million tons, as well as the remaining 140.25 million tons of capacity at the Class III landfills serving the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction-related solid waste disposal needs. Specifically, the Project's estimated one-time disposal need of an estimated 2,291 tons of construction-related waste represents approximately 0.004 percent of the remaining capacity (64.64 million tons) at the Azusa Land Reclamation facility and 0.002 percent of the remaining capacity (132.58 million tons) at the Class III landfills serving the City.[100]

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98 SoilSafe is a soil reclamation facility, not a landfill facility. Based on oral and written communication on October 18, 2023 with Joe Provansal, Customer Service Manager, at SoilSafe, after the soils are treated and subsequently tested to meet levels acceptable under the issued California Regional Water Quality Control Board, Lahontan Region Permit and Mojave Desert Air Quality Management District Permit the soils are then reused and therefore, SoilSafe does not have ongoing capacity issues similar to a Class III landfill.

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

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

Table 3
Estimated Project Construction and Demolition Waste Generation and Disposal

Land Use	Size	Generation Rate (lbs/sf)[a]	Total (tons)[b]
Demolition Waste			
Existing Buildings to Be Removed	81,646 sf	155	6,328
Parking Structure	4,872.5 CY	—	1,016
Surface Parking Lot[c]	3,503.5 CY	—	730
Demolition Waste Subtotal			*8,074*
Construction Waste			
Office[e]	447,385 sf	3.89	870
Production	101,557 sf	3.89	198
Restaurant	8,786 sf	3.89	17
Retail	3,216 sf	3.89	6
Construction Waste Subtotal			*1,091*
Total for Demolition and Construction Waste			***9,165***
Total After 75-Percent Recycling			**2,291**

lbs = pound

sf = square feet

CY = cubic yards

[a] *U.S. Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 4 and Table 6. Generation rates used in this analysis are based on an average of various non-residential building types. Numbers may not add up exactly due to rounding.*

[b] *One ton is equal to approximately 2,000 pounds.*

[c] *CalEEMod Users Guide, Appendix A, May 2021, p. 13.*

[d] *Contra Costa County, California, Volume to Weight Conversion Table for Construction and Demolition Debris. The rate of 0.2085 tons per one cubic yard. To convert the 131,559 sf existing parking structure and 94,596 sf existing surface parking lot, a depth on one foot construction and demolition debris was assumed resulting in 4,872.5 CY and 3,503.5 CY, respectively.*

[e] *Includes new floor area to be constructed and existing floor area to be renovated.*

Source: Eyestone Environmental, 2023.

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

Operation

As shown in Table 4 on page 86, upon full buildout, the Project would generate approximately 329 net tons of solid waste per year. While this estimate accounts for recycling and other waste diversion measures consistent with the Citywide diversion rate of 76.4 percent, it does not include implementation of the City's Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.[101] The Project's estimated net increase of 329 tons per year for solid waste disposal represents approximately 0.0002 percent of the remaining capacity (132.58 million tons) at the Class III landfills serving the City.[102]

As previously discussed, 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 of Los Angeles continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning directives. These efforts, together with countywide and regional programs implemented by the County and the cities, acting in concert or independently, have achieved significant, measurable results, as documented in the 2020 Annual Report. The Project would be consistent with and would further City policies that reduce landfill waste streams. Such policies and programs serve to implement the strategies outlined in the 2020 Annual Report to adequately meet future countywide disposal needs without capacity shortages.

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste generated by construction and operation of the Project. Therefore, the Project's impacts related to solid waste generation 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 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

[101] City of Los Angeles Bureau of Sanitation, Solid Waste Integrated Resources Plan—A Zero Waste Master Plan, October 2013.

[102] (329 tons per year ÷ 132.58 million tons) * 100 = 0.0002 percent.

Table 4
Estimated Project Operational Solid Waste Generation and Disposal

Building	Size	Employee Generation Rate per sf[a]	Estimated No. of Employees	Solid Waste Generation Rate[b]	Total Generation (tons/year)
Existing Uses					
Office to Be Removed	47,599 sf	0.004	191 emp	1.18 tn/emp/yr	225
Office to Be Renovated	78,814 sf	0.004	315 emp	1.18 tn/emp/yr	372
Production to Be Renovated	3,110 sf	0.004	12 emp	1.09 tn/emp/yr	14
Retail to Be Removed	3,834 sf	0.002	8 emp	1.96 tn/emp/yr	15
Industrial to Be Removed	20,241 sf	0.001	20 emp	1.09 tn/emp/yr	22
Dance Studio to Be Removed	9,972 sf	0.001	10 emp	2.3 tn/emp/yr	23
Gymnasium to Be Removed[c]	26,273 sf	0.001	26 emp	1.05 tn/emp/yr	60
Total Existing					*731*
Proposed Uses					
Office[c]	447,385 sf	0.004	1,789 emp	1.18 tn/emp/yr	1,616
Production	101,557 sf	0.004	406 emp	1.09 tn/emp/yr	429
Restaurant	8,786 sf	0.004	35 emp	1.92 tn/emp/yr	67
Retail	3,216 sf	0.002	6 emp	1.96 tn/emp/yr	13
Total Project					*2,125*
Total Net Increase					**1,394**
Total Net Disposal (After 76.4-Percent Diversion)[d]					**329**

emp = employee

sf = square feet

tn/emp/yr = tons per employee per year

[a] *Project employee generation rates from Los Angeles Departments of Transportation and City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. Assumes general office rate for production, restaurant, and general office, and light industrial rate for industrial to be removed, dance studio to be removed, and gymnasium to be removed.*

[b] *Solid waste generation rates from CalRecycle 2014 Waste Characterization Study.*

[c] *Includes 26,273 square feet of existing gymnasium uses would be renovated to offices uses at project buildout.*

[d] *The Zero Waste Progress Report 2013 conducted by the UCLA Engineering Extension's Municipal Solid Waste Management Program reported that the City of Los Angeles has achieved a recycling rate of 76.4 percent.*

Source: Eyestone Environmental, 2023.

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.[103] The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste[104] 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.[105] The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling, as well as the City of Los Angeles Bureau of Sanitation Blue Bin Recycling Program.[106] In addition, as discussed above, pursuant to the requirements of SB 1374,[107] the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of its non-hazardous demolition and construction debris, and pursuant to LAMC Sections 66.32.1 through 66.32.5 (the City's Construction and Demolition Waste Recycling Ordinance No. 181,519), the Project's general contractor and/or subcontractors would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. Since the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste, impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

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[103] City of Los Angeles, RENEW LA Five-Year Milestone Report, June 2011.

[104] 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.

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

[106] City of Los Angeles Bureau of Sanitation, Blue Bin Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-rybb?_afrLoop=5296551634977190&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=bghkbdldv_78#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D5296551634977190%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dbghkbdldv_82, accessed April 19, 2023.

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

XX. WILDFIRE

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

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

No Impact. As discussed above, the Project Site has relatively flat topography, is currently developed with urban uses and is located in an urbanized area. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone.[108,109] Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones and would not result in impacts related to impairing an adopted emergency response plan or emergency evacuation plan within a wildfire area. No impacts regarding wildfire risks or related post-fire conditions would occur, and no further evaluation of this topic in the EIR is required.

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

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[108] City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5533-015-018, -019, and 5533-020-023, http://zimas.lacity.org/, accessed December 21, 2023.

[109] City of Los Angeles, 2018 Local Hazard Mitigation Plan, Central APC, Figure 13-2, Wildfire Severity Zones, p. 13-4.

No Impact. As discussed above, the Project Site is relatively flat and is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated fire buffer zone. In addition, as is also discussed above, the Project Site is a fully developed urban infill site that is currently 90 percent impervious; therefore, there is neither any accumulation of dry vegetation within the Project Site to fuel wildfires, nor are there wildlands or steep slopes located in the vicinity of the Project Site such that frequent strong wind events could exacerbate wildfires. Therefore, as the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones and due to the flat topography of the Project Site and surrounding area, the Project would not result in impacts related to exacerbating wildfire risks. No impacts regarding wildfire risks or related post-fire conditions would occur, and no further evaluation of this topic in the EIR is required.

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

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

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

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

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

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

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

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; hazards and hazardous materials; hydrology and water quality (water quality, groundwater supplies, erosion/siltation, and runoff); land use and planning (potential conflicts with land use plans, etc.); noise; public services (police protection, fire protection); transportation; tribal cultural resources; and utilities (water supply, wastewater, 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. There may be other current and reasonably foreseeable projects located in the vicinity of the Project Site, the development of which, in conjunction with the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in the EIR for the following subject areas: air quality; cultural resources; energy; geology and soils (paleontological resources); greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality (water quality, groundwater supplies, erosion/siltation, and runoff); land use and planning (potential conflicts with land use plans, etc.); noise; public services (police protection, fire protection); transportation; tribal cultural resources; and utilities (water supply, wastewater, and energy infrastructure).

However, Project would not contribute to cumulative impacts with regard to the following topics, which were determined to be *less than significant* in this Initial Study:

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

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

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

- **Biological Resources**—As it relates to biological resources, the Project vicinity is highly urbanized, and similar to the Project, other developments occurring in the vicinity would occur on previously disturbed land. The Project Site does not contain any sensitive biological resources, and there are no native or protected trees located on-site or within the adjacent rights-of-way. Like the Project, related projects involving tree removals would be required to comply with applicable regulatory requirements such as the Migratory Bird Treaty Act, California Fish and Game Code Section 3503, and standard construction processes during nesting season, to ensure significant impacts to migratory birds do not occur. As such, the Project would not contribute to a cumulative effect associated with biological resources.

- **Cultural Resources (Human remains)**—With regard to human remains, if human remains are discovered during construction of any related projects, work in the immediate vicinity of the construction area would be halted, and the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), like the Project. Therefore, compliance with the regulatory standards would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Geology and Soils (except paleontological resources)**—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 implementation of site-specific geotechnical recommendations and/or mitigation measures. Thus, impacts would not be cumulatively considerable and would be less than significant.

- **Hydrology and Water Quality (Located in a floodplain, subject to inundation by 100-year flood flows, or conflict with a water quality control plan)**—As indicated in Checklist Question No. X.d, the Project is not proposed in a floodplain, would not be subject to inundation by 100-year flood flows, seiches or tsunamis, or conflict with a water quality control plan. Therefore, the Project would not contribute considerably to cumulative hydrology and water quality impacts, and cumulative hydrology and water quality impacts would be less than significant.

- **Land Use and Planning (Physically divide an established community)**—No related projects that could cause land use incompatibility are known to be located in the immediate vicinity of the Project Site. Additionally, the Project's scope of work is limited to the Project Site, and the requested discretionary actions are site-specific. As such, Project-level impacts related to physically dividing an established community would be less than significant, and therefore could not combine with other projects in the vicinity of the Project Site to result in cumulative impacts. Cumulative impacts would be less than significant.

- **Noise (Private airstrip or an airport land use plan)**—Due to the site-specific nature, impacts related to projects exposing people that reside or work in the vicinity of related projects to excessive noise levels from a private airstrip or airport are typically assessed on a project-by-project basis. The Project Site is not located within the vicinity of a private airstrip or within an area subject to an airport land use plan. The Project would have no private airstrip- or airport-related impact, and therefore could not combine with other

projects to result in cumulative impacts. As such, cumulative impacts would be less than significant.

- **Population and Housing**—Not all related projects would include residential uses. As discussed in Checklist Question No. XIV.a, Population and Housing, the Project does not propose residential uses and thus would not directly contribute to population growth or a need for housing, and its indirect impacts would be limited. Further, as part of the environmental review processes for the related projects, it is expected that mitigation measures would be established as necessary to address potential impacts related to population and housing. Thus, any Project impacts related to population and housing would not be cumulatively considerable, and cumulative impacts would be less than significant.

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

  With regard to operation, the Project would not generate a residential population that would directly increase the demand for schools, parks, and libraries, although the increase in commercial development could indirectly marginally increase the demand for these services. Other related projects could also increase the demand for these services and facilities. However, as discussed in Checklist Question No. XV.c, Public Services, in the case of schools, the applicants for most related projects would be required to pay school impact fees, which would as a matter of law offset any potential impact to schools associated with the related projects. Similarly, in the case of parks and recreational facilities (i.e., existing neighborhood and regional parks), projects with residential components would be required by the LAMC to include open space and pay park in-lieu fees (as required), which would help reduce the demand on neighborhood and regional parks, thereby reducing the likelihood that there would be substantial deterioration of parks. Employees generated by the non-residential related projects, like the Project, 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, like the Project, 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, or libraries. As such, in each case, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Utilities and Service System—Solid Waste**—The Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction periods. However, as discussed above in Checklist Question No. XIX.d,

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

- **Wildfire**—The Project Site is located in an urbanized area and there are no wildlands located in the vicinity of the Project Site. Therefore, the Project would not contribute to an increased wildfire risk. Moreover, the Project and related projects would be developed in accordance with LAMC and LAFD requirements pertaining to fire safety. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to wildfires. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less that significant.

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

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