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

INITIAL STUDY

FOX FUTURE Project

Case Number: ENV-2023-1819-EIR

Project Location: 10201 and 10267-10275 West Pico Boulevard, Los Angeles, California, 90064

Community Plan Area: West Los Angeles

Council District: 5 - Yaroslavsky

Project Description: The Project Site is comprised of 52.97 acres located at 10201 Pico Boulevard (Fox Studio Lot) within the boundaries of the Century City South (CCS) Specific Plan, and currently developed with soundstages and other studio-related facilities; and 0.33 acres located at 10267-10275 Pico Boulevard (Pico Properties), west of and abutting the CCS Specific Plan, and currently developed with three existing buildings that are located on the north side of Pico Boulevard, west of and abutting the CCS Specific Plan.

The FOX FUTURE Project (Project) proposes 2,092,348 square feet of new construction within the CCS Specific Plan area consisting of new studio uses, general office uses, and supporting facilities, as well as parking facilities, circulation improvements, landscaping, and open space amenities. As part of the Project, a total of 465,507 square feet would be demolished, including 460,998 square feet within the CCS Specific Plan and 4,509 square feet within the Pico Properties. A total of 1,344,058 square feet of existing floor area would be retained within the CCS Specific Plan, of which 50,482 square feet would be adaptively reused, while a total of 9,235 square feet would be retained and adaptively reused within the Pico Properties. Development at Project buildout would total 3,445,641 square feet, of which 3,436,406 square feet would be located within the CCS Specific Plan, and 9,235 square feet within the Pico Properties.

PREPARED FOR:
City of Los Angeles
Department of City Planning

PREPARED BY:
Meridian Consultants LLC

APPLICANT:
Fox Studio Lot, LLC; Pico Property, LLC; and 10271-10275 W Pico Boulevard, LLC

February 2024

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1 INTRODUCTION

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

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

1.1 PURPOSE OF AN INITIAL STUDY

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

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

is appropriate. If the Initial Study concludes that neither a Negative Declaration nor Mitigated Negative Declaration is appropriate, an EIR is normally required.[1]

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1 INTRODUCTION

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

2 EXECUTIVE SUMMARY

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

3 PROJECT DESCRIPTION

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

4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

1.3 CEQA PROCESS

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

1.3.1 Initial Study

At the onset of the environmental review process, the City has prepared this Initial Study to determine if the proposed Project may have a significant effect on the environment. This Initial

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

Study determined that the proposed Project may have a significant effect(s) on the environment and an EIR will be prepared.

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

1.3.2 Draft EIR

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

1.3.3 Final EIR

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

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

2 EXECUTIVE SUMMARY

PROJECT TITLE	FOX FUTURE
ENVIRONMENTAL CASE NO	ENV-2023-1819-EIR
RELATED CASES	CPC-2023-1817-GPA-SP-ZC-MCUP-SPP, CPC-2023-1818-DA
PROJECT LOCATION	10201 and 10267-10275 West Pico Boulevard, Los Angeles, CA
COMMUNITY PLAN AREA	West Los Angeles
GENERAL PLAN DESIGNATION	Limited Industrial (SP Area B) and Neighborhood Commercial (Pico Properties)
SPECIFIC PLAN	Century City South
ZONING	[Q]CCS-O (SP Area B) and C2-1VL-O (Pico Properties)
COUNCIL DISTRICT	CD 5 –Yaroslavsky
LEAD AGENCY	**City of Los Angeles**
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	Rey Fukuda
ADDRESS	221 North Figueroa Street, Suite 1350
	Los Angeles, CA 90012
PHONE NUMBER	(213) 847-3686
EMAIL	Rey.Fukuda@lacity.org
APPLICANT	Fox Studio Lot, LLC; Pico Property, LLC; and 10271-10275 W Pico Boulevard, LLC
ADDRESS	10201 West Pico Boulevard, Los Angeles, CA 90035
PHONE NUMBER	(310) 369-1000

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 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.

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 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

3.1.1 Overview

The Applicant[2] (FOX) is proposing the FOX FUTURE Project (Project), which includes the development of new studio-related and general office uses with supporting facilities, as well as parking and circulation improvements, landscaping, and open space amenities.

The Project Site is comprised of 52.97 acres located at 10201 Pico Boulevard (Fox Studio Lot) within the boundaries of the Century City South (CCS) Specific Plan, and currently developed with soundstages and other studio-related facilities; and 0.33 acres located at 10267-10275 Pico Boulevard (Pico Properties), west of and abutting the CCS Specific Plan, and currently developed with three existing buildings that are located on the north side of Pico Boulevard, west of and abutting the CCS Specific Plan. (See attached Project Location Map) In total, the Project Site encompasses 53.3 acres.

On-site development at Project buildout would total 3,445,641 square feet. Of this total, 3,436,406 square feet would be located within the CCS Specific Plan, with the remaining 9,235 square feet located within the Pico Properties. Additional information regarding Project development within the CCS Specific Plan and the Pico Properties is provided below.

3.1.2 Proposed Development within the Boundaries of the CCS Specific Plan

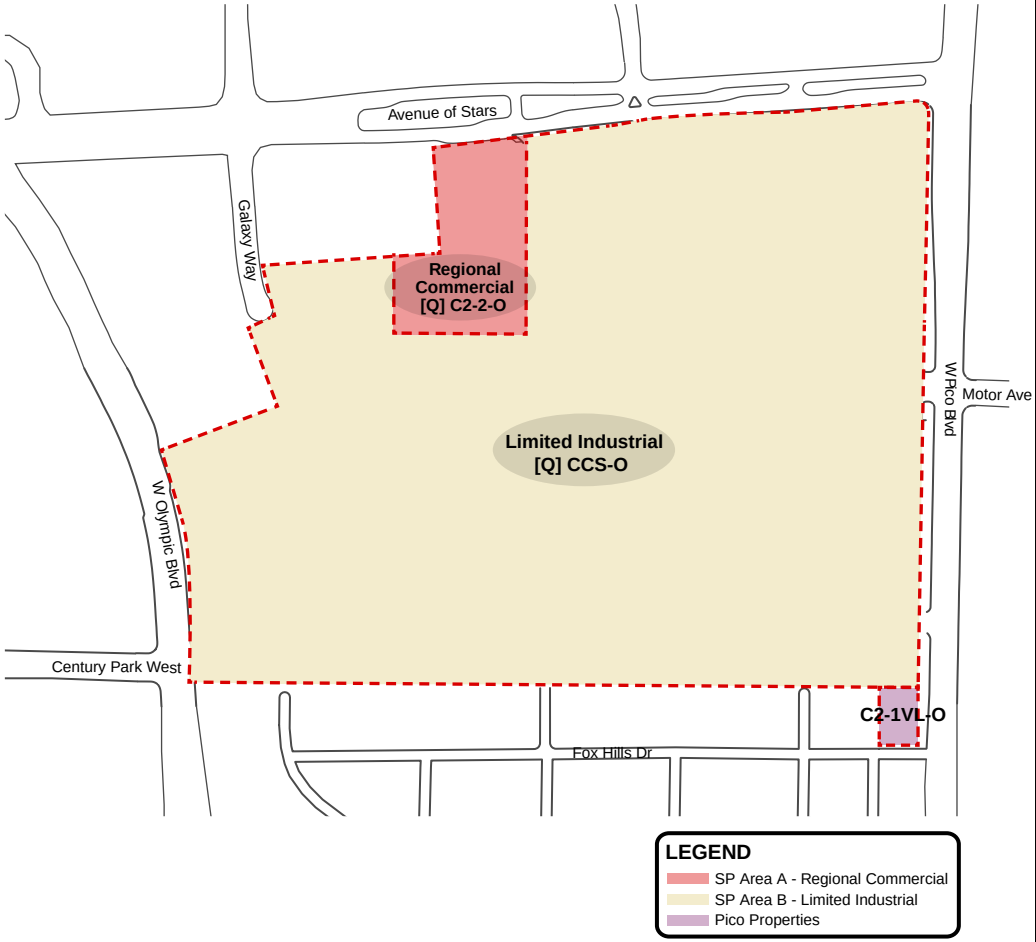
As detailed below, Project development within the CCS Specific Plan is contingent on the approval of a General Plan Amendment to change the land use designation for a portion of the Project Site from Limited Industrial to Regional Commercial; a Specific Plan Amendment to the Century City South Specific Plan to update the permitted scope and boundaries of development proposed for Specific Plan Areas A and B; and a Zone Change from [Q]CCS-O to [Q]C2-2-O for a portion of the Project Site, and to modify the [Q] Conditions pursuant to Ordinance No. 168,859 to be consistent with the changes proposed by the Specific Plan Amendment. **Figure 1**, *Proposed Land Use and Zoning Designations*, illustrates the proposed General Plan Amendment and Zone

[2] The Project Site is currently owned by Fox Studio Lot, LLC; Pico Property, LLC; and 10271-10275 W Pico Boulevard, LLC; hereafter collectively referred to as the Applicant.

Change, whereas **Figure 2**, *Current and Proposed CCS Specific Plan Areas*, illustrates the proposed Specific Plan Amendment.

Existing Condition

Existing Community Plan & Zoning Designations



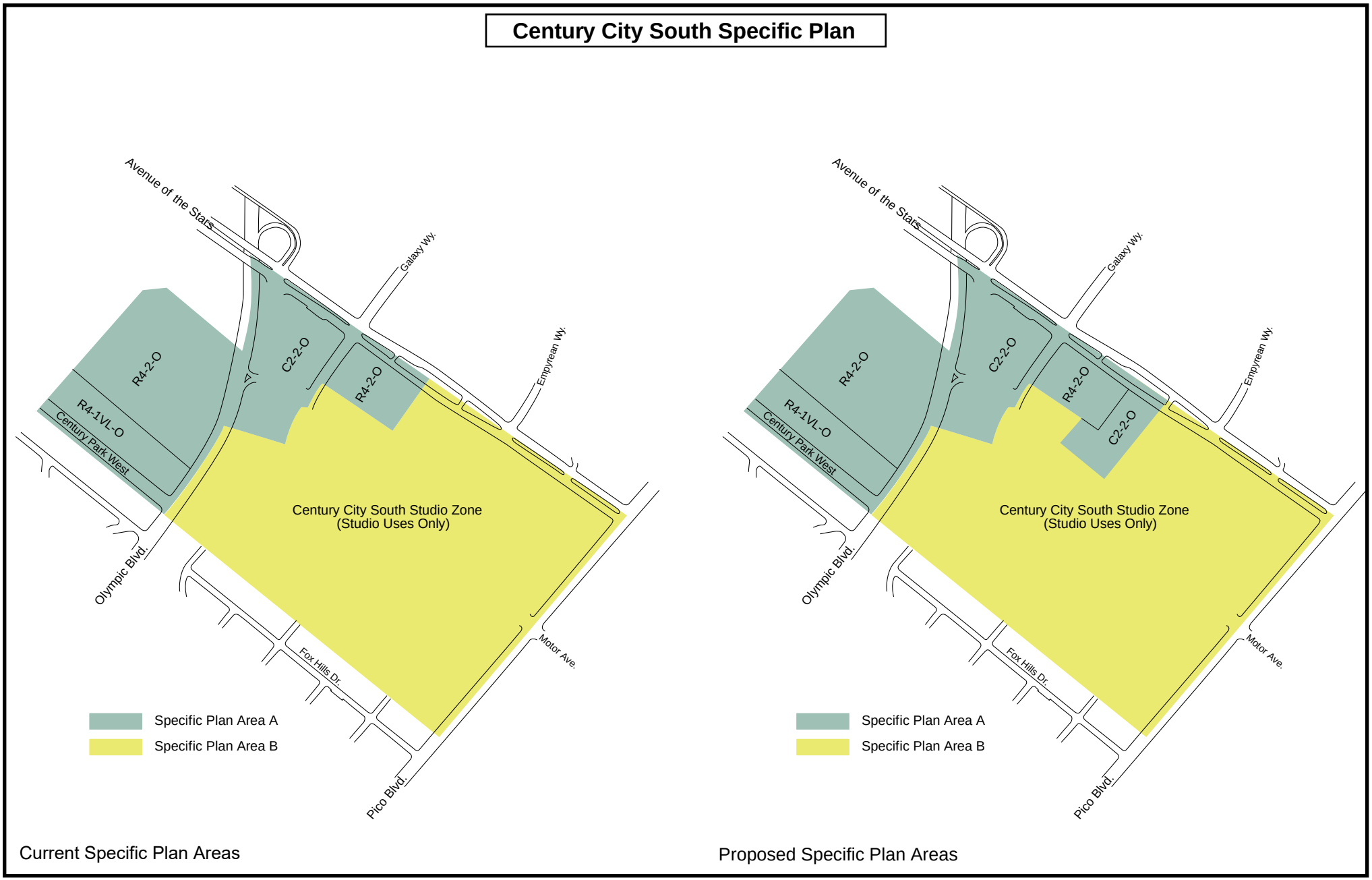
Proposed Condition

Proposed Community Plan & Zoning Designations

SOURCE: RIOS - January 2024; Meridian Consultants - 2024

FIGURE **1**

Proposed Land Use and Zoning Designations



SOURCE: RIOS - January 2024; Meridian Consultants - 2024

FIGURE **2**

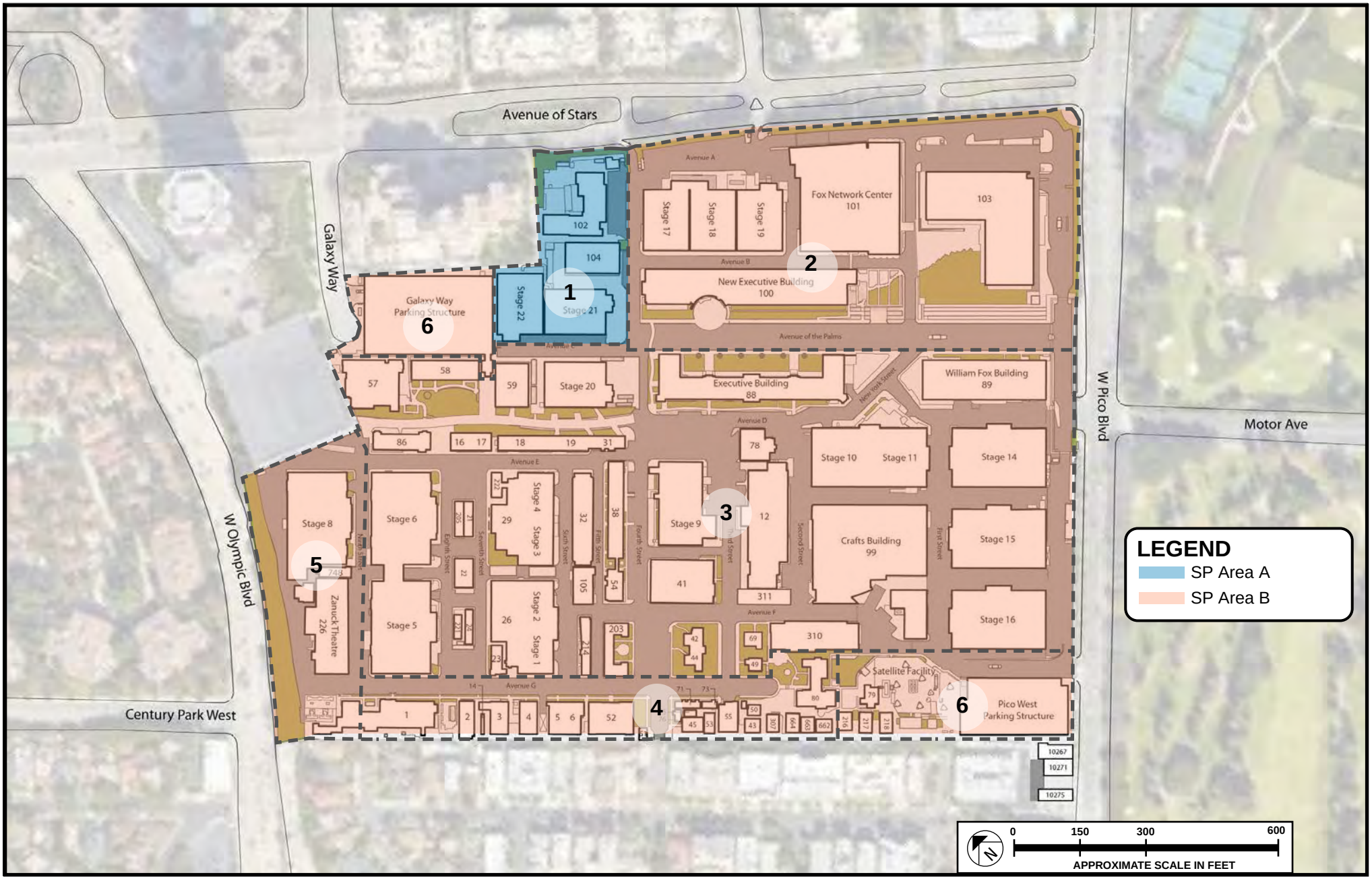
Current and Proposed CCS Specific Plan Areas

The Project would expand the on-site studio-related uses that currently exist within Specific Plan Area B (SP Area B) of the CCS Specific Plan, in addition to a new general office building in the northeast corner of the Project Site portion of the CSS Specific Plan along Avenue of the Stars that would operate independently from the studio-related uses and would be redesignated as Specific Plan Area A (SP Area A) as part of the Specific Plan Amendment. This general office building would be comprised of a 37-story building above seven levels of above-grade parking and would be consistent with existing high-rise office development to the north and east of the Project Site, while also continuing the defining high-rise characteristic of Avenue of the Stars. The proposed general office building would also function as a transit-oriented development as it is located approximately one-third mile from the Century City/Constellation Station rail station that is currently under construction as well as being served by multiple existing bus lines.

As shown in **Figure 2**, the CCS Specific Plan consists of two geographic areas that are designated SP Area A and SP Area B. SP Area A is generally located on the northern portion of the CCS Specific Plan, while SP Area B is generally located in the southern portion of the CCS Specific Plan. The portion of the Project Site within the CCS Specific Plan is currently wholly located within SP Area B. Implementation of the Project includes a proposed adjustment to the boundaries of SP Area A and SP Area B. Under the Project, the southern boundary of SP Area A would be extended in a southerly direction to include the general office building site. As proposed, this development site would have a Regional Commercial land use designation and a zoning designation of [Q]C2-2-O. The remainder of the Project Site within the CCS Specific Plan would retain the current Limited Industrial land use designation and [Q]CSS-O zoning.

The Specific Plan Amendment also proposes to divide the portion of the Project Site within the CCS Specific Plan into six development areas to define land use, intensity, and building massing (see **Figure 3**, *Proposed CCS Specific Plan Development Areas*). The six Development Areas are defined based on their primary use. The proposed general office building would be located within Development Area 1, within the newly adjusted SP Area A boundary, and the remainder of SP Area B would consist of Development Areas 2-6, with studio-related administrative and media campus office uses are concentrated in Development Areas 2 and 5, studio-related production activities are concentrated in Development Areas 3 and 4, and studio-related parking is concentrated in Development Area 6. The six proposed Development Areas would provide a more comprehensive development program for the portion of the Project Site within CSS Specific Plan. Notwithstanding, proposed Project development within Development Areas 2, 3, 4, and 6 would only occur within a portion of these Development Areas as they contain existing development that is intended to remain. Further, the six Development Areas are divided into 13 Subareas which

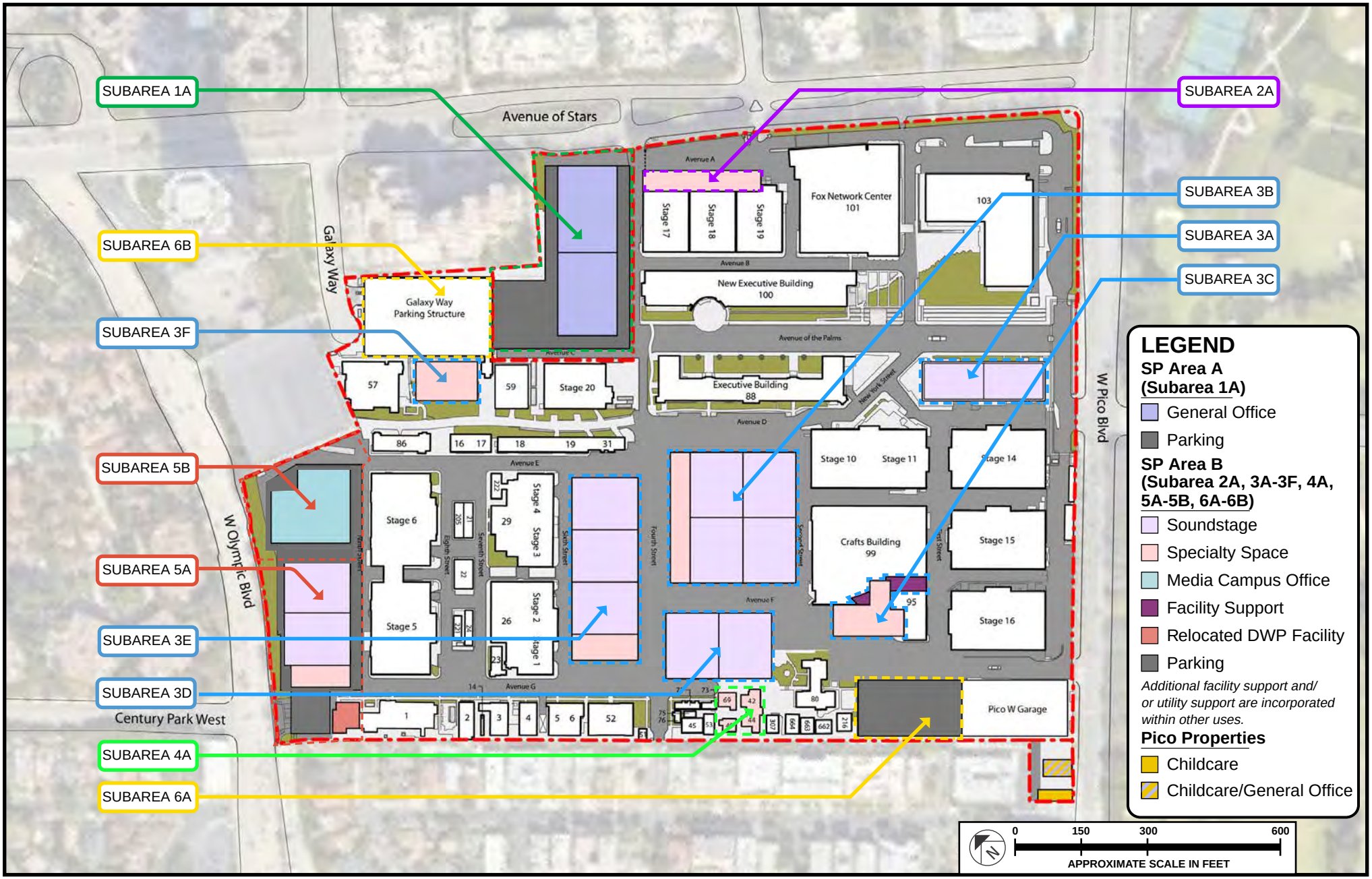
correspond and identify locations within the Development Areas where Project development would occur. The location of these 13 Subareas, numbered between Subarea 1A and Subarea 6C, is shown in **Figure 4**, *Proposed CCS Specific Plan Subareas*.



SOURCE: RIOS - January 2023; Meridian Consultants - 2023

FIGURE **3**

Proposed CCS Specific Plan Development Areas



SOURCE: RIOS - January 2024; Meridian Consultants - 2024

FIGURE **4**

Proposed CCS Specific Plan Subareas

The proposed redevelopment of portions of the CCS Specific Plan would result in 2,092,348 square feet of new floor area, consisting of studio and general office uses along with supporting parking facilities, circulation improvements, landscaping, and open space. This amount of total new floor area consists of 1,580,868 square feet of new floor area, 50,482 square feet within one existing building that would be adaptively reused, and 460,998 square feet of existing building floor area that would be demolished and replaced within the CCS Specific Plan. Additional information regarding Project development within the CCS Specific Plan is provided below. Project building is contingent upon approval of the following requested entitlements:

1. Pursuant to LAMC Section 11.5.6 A, a **General Plan Amendment** to change the land use designation for a portion of the Project Site from Limited Industrial to Regional Commercial;

2. Pursuant to LAMC Section 11.5.7 G, a **Specific Plan Amendment** to the CCS Specific Plan[3] to update the permitted scope and boundaries of development proposed for Specific Plan Areas A and B;

3. Pursuant to LAMC Section 12.32 F, a **Zone Change** from [Q]CCS-O to [Q]C2-2-O for a portion of the Project Site, and to modify the [Q] Conditions pursuant to Ordinance No. 168,859 to be consistent with the changes proposed by the Specific Plan Amendment;

4. Pursuant to LAMC Section 12.24 W.1, a **Main Conditional Use Permit** for the on-site sale and consumption of alcoholic beverages;

5. Pursuant to LAMC Section 13B.4.2, a **Project Compliance** for development within the CCS Specific Plan;

6. Pursuant to California Government Code Section 65864-65869.5, a **Development Agreement**;

7. Pursuant to LAMC Section 17.50, a **Parcel Map** for the subdivision of one lot into two ground lots, and a haul route for the export of up to a maximum of 669,127 cubic yards of soil; and

[3] Century City South Specific Plan Section 6.B.3 sets forth the provisions for the phasing of development within Area B. As set forth therein, the Studio Property (herein referred to as SP Area B) would be developed in three phases. As of this date, the development permitted under Phases 1 and 2 has been completed. Phase 3 permits the addition of a maximum of 100,000 square feet of development within SP Area B subject to discretionary approval and possible further environmental review by the City. No development per the provisions of Phase 3 has occurred as of this date.

8. Other discretionary and ministerial permits deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

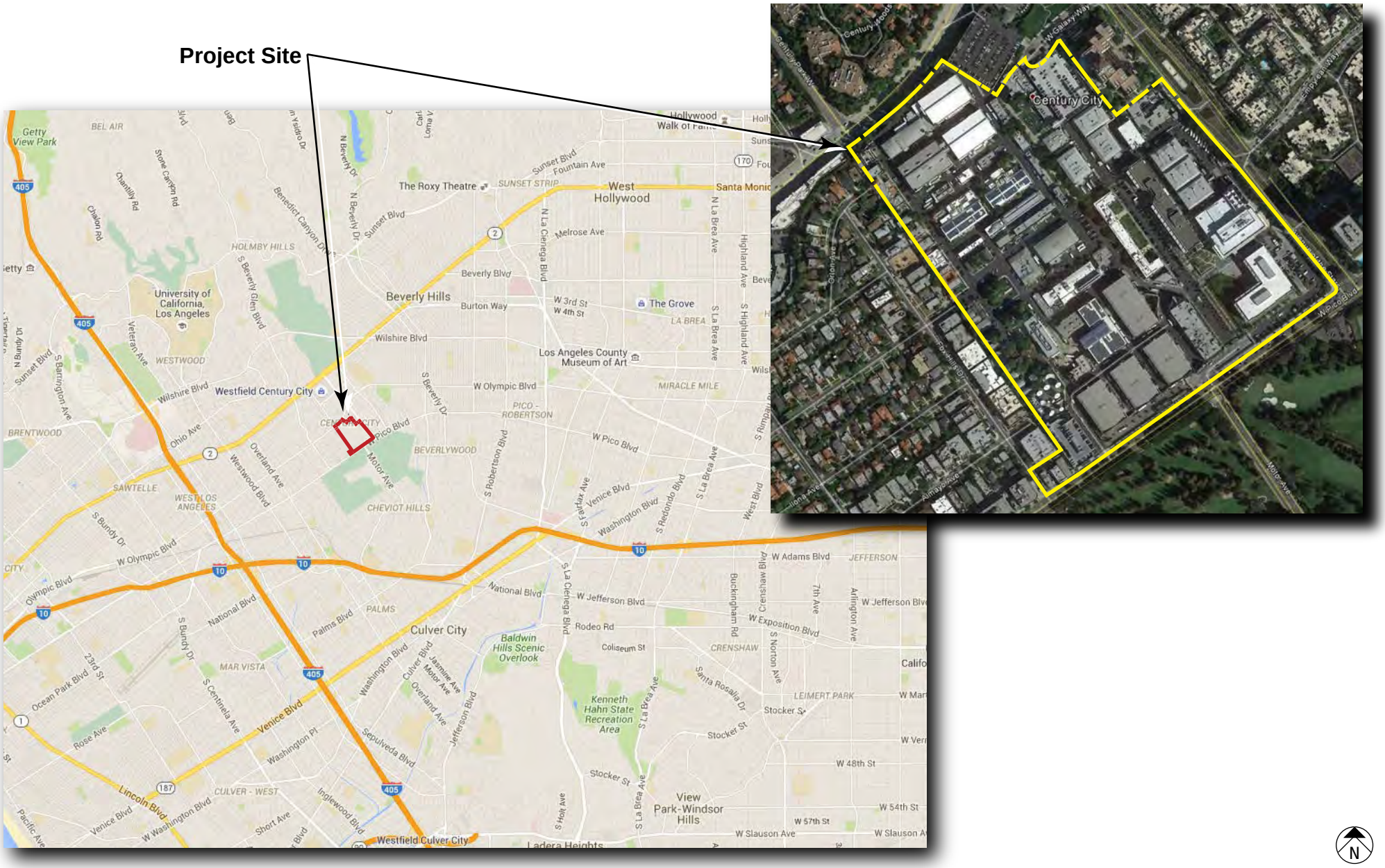
3.1.3 Pico Properties

The Project proposes adaptively reusing two existing buildings within the Pico Properties (10271 and 10275 Pico Boulevard) for a child care facility that is being relocated from the CCS Specific Plan, and for general office uses. The third building located at 10267 Pico Boulevard would be demolished. Additional information regarding Project development within the Pico Properties is provided below.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

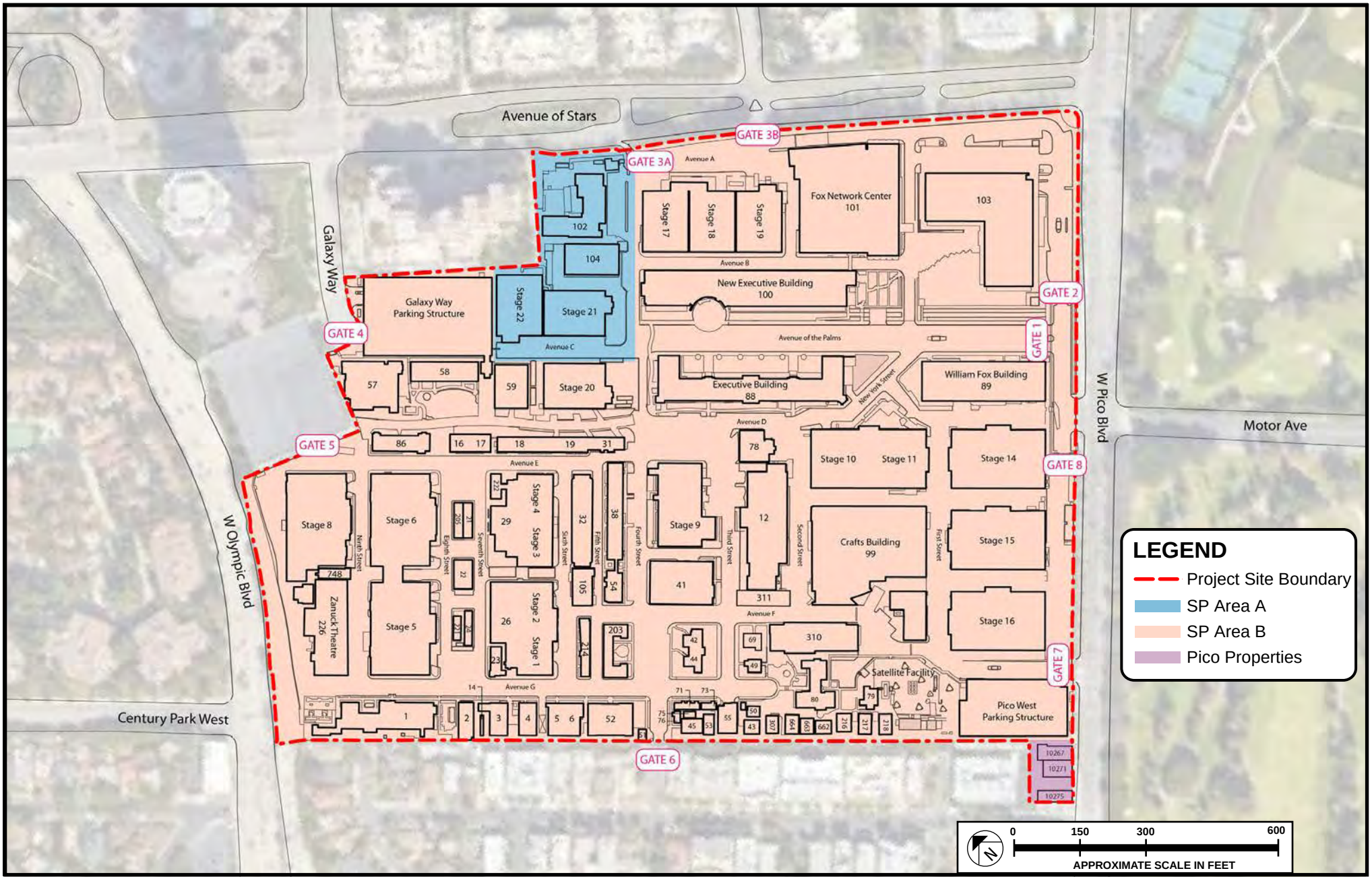
As shown in **Figure 5,** *Vicinity Map*, the 53.3-acre Project Site is located at 10201 West Pico Boulevard (CSS Specific Plan) and 10267-10275 Pico Boulevard (Pico Properties), in the Century City neighborhood of the City of Los Angeles. The locations of Project development within the CSS Specific Plan and the Pico Properties are shown in **Figure 6,** *Project Location and Existing Conditions*. The Project Site is located in the western portion of the City, approximately 10 miles west of Downtown Los Angeles and six miles east of the Pacific Ocean.



SOURCE: Google Earth - 2024; Meridian Consultants - 2024

FIGURE **5**

Vicinity Map



SOURCE: RIOS - January 2023; Meridian Consultants - 2023

FIGURE **6**

Project Location and Existing Conditions

Regional vehicular access to the Project Site is provided by Interstate 405 (I-405), located approximately 1.7 miles to the west. Overland Avenue provides access to Interstate 10 (I-10), located approximately 1.3 miles to the south. Vehicular access to the Project Site portion of the CSS Specific Plan is provided by Pico Boulevard, Avenue of the Stars, which connects to Santa Monica Boulevard (State Route 2), located approximately 0.5 miles to the north, Olympic Boulevard (through the 2121 Avenue of the Stars Parking Structure), and Tennessee Avenue, with access at this location limited to production-related and emergency vehicles. Vehicular access to the Pico Properties is available from Fox Hills Drive via an existing gated alley, which would remain under the Project.

Bus service in the Project Site is currently provided by the Los Angeles County Metropolitan Transportation Authority (Metro), Los Angeles Department of Transportation (LADOT), Santa Monica Big Blue Bus, Santa Clarita Transit, and Antelope Valley Transit Authority (AVTA). Metro provides bus service along Santa Monica and Pico Boulevards, as well as along Avenue of the Stars and Century Park West between Constellation Boulevard and Santa Monica Boulevard (Routes 4, 28, and 617). LADOT Commuter Express provides bus service along Santa Monica and Olympic Boulevards, as well as along Avenue of the Stars and Century Park East between Constellation Boulevard and Santa Monica Boulevard (Routes 431, 534, and 573). Culver CityBus provides service along Santa Monica Boulevard, Century Park East, Olympic Boulevard, Fox Hills Drive, and Beverly Glen Boulevard (Route 3). Santa Monica Big Blue Bus provides bus service along Pico and Olympic Boulevards, as well as along Century Park East/West between Constellation Boulevard and Santa Monica Boulevard (Routes BBB 5, BBB 7, and BBB R7). AVTA and Santa Clarita Transit provide commuter bus service along Santa Monica Boulevard, as well as along Avenue of the Stars and Century Park East/West between Constellation Boulevard and Santa Monica Boulevard (AVTA Route 786 and Santa Clarita Transit Routes 792 and 795). In addition, transit facilities planned in the area include the Metro D Line Century City/Constellation Station and extension. The Century City/Constellation Station is one of two stations within Section 2 of the Metro D Line extension and is located at the northeastern corner of Avenue of the Stars and Constellation Boulevard, roughly 0.3 miles north of the Project Site. At the time of publication of this Initial Study, service is forecasted to open in 2025.[4]

3.2.2 Overview of Existing Conditions

The existing topography of the Project Site varies in elevation, generally sloping downhill from the northeastern corner of the Project Site to the southwest. The elevation of the existing grade varies from approximately 305 feet above mean sea level (AMSL) along Avenue of the Stars to

[4] Los Angeles County Metropolitan Transportation Authority, Purple (D Line) Extension Transit Project – Section 2, https://www.metro.net/projects/westside/#status, accessed December 26,2023.

approximately 240 feet AMSL along Pico Boulevard. While the existing slope of the Project Site is generally moderate, an area of greater slope exists along the Olympic Boulevard frontage within the CSS Specific Plan, where the elevation of the existing grade drops from approximate 280 feet AMSL at the buildings located along the Project Site's northwestern boundary to an elevation of 245 feet AMSL at the intersection of Olympic Boulevard and Century Park West.

In general, neighboring properties along Avenue of the Stars are situated upslope from the Project Site, while those along Fox Hills Drive are generally situated downslope from the Project Site portion of the CSS Specific Plan and at a similar elevation to the Pico Properties. The Hillcrest Country Club, as well as the Cheviot Hills Recreation Center and Rancho Park Golf Course, located south across Pico Boulevard from the Project Site, are generally situated at the same elevation as the Project Site at this location.

Existing uses within the Project area are shown in **Figure 7**, *Existing Uses within the Project Site and Surrounding Areas*.

SOURCE: RIOS - January 2023; Meridian Consultants - 2023

FIGURE **7**

Existing Uses within the Project Site and Surrounding Areas

3.2.3 Surrounding Land Uses

Existing land uses adjacent to the Project Site include a hotel, office building, and residential development. Specifically, north of the Project Site and south of Galaxy Way is a 16-story hotel[5]. North and west of Galaxy Way are the 2121 Avenue of the Stars 35-story office building and associated six-level parking structure. Further to the north and north of Olympic Boulevard, is The Century, a 42-story residential building and the Century Woods residential development located to the west of The Century.

On the east side of Avenue of the Stars, across from the Project Site, are low-rise (two and three stories) condominiums and townhomes in gated communities with the two 28-story residential buildings of the Century Towers located at the northeastern corner of Avenue of the Stars and Pico Boulevard. South of Pico Boulevard, across from the Project Site, is the Cheviot Hills Recreation Center and Rancho Park Golf Course, and the Hillcrest Country Club and golf course located southeast of the Project Site. West of the Project Site is a residential neighborhood that consists of single-family homes and low-rise multi-family residential buildings located along a few of the north-south streets, including the east side of Fox Hills Drive directly abutting the CSS Specific Plan's western boundary and north of the Pico Properties.

Recently approved and under construction projects in the Project vicinity include the proposed 37-story Century City Center office building and the Metro D Line Century City/Constellation Station. Recently completed projects in the Project vicinity include the expansion of the Westfield shopping center; the renovation of the 19-story Fairmont Century Plaza Hotel and construction of the two 46-story residential buildings; Ten Thousand, a 40-story residential building at the southwestern corner of Santa Monica Boulevard and Moreno Drive; and the renovation of the 12-story 2000 Avenue of the Stars office building.

3.2.4 Background And Existing Conditions

The development of Fox Studios began in 1923, when William Fox acquired land on the west side of Los Angeles to accommodate location filming. The existing studio opened as Movietone City in 1928 and has continuously grown and changed over the past century. Century City grew out of a series of plans developed in the late 1950s and the early 1960s, which ultimately sought to create a "City within a City" with residential, business, hotels, shopping centers, as well as a movie studio. This blueprint for Century City evolved over the next 60+ years and resulted in the high-rise office, entertainment, and residential center on the west side of Los Angeles. FOX retained

[5] This hotel is no longer in operation.

land in the southwest quadrant of Century City for film, television, and other studio production, which is the CSS Specific Plan portion of the Project Site.

The Project Site portion of the CSS Specific Plan currently includes 1,805,056 square feet of building area and 96 permanent buildings and structures, which include soundstages, a live scoring stage, workshops, writers' offices, screening theaters, editing and post-production facilities, studio and executive offices; support services, including a commissary, fitness center, and medical department; and parking for approximately 4,286 vehicles.

The physical layout of the Project Site portion of the CSS Specific Plan is comprised of a series of intersecting private drives which dissect the Project Site portion of the CSS Specific Plan from north to south, and east to west (see **Figure 6***)*. Within the primary grid system is a series of nodes or complexes, each with character-defining building types and functions. Within the south-central part of the Project Site portion of the CSS Specific Plan are two buildings (Buildings 100 and 88) that serve as the executive and administrative center. This node is primarily bordered by soundstages to the north, east, and west. The northwestern portion of the Project Site portion of the CSS Specific Plan is occupied by the Zanuck Theater, which is bordered by soundstages to the east and south. Between this node and the Galaxy Way Parking Structure to the east is an amenities node, which includes the Commissary and other services to support on-site employees. Along the western boundary of the Project Site portion of the CSS Specific Plan are buildings used as production office space, as well as the Pico West Parking Structure and an electrical substation.

The Pico Properties include three parcels with street addresses of 10267, 10271, and 10275 Pico Boulevard. The three buildings that compose the Pico Properties have a current combined floor area of 13,744 square feet. The building at 10267 Pico Boulevard includes 4,509 square feet of floor area and is occupied by FOX for production support purposes, whereas the two buildings at 10271 and 10275 Pico Boulevard are currently vacant.

3.2.5 Existing Planning and Zoning

3.2.5.1 CCS Specific Plan

In 1981, under Ordinance Nos. 156,122 and 156,121, the City of Los Angeles adopted two specific plans to guide the future development of the northern and southern portions of Century City. These Specific Plans were intended to provide regulatory controls and incentives to provide for public needs, convenience, and general welfare as development of the area necessitates and to assure orderly development and provide street capacity and other public facilities appropriate for

the intensity and design of development. The northern portion is regulated by the Century City North Specific Plan and is bounded by Santa Monica Boulevard to the northwest, Century Park East and the City of Beverly Hills to the northeast, Pico Boulevard to the southeast, and Century Park West and the Century City South Specific Plan area to the southwest. The southern portion is regulated by the Century City South Specific Plan and is bounded by Olympic Boulevard to the northwest, Avenue of the Stars to the northeast, Pico Boulevard to the southeast, and residential development fronting Fox Hills Drive to the southwest. The portion of the Project referred to as SP Areas A and B are located within the boundaries of the Century City South Specific Plan.

In 1993, under Ordinance No. 168,862, the CCS Plan was amended to designate a portion of the Specific Plan area as SP Area B and was restricted to only studio-related uses (1993 Specific Plan Amendment). The amendment allowed for a maximum of 771,000 square feet of new studio use facilities and 507,000 square feet of demolition and replacement, with Studio Office uses limited to 934,000 square feet and a maximum total of 1,895,000 gross square feet. This development was permitted to occur in three phases linked to the number of vehicle trips generated by SP Area B development. Specifically, under Phase 1, SP Area B was limited to 11,500 average daily trips, whereas under Phases 2 and 3, SP Area B was limited to 14,310 and 15,646 average daily trips, respectively.[6] A limit of 4,500 parking spaces was also established for SP Area B under the current Century City South Specific Plan.

The CCS Specific Plan establishes the uses permitted within SP Area B,[7] defines nine development areas with varying height limits,[8] and requires the preparation of a Historic Preservation Plan (HPP) to protect the historic resources present within SP Area B.

The City of Los Angeles, concurrent with the 1993 Specific Plan Amendment, approved a Zone Change for SP Area B that unified its zoning classification from various residential and commercial

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6 The Century City South Specific Plan regulates permitted development for the Project Site (Century City South Studio Zone/SP Area B) via a combination of square footage and specific trip allocations.

7 The on-site uses permitted by the Century City South Specific Plan are as follows: studio office, studio production/post production, support, ancillary support, and parking.

8 Height limits within Areas 1, 3, 5, 6, 7, and 8 range from 15 to 75 feet, measured in accordance with the provisions set forth in Los Angeles Municipal Code (LAMC) Section 12.21.2, exclusive of roof structures (see Figure 1 of the Century City South Specific Plan for the location of Areas 1 through 9). The height limit for Area 2 is as follows: a building or structure shall not exceed a height of 335 feet above mean sea level, including perimeter parapets on the roof of the structure. The height limit for Area 4 is as follows: buildings may not exceed a height between 312 to 365 feet above mean sea level, with the specific height defined in terms of the distance between the building and the Common Property Line, as defined in the Century South Specific Plan. The height limit for Area 9 is as follows: buildings may not exceed a height between 312 to 350 feet above mean sea level, with the specific height defined in terms of the distance between the building and the Common Property Line, as defined in the Century City South Specific Plan.

zones (i.e., R4-1VL-O, R4-2-O, R5-2-O, C2-1VL-O, and C2-2-O) to "[T][Q]CCS-O"[9] under Ordinance No. 168,859, which also established a series of permanent Qualified [Q] Conditions that limit the development that is permitted to occur within SP Area B. The Q Conditions mirror the development limitations outlined under the current Century City South Specific Plan and address development standards, including access, allowable intensity and land use restrictions, height, environmental issues, and grading.

The City, as part of the 1993 approvals discussed above, also entered into a Development Agreement with the Applicant to further guide the development of SP Area B (1993 Development Agreement), which mirrored the entitlements granted in the Zone Change action (with the [Q] Qualified Conditions), which were also duplicated in the text of the 1993 Specific Plan Amendment.

In 1994, an HPP[10] was prepared as required by the 1993 Specific Plan Amendment to the Century City South Specific Plan. The HPP indicated that SP Area B contains a distinctive configuration of buildings and structures that have been determined to be significant for its association with both the development of the motion picture industry in the United States and the concentration of the industry's production facilities in Southern California. As described in the 1994 HPP, this potential historic district includes 59 buildings that have been identified as contributors to the potential historic district and addressed the potential demolition of 13 of these contributors to create potential building pads for the build out allowed under the 1993 Specific Plan Amendment. The 1994 HPP called for "providing appropriate guidance for the rehabilitation of historic structures" and establishes "criteria for new construction which will maintain the character of the historic Fox Studio." Section 3 of the 1994 HPP provides guidelines for the Rehabilitation, Maintenance and Repair of the buildings that were designated as Preserved Buildings[11], whereas Section 4 provides criteria for new construction in proximity to the Preserved Buildings. In addition,

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[9] The zoning of [T][Q]CCS-O within the Project Site portion of the CCS Specific Plan is defined as follows: (a) [T] refers to Tentative Classification Conditions established by the City under the 1993 Zone Change; as of this date, the requirements of the [T] Conditions have been cleared and the [T] designation has been removed from the zoning classification of the Project Site portion of the CCS Specific Plan; (b) [Q] refers to permanent Qualified Conditions established by the City under the 1993 Zone Change; (c) CCS refers to the Century City South Specific Plan; and (d) O refers to the site being located within an Oil Drilling District.

[10] Historic Resources Group with the assistance of Pica & Sullivan, Architects, Ltd., Fox Studio Historic Preservation Plan, April 1994.

[11] A "Preserved Building" is defined in the 1994 HPP as a building that would be preserved and rehabilitated under the HPP (see p. 2 of the 1994 Fox Studio Historic Preservation Plan). A "Contributing Building" is a building which adds to the historical integrity or architectural qualities that along with similarly designated buildings collectively form a historic district.

the SP Area B's existing "Q" Conditions govern the demolition of a Preserved Building (see Section 2.5.u., of Ordinance No. 168,859, pages 46-48).

3.2.5.2 Pico Properties

The Pico Properties are currently zoned C2-1VL-O. C2-1VL-O is defined as follows: (a) C2 refers to the City's C2 Commercial Zone; (b) 1VL refers to the 1VL Height District, which in conjunction with the C2 Zone, allows buildings up to three stories and 45 feet in height with an FAR of up to 1.5:1; and (c) O refers to the site being located within an Oil Drilling District. In addition, the properties located at 10271 and 10275 Pico Building were granted the following zoning-related approvals by the City: (1) Conditional Use to allow the sale and distribution of a full-line of alcoholic beverages for a new 1,850 square-foot restaurant with 40 interior seats and an uncovered 1,720 square-foot patio with 50 seats (under Case No. ZA-2019-5887-CUB), and (2) lot line adjustment to adjust the property line between the two parcels (under Case No. AA-2017-4932-PMEX).

3.3. DESCRIPTION OF PROJECT

On-site development at Project buildout would total 3,445,641 square feet. Of this total, 3,436,406 square feet would be located within the CSS Specific Plan with the remaining 9,235 square feet within the Pico Properties. Additional information regarding Project development within the CCS Specific Plan and the Pico Properties is provided below.

Development within the Project Site portion of the CSS Specific Plan would require a Specific Plan Amendment to the Century City South Specific Plan to adjust the existing boundaries for Development Area 1 to be part of SP Area A, and to update the existing framework and establish development standards to be more specific to future development proposals, anticipated to guide the development of the Project Site portion of the CCS Specific Plan through 2050. The development standards proposed in the requested Specific Plan Amendment include establishing a maximum amount of square footage by land use, as well as by development area.

3.3.1 Project Development and Design

The Project, as discussed above, would develop soundstages, production support uses, and other studio-related development in addition to general office space that would operate independently from the studio-related uses and could be occupied by public/non-studio firms. FOX FUTURE implements a sitewide design that expands the types of uses that currently exist within the CCS Specific Plan. The Project integrates the new studio-related uses into the existing on-site development pattern by siting new soundstages and production support uses near existing

soundstages. The new general office building is sited at the northeast corner of the Project Site to: (1) separate the general office building from the studio-related uses, (2) provide easy access and a short travel distance to the Century City/Constellation rail station and existing bus lines, and (3) connect the general office building to other Century City high-rise buildings and continue the pattern of high-rise development along Avenue of the Stars. The Project design also adaptively reuses two of the buildings within the Pico Properties (10271-10275 Pico Boulevard).

The existing CCS Specific Plan classifies SP Area B with two land use categories: Studio Office and Non-Studio Office; and the following permitted uses: studio office, studio production/post-production, support, ancillary support, and parking. The Project, in conjunction with the requested Specific Plan Amendment, proposes to classify future Project development into new, more refined land use categories in lieu of the two categories currently permitted under the CCS Specific Plan. The Project proposes to define on-site land uses in terms of the following six permitted uses: (1) Stage Space, (2) Specialty Space[12], (3) Media Campus Office, (4) Facility Support[13], (5) Utility Support[14], and (6) General Office.

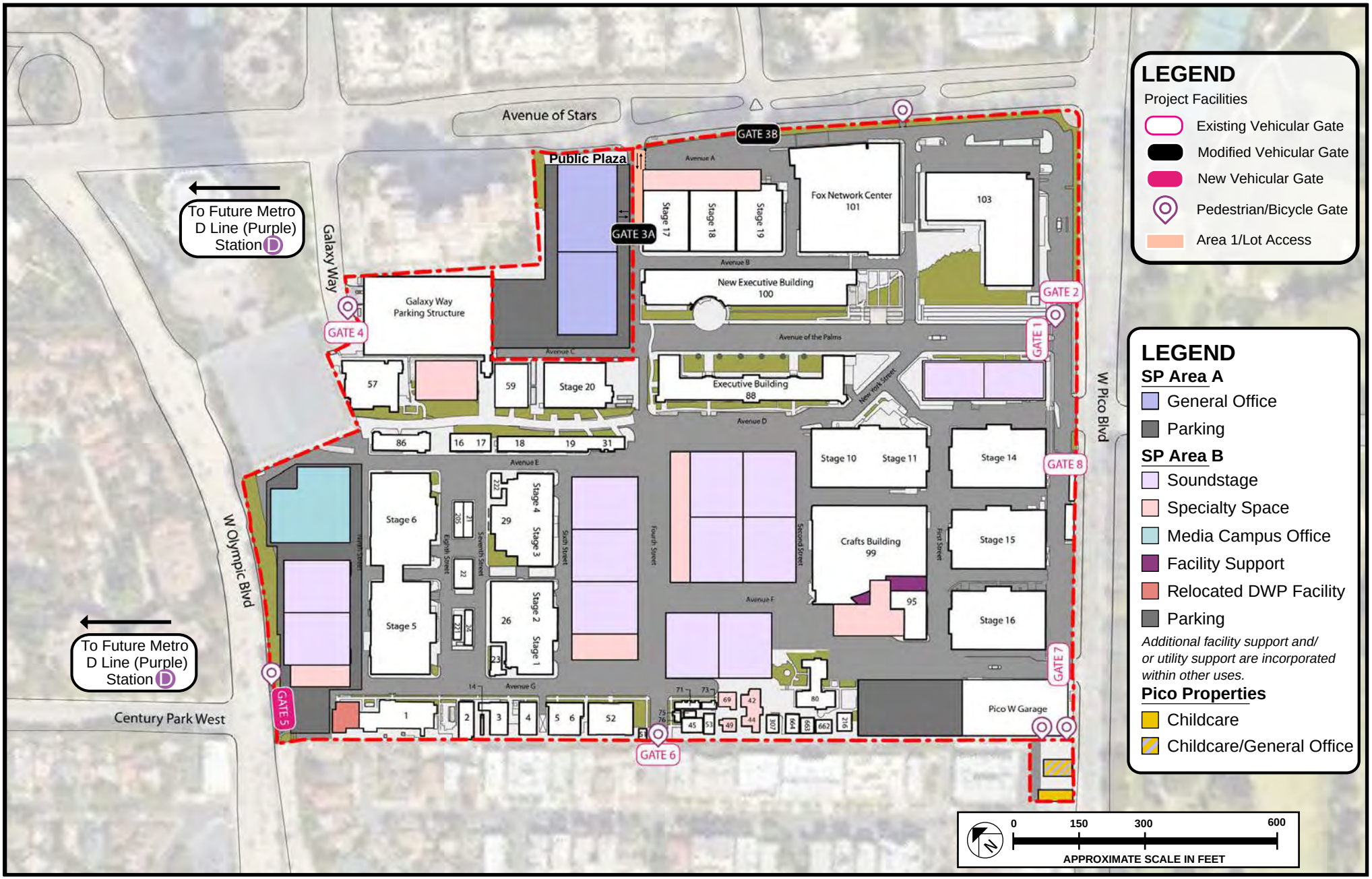
The Project proposes the development of 13 new soundstages (including four replacement soundstages) and production support spaces, classified as Specialty Space, within SP Area B (see **Figure 8**, *Conceptual Site Plan*). These additional facilities would increase the production capacity within SP Area B and provide space for content creation, which would also help preserve the integrity and scale of the historic portion of SP Area B traditionally devoted to entertainment uses. Additionally, the Project would include general, non-studio office space of different scale and positioning within SP Area A to advance the objectives of Century City and better align with

[12] Specialty Space means space used for Studio Production/Post Production and Studio Operations. Studio Production/Post-Production Use means Studio Use facilities primarily used for (1) filming, video and audio taping, recording, publication or transmission, visual and/or aural special effects; and (2) processing, screening, editing or otherwise converting films, video or audio tapes, or other material into products for sale, licensing, transmission, or distribution. Studio Operations means activities related to physical production (outdoor sets, television facilities and other locations, but excluding construction of the Project), recording, broadcasting, transmission or editing (including special effects and music) of motion pictures, television and radio programming, video recordings, audio recordings, publications and any evolution of the foregoing, including maintenance and repair and construction of sets or related structures used in production.

[13] Facility Support Space means facilities used for support functions including, but not limited to, lobbies, conference rooms, reception and waiting rooms, files, copying, coffee rooms, corridors and toilet rooms, and which includes areas designated for Studio Production Office Use or Support Use. Facility Support uses shall include consumer services on the Studio Property and to reduce the need for offsite vehicle trips during business hours. Facility Support Uses shall include, but are not limited to, those facilities primarily used for food services, banking services, hair salons, physical fitness, child care, commuter transportation, security, and the sale of sundries, studio merchandise and memorabilia if these uses are designed and operated to be available for employees and visitors, but are not available to the general public.

[14] Utility Support Space means Studio Use facilities primarily used for storage, utilities, central heating and cooling, set manufacturing, and equipment maintenance and repair.

the increased intensity of Century City, particularly along the major streets abutting the Project Site portion of the CSS Specific Plan . Additionally, the Project is seeking to accommodate studio growth and an increased need for more flexible on-site uses.



SOURCE: RIOS - January 2024; Meridian Consultants - 2024

FIGURE **8**

Conceptual Site Plan

The proposed new general office use within SP Area A would be a 965,250 square-foot, 37-story building above seven levels of above-grade parking and is proposed to be up to approximately 950 AMSL (i.e., approximately 655 feet above the adjacent ground elevation). In terms of studio uses, the Project would emphasize the development of new soundstages, as an addition to existing Building 99, and associated production support and basecamp facilities[15] within Development Areas 2, 3, 4, and 5 that would integrate with the existing studio uses that would remain under the Project. Specifically, 13 new soundstages (including four replacement soundstages) are proposed within SP Area B, 11 of which would be located in Development Area 3, with the remaining two soundstages located within Development Area 5. Production support facilities are proposed as part of the new soundstages, as an addition to Building 99, and adjacent to the existing soundstages located in Development Area 2. Project development within Development Area 4 is proposed to only occur within the central part of Development Area 4, where four buildings that are currently located within Development Area 3 would be relocated to Development Area 4 in support of preserving on-site historic resources.[16] To accommodate the four relocated buildings, three existing buildings within Development Area 4 would be demolished.[17]

Project development within the Project Site portion of the CSS Specific Plan would also include parking facilities that would support the proposed studio and general office uses. The Project proposes two new parking structures within Development Areas 1 and 5, as well as an expansion of the existing Pico West Parking Structure located in the southern portion of Development Area 6. Surface parking spaces and expanded basecamp facilities[18] would be provided in support of SP Area B's studio uses.

The proposed design of the FOX FUTURE Project is based on an evaluation of numerous factors, which collectively result in a Project design that seeks to minimize impacts to the on-site Historic District and to ensure the continued viability of the on-site Historic District. As such, in the process of adding new facilities, the Project would preserve and reuse contributing historical structures where feasible.

[15] A "basecamp facility" is the location where equipment, wardrobe, hair, makeup, as well as vehicles and trailers for talent, producers and directors are parked near or at the shooting location where the production operates.

[16] The four buildings that would be relocated to Development Area 4 are Buildings 42, 44, 49, and 69, which are currently located within the central-western portion of Development Area 3.

[17] The three buildings that would be demolished in the central portion of Development Area 4 to accommodate the relocated buildings from Development Area 3 are Buildings 43, 50, and 55.

[18] SP Area B development includes a total of 187,000 square feet of open basecamp area distributed throughout.

The increased production capability that the additional soundstages bring would be accompanied by support and specialty spaces and basecamp facilities throughout SP Area B. SP Area B development would also include a building arrangement, which would elevate the production support office levels in order to allow for at-grade production vehicle parking, which would contribute to a more efficient use of SP Area B. Furthermore, the Project would reflect the use of the on-site street pattern with centralized axes to improve on-site production and pedestrian circulation within SP Area B.

The Project would also utilize sustainability measures to improve the resiliency of the Project Site portion of the CSS Specific Plan development by including two integrated mobility facilities that would enhance pedestrian and multi-modal access to the Project Site. The two integrated mobility facilities would connect to the existing bus network and Metro D Line Century City/Constellation Station (scheduled to be in operation in 2025).

In addition, the Project within SP Area A envisions the development of 965,250 square feet of new office uses within Development Area 1. This new development could be occupied by a variety of potential tenants, including but not limited to general office and entertainment office uses. The creation of a separate parcel in Development Area 1 would allow independent development by another entity or as a joint venture between FOX and a development partner.

The Project also proposes adaptively reusing two existing buildings within the Pico Properties (10271 and 10275 Pico Boulevard), for a child care facility that is being relocated from the Project Site portion of the CSS Specific Plan, and for general office uses (10271 Pico Boulevard building only). The third building at 10267 Pico Boulevard would be demolished. Additional information regarding Project development within the Pico Properties is provided below.

3.3.2 Development Program

On-site development at Project buildout would total 3,445,641 square feet. Project development includes the demolition of a total of 465,507 square feet and a total of 59,717 square feet of existing floor area would be adaptively reused. **Table 1,** *Project Floor Area,* identifies existing on-site floor area, floor area that would be demolished under the Project, total new construction proposed by the Project, and total floor area at Project buildout as well as information regarding the development proposed within the CCS Specific Plan and the Pico Properties portions of the Project Site.

Table 1
Project Floor Area
(square feet)

	CCS Specific Plan	Pico Properties	Project Total
Existing Floor Area	1,805,056	13,744	1,818,800
Demolition	(460,998)[a]	(4,509)	(465,507)
New Construction	2,092,348	0	2,092,348
Total Floor Area	3,436,406	9,235[b]	**3,445,641**

(x,xxx) denotes a negative number

[a] One building located along Pico Boulevard (Building 89) would be adaptively reused under the Project (see Figure 6 for the location of Building 89). This building currently consists of 100,966 square feet of floor area. Under the Project, 50,484 square feet would be demolished and replaced elsewhere within the boundaries of the CCS Specific Plan, whereas the remaining 50,482 square feet would be adaptively reused.

[b] A total of 9,235 square feet of existing floor area would be adaptively reused within the Pico Properties.

CCS Specific Plan Development Program[a]

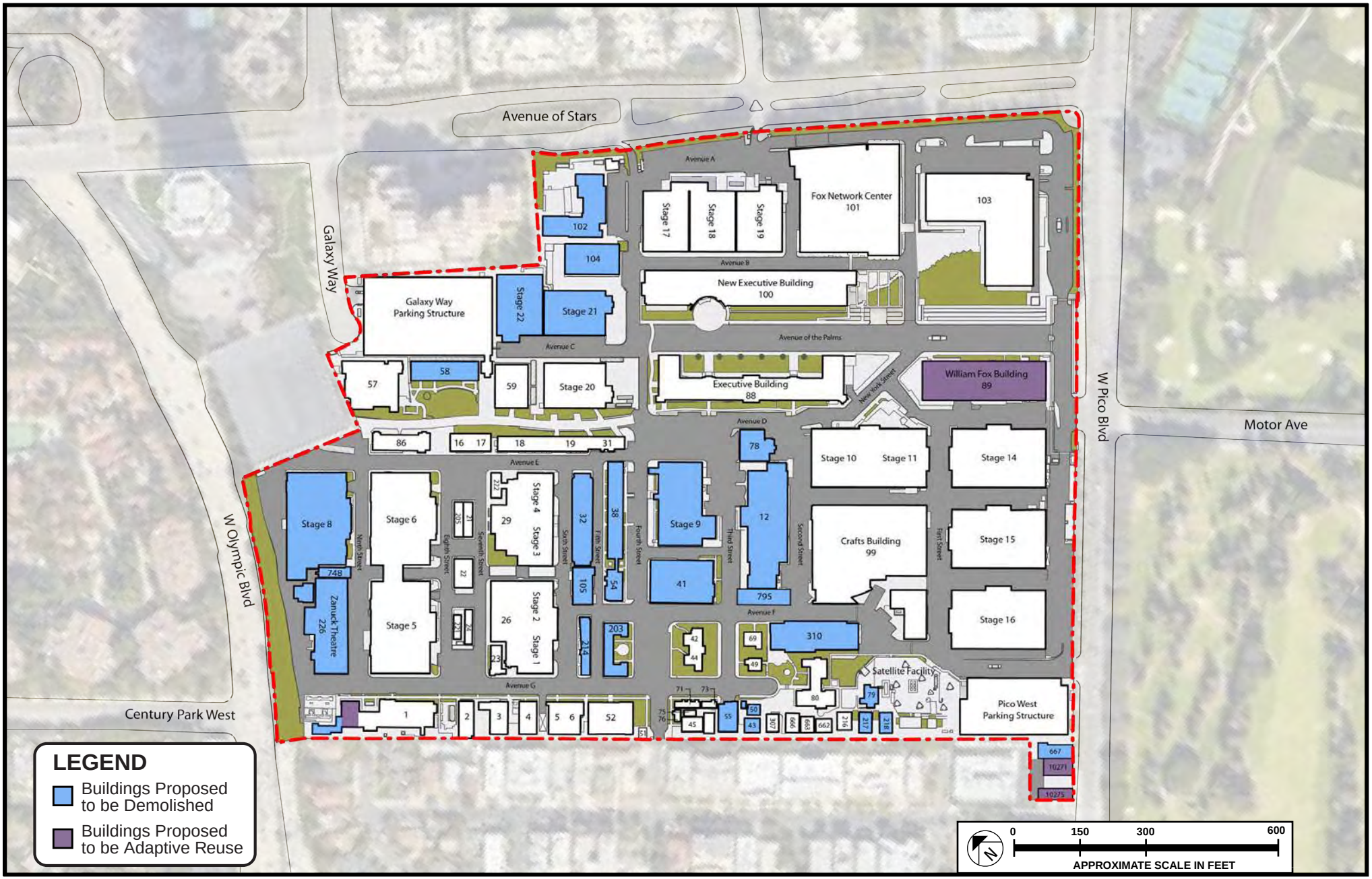
Use	Square Feet
New Construction and Adaptive Reuse	
Stage Space	223,241
Specialty Space	308,651
Media Campus Office	214,746
Facility Support	332,791
Utility Support	47,669
General Office	965,250
Total New Construction and Adaptive Reuse	**2,092,348**
Demolition	460,998
Net New Construction and Adaptive Reuse	**1,631,350**

[a] The total floor area proposed within the CCS Specific Plan would total 3,436,406 square feet (see Table above) and is calculated as follows: Total New Construction of 2,092,348 square feet (see above) plus the Existing Floor Area to Remain of 1,344,058 square feet (see Table above)

Pico Properties Development Program

Use	Square Feet
Existing Floor Area	13,744
Demolition	4,509
Existing Floor Area to Remain	**9,235**
Adaptive Reuse of Existing Floor Area to Remain	
Child Care	6,607
General Office	2,628
Total Adaptive Reuse Floor Area	**9,235**

To create buildable sites for potential future development, the demolition of existing buildings and floor area, in full or in part, is proposed to occur. The buildings that are proposed to be demolished to accommodate future development or used for adaptive reuse purposes are shown in **Figure 9**, *Buildings Proposed for Demolition or Adaptive Reuse*.



SOURCE: RIOS - January 2023; Meridian Consultants - 2023

FIGURE **9**

Buildings Proposed for Demolition or Adaptive Reuse

3.3.2.1 CCS Specific Plan

As discussed above, the Project would develop 2,092,348 square feet of new floor area within the CCS Specific Plan. However, as 460,998 square feet of existing floor area would be demolished, a maximum of 1,631,350 square feet of *net* new floor area would be developed within the CCS Specific Plan. At Project buildout, a total of 3,436,406 square feet of floor area would occur within the CCS Specific Plan, including the 2,092,348 square feet of new floor area and 1,344,058 square feet of existing development that would not be affected by the Project. In addition, Project development within the CCS Specific Plan includes a total of 50,482 square feet of existing floor area that would be adaptively reused. Additional information regarding the adaptive reuse component of the Project is provided below.

Table 1 identifies the amount of total new construction, adaptive reuse, and demolition for each of the six land use categories identified above, as well as the total amount of net new construction and adaptive reuse proposed by the Project within the CCS Specific Plan.

Building 89, located within SP Area B along Pico Boulevard would be (see **Figure 6**) reconfigured and converted from studio and production office to soundstage space and production office. Building 89 currently includes a total of 100,966 square feet of floor area, of which 83,273 square feet are classified by the existing Century City South Specific Plan as Studio Office (and would be classified as "Media Campus Office" under the proposed Specific Plan Amendment) and 17,693 square feet as Non-Studio Office (and would be classified as "Specialty Space" under the proposed Specific Plan Amendment). Under the Project, 50,482 square feet would be adaptively reused, whereas the remaining 50,484 square feet would be demolished and replaced elsewhere within SP Area B. Once the adaptive reuse of existing Building 89 is completed, it would provide a total of 25,241 square feet of soundstage space and 25,241 square feet of specialty space floor area. The reduction in the total square footage that would occur within this building results from converting a building with four occupied floors to a reconfigured building with two occupied floors, with one interior floor used for soundstage purposes and a second interior floor, which would be a basement, would be used for Specialty Space floor area. While the interior of this building would be adaptively reused, the existing exterior facades of the building would be retained. As existing Building 89 is considered a contributor to the on-site historic district, all construction activities associated with implementing the proposed adaptive reuse would be conducted in accordance with the provisions set forth in the Project's HPP and the California Historical Building Code, which is defined in Sections 18950 to 18961 of Division 13, Part 2.7 of the California Health and Safety Code.

3.3.2.2 Pico Properties

The Pico Properties, located at 10267-10275 Pico Boulevard, have an existing combined floor area of 13,744 square feet. The Project proposes to adaptively reuse two of the buildings within the Pico Properties (10271 and 10275 Pico Boulevard) for a child care facility that is being relocated from the Project Site portion of the CSS Specific Plan, as well as general office uses. The relocated child care facility would remain an amenity for FOX employees and/or other employees that work within SP Area B. Occupants of the general office building (SP Area A)_would not have access to the child care facility. The third building at 10267 Pico Boulevard would be demolished with no replaceable floor area. Thus, total building square footage under the Project for the Pico Properties would be reduced by 4,509 square feet compared to existing conditions, for a total of 9,235 square feet. The child care facility would occupy the 10275 Pico Boulevard building as well as the ground and second floors of the 10271 Pico Boulevard building, with the second floor of the 10271 Pico Boulevard building being used for the child care facility's administrative offices. The third floor of the 10271 Pico Boulevard building would be occupied by the general office uses described above. In addition, the 10267 Pico Boulevard parcel along with the area between the 10271 and 10275 Pico Boulevard buildings would be used as outdoor play areas for the child care facility. A security barrier would be constructed along the Pico Boulevard frontage, east of the 10271 Pico Boulevard building (current location of the 10267 Pico Boulevard building), as well as the area between the 10271 and 10275 Pico Boulevard buildings. Under the Project, the existing access between SP Area B and 10267 Pico Boulevard would be modified to provide access to the entirety of the Pico Properties. In addition, the existing gated alley, which provides access to Fox Hills Drive, would remain under the Project for use by the employees of the child care facility.

Table 1 identifies the amount of total new floor area for each of the land use categories identified above.

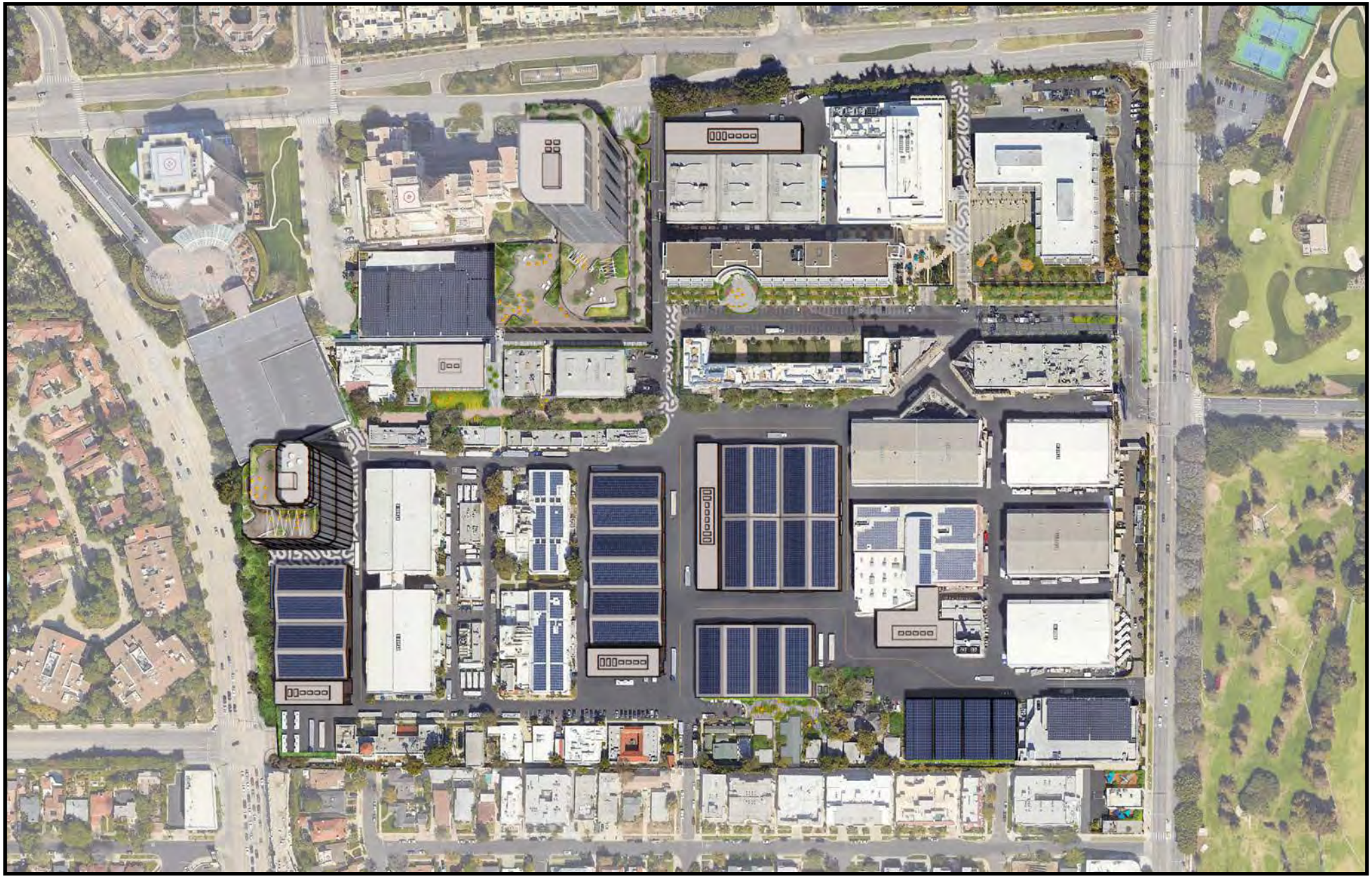
3.3.3 Conceptual Plan(s)

The Conceptual Site Plan, as shown in **Figure 8**, demonstrates how development located within the Project Site is proposed to occur and represents a reasonable scenario of existing and proposed uses at Project buildout. Actual development within the Project Site portion of the CSS Specific Plan would be defined at the time individual buildings are developed and would be governed by the Century City South Specific Plan, inclusive of the requested Specific Plan Amendment associated with the Project.

The Project's Rendered Conceptual Site Plan provides additional information as to how Project implementation may appear in the future (see **Figure 10**, *Rendered Conceptual Site Plan*). As shown in **Figure 10**, the Rendered Conceptual Site Plan shows how new rooftops would serve multiple productive purposes, including solar panel installations, as well as open spaces that provide multi-functionality for events, meeting spaces, and employee recreation. At the ground level, the Conceptual Illustrative Site Plan places an emphasis on the on-site pedestrian experience via new and improved plaza spaces that would provide improved functionality and new programming associated with building uses, as well as implementing new pedestrian wayfinding graphic treatments (i.e., artistic treatment of walkways and pathways) that would provide safe passage to the new and existing entry points to the Project Site. These ground level enhancements would facilitate pedestrian travel throughout the Project Site, as well as facilitating pedestrian and bicycle travel between the Project Site and the nearby Metro D Line Century City/Constellation Station, the construction of which is nearing completion. Further enhancements with regard to the on-site pedestrian experience would occur via enhancements to the on-site landscaping program, which features biodiverse planting that would allow for carbon sequestration, as well as the use of green walls on the south-facing facades of the new soundstages, and an Olympic Boulevard streetscape program that would screen the Project edge with new trees and drought-tolerant planting.

Figure 11, *Conceptual Rendering Looking Northeast,* provides a perspective view from the northeast of the Project within the context of existing development in Century City.

Additional information on the conceptual building elevations are presented in **Figure 12**, *Conceptual Elevations – Avenue of the Stars* and **Figure 13***, Conceptual Elevations – Olympic Boulevard and Pico Boulevard*.



SOURCE: RIOS - January 2023; Meridian Consultants - 2024

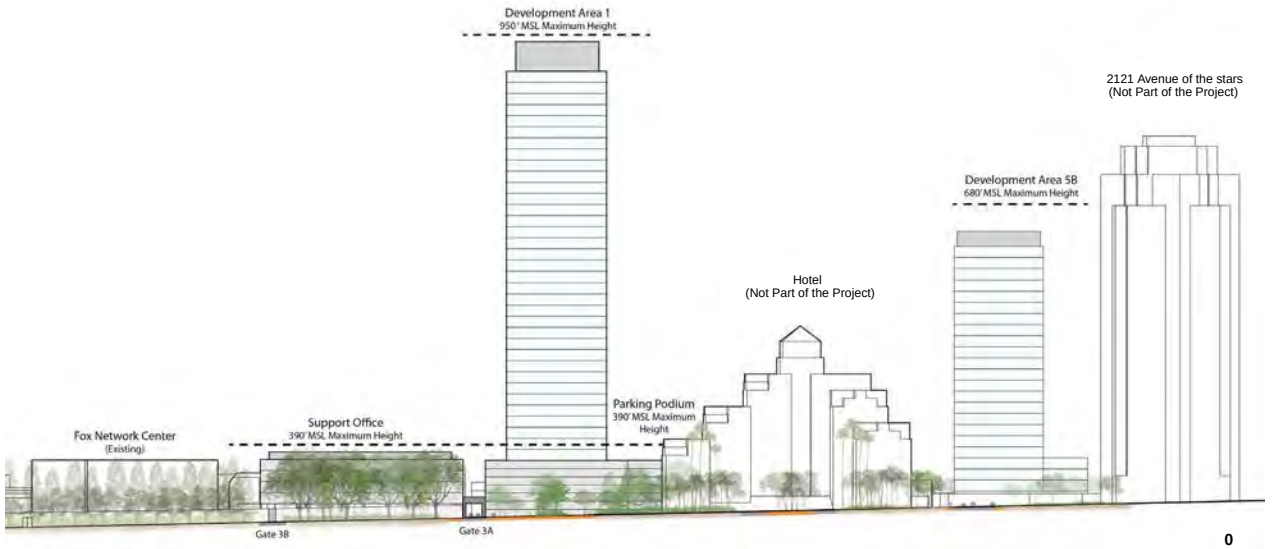
FIGURE **10**

Rendered Conceptual Site Plan

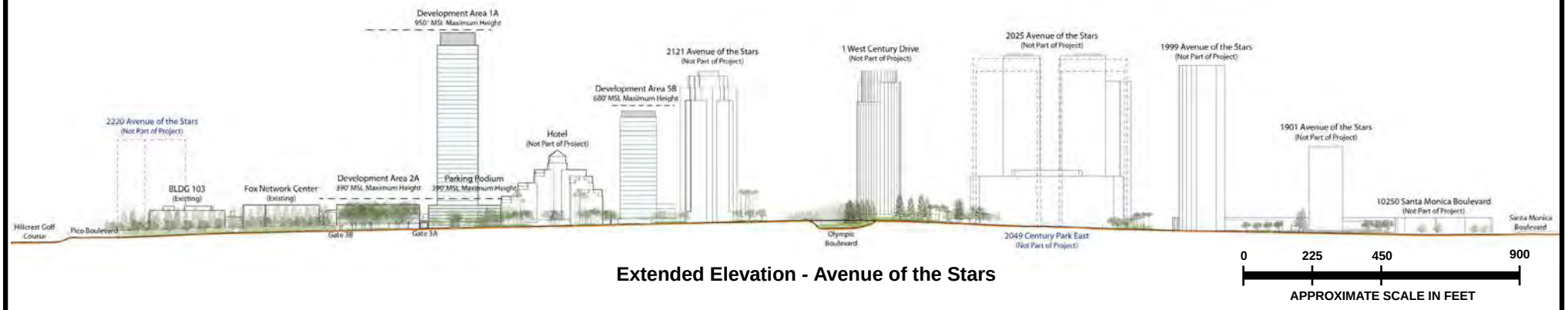
SOURCE: RIOS - January 2023; Meridian Consultants - 2023

FIGURE **11**

Conceptual Rendering looking Northeast



Elevation - Avenue of the Stars

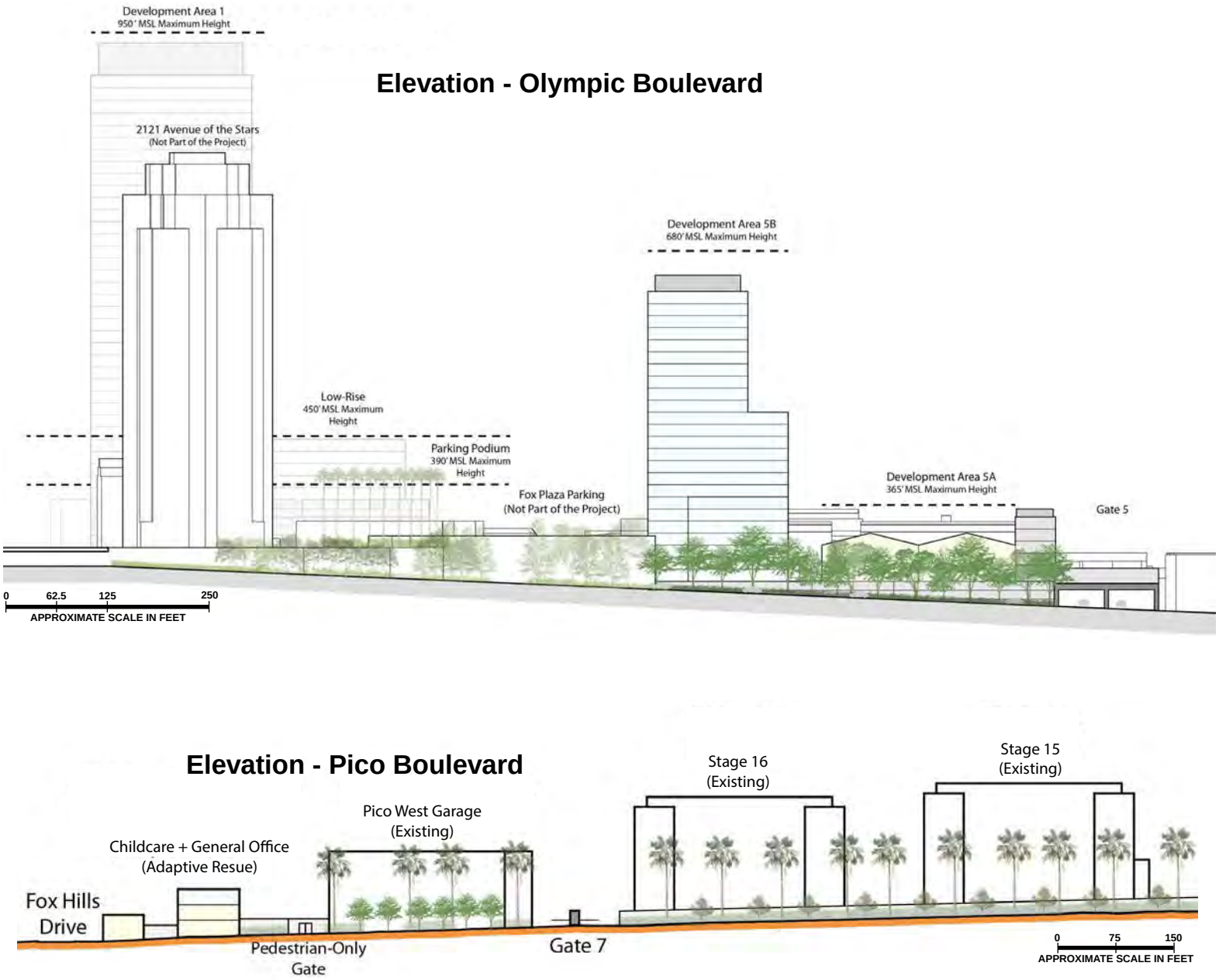


Extended Elevation - Avenue of the Stars

SOURCE: RIOS - January 2023; Meridian Consultants - 2023

FIGURE **12**

Conceptual Elevations - Avenue of the Stars



SOURCE: RIOS - January 2023; Meridian Consultants - 2024

FIGURE **13**

Conceptual Elevations – Olympic Boulevard and Pico Boulevard

3.3.4 West Los Angeles Community Plan, Century City South Specific Plan, and Zoning

To implement the development program within the CCS Specific Plan, the Project would require a Specific Plan Amendment to the CCS Specific Plan to change the boundaries and scope of development. The Project also proposes a General Plan Amendment to the land use designation for Development Area 1 from Limited Industrial to Regional Commercial and a Zone Change from [Q]CCS-O to [Q]C2-2-O. The proposed land use and zoning designations for the CCS Specific Plan are shown in **Figure 1**, *Proposed Land Use and Zoning Designations*.

The Project Site portion of the CSS Specific Plan is currently designated "Limited Industrial" on the West Los Angeles Community Plan's General Plan Land Use Map. The proposed General Plan Amendment is to change the land use designation for Development Area 1 from Limited Industrial to Regional Commercial to allow the general office use that is proposed for this portion of SP Area B that will be adjusted to SP Area A as part of the Specific Plan Amendment. All other areas within SP Area B would remain designated Limited Industrial.

The 1993 Development Agreement, which has guided the development of the Project Site portion of the CSS Specific Plan since 1993 expired in 2006. Since that time, FOX has been operating the Project Site portion of the CSS Specific Plan under the provisions of the Century City South Specific Plan. The Project Site portion of the CSS Specific Plan is currently zoned [Q]CSS-O.

Under the proposed Specific Plan Amendment and associated Zone Change, Development Areas 2, 3, 4, 5, and 6 would remain zoned [Q]CSS-O, whereas Development Area 1 would be rezoned from [Q]CCS-O to [Q]C2-2-O. The C2 Zone allows general office use within Development Area 1; and Height District 2 in association with the C2 Zone, allows a maximum FAR of 6:1. The proposed Specific Plan Amendment includes a provision which would permit the proposed internal transfer of development rights as described below.

In addition to the proposed soundstages, the Project is proposing to concentrate additional development of general office uses in Development Area 1, which is limited to approximately five percent of the Project Site portion of the CCS Specific Plan.

The proposed Specific Plan Amendment establishes an overall FAR of 1.5:1 for SP Area B and includes a provision permitting an internal transfer of development rights. Under the proposed Specific Plan Amendment, Development Areas 3, 4, 5, and Subarea 6A (SP Area B's Historic District) would be limited to a maximum FAR of 1.30:1, which would allow a transfer of up to

304,322 square feet of floor area to Development Area 1. **Table 2**, *Allowable Internal Transfer of Development Rights*, indicates how the amount of the proposed Internal Transfer of Development Rights is calculated.

Table 2
Allowable Internal Transfer of Development Rights

	Square Footage
SP Area B Historic District Area	1,601,695
Potential Development at 1.5:1 FAR	2,402,543
Potential Development at 1.3:1 FAR	2,082,204
Square Footage Eligible for Internal Transfer of Development Rights to Development Area 1	**320,339**

The Pico Properties are currently zoned C2-1VL-O (see **Figure 1**). Project development activities within the Pico Properties would occur in accordance with this existing zoning designation.

3.3.5 Development Areas

3.3.5.1 CCS Specific Plan

The development program within the CCS Specific Plan boundaries, as described above, would be comprised of six Development Areas, as shown in **Figure 3,**and identified as Development Areas 1 through 6. The numbering of the six Development Areas is for identification purposes only and is not indicative of the order of Project development.

Development Area 1 would be located in SP Area A of the CCS Specific Plan and proposes a new general office building along Avenue of the Stars. Development Areas 2-6 would be located within SP Area B of the CCS Specific Plan in a manner that integrates new studio uses into the existing conditions currently found within the Project Site portion of the CCS Specific Plan , while also seeking to preserve the Project Site's historic resources.

Table 3, *Proposed CCS Specific Plan Development Program by Development Area*, summarizes the amount of development proposed to occur within each of the six Development Areas.

Table 3
Proposed CCS Specific Plan Development Program by Development Area
(square feet)

Development Area	Total New Floor Area	Demolition[a]	Net New Floor Area
1	965,250	(72,816)	892,434
2	67,416	0	67,416
3	372,982	(307,923)	65,059
4	0[b]	(5,053)[c]	(5,053)
5	686,700	(69,112)	617,588
6	0[d]	(6,094)[e]	(6,094)
Project Total	2,092,348	(460,998)	1,631,350

(x,xxx) indicates a negative number

[a] One building located along Pico Boulevard (Building 89) would be adaptively reused under the Project (see Figure 6 for the location of Building 89). This building currently consists of 100,966 square feet of floor area. Under the Project, 50,484 square feet would be demolished and replaced elsewhere within the boundaries of the CCS Specific Plan, whereas the remaining 50,482 square feet would be adaptively reused.

[b] New construction or adaptive reuse is not proposed to occur with Development Area 4.

[c] Demolition required to accommodate the relocation of existing Buildings 42, 44, 49, and 69.

[d] New construction within Development Area 6 is limited to the expansion of the existing Pico West Parking Structure that is located in the southwestern corner of Development Area 6 (Subarea 6A). Pursuant to Section 12.03 of the LAMC, parking structure floor area is not included in the Project's total new building area.

[e] Demolition required to accommodate the expansion of the existing Pico West Parking Structure.

3.3.5.2 Pico Properties

The Pico Properties would be developed as a single development site and is not broken down into Development Areas. Additional information regarding proposed development within the Pico Properties is provided above.

3.3.6 Development Standards

3.3.6.1 CCS Specific Plan

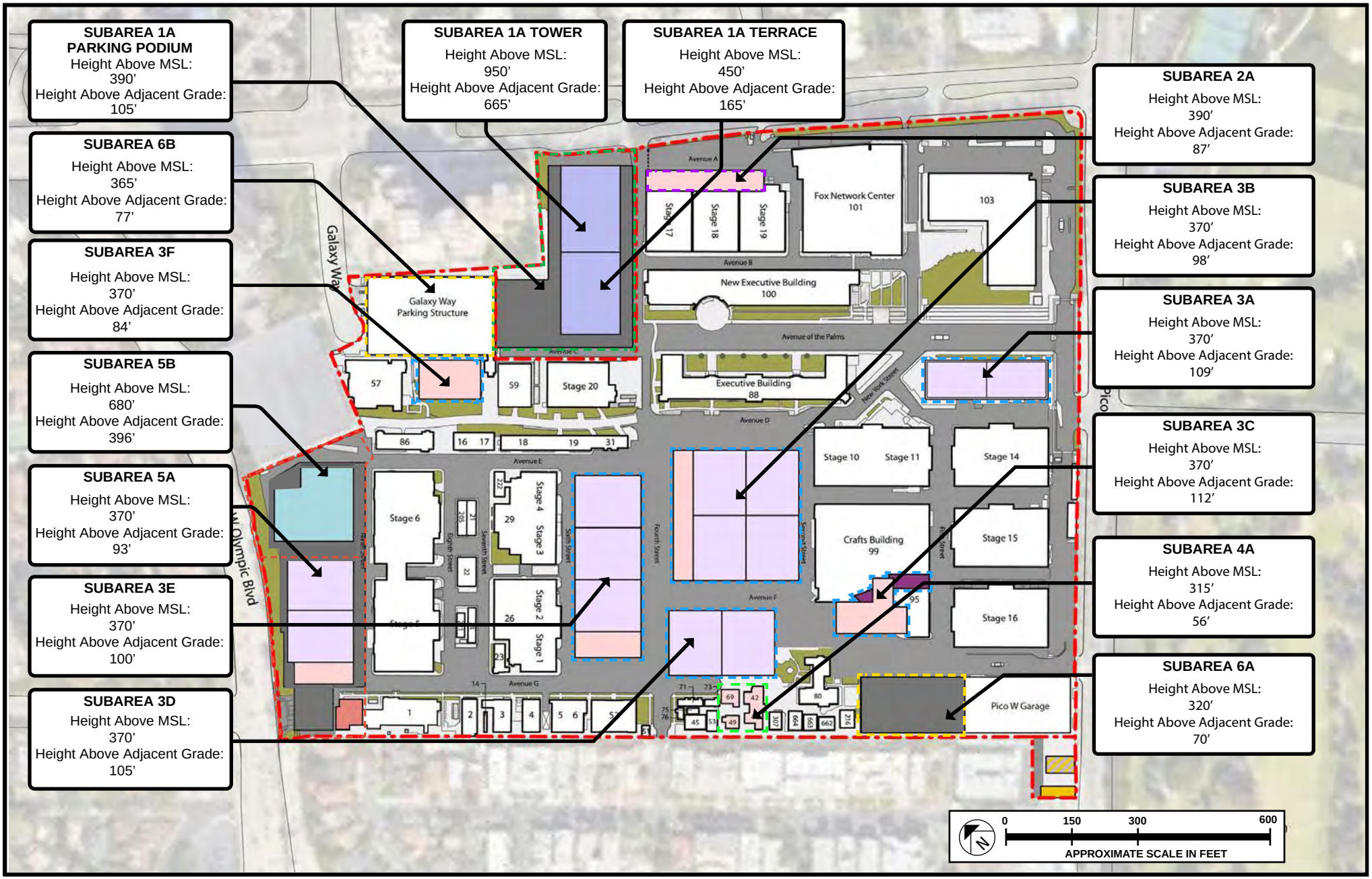
Project development within the CCS Specific Plan would be developed pursuant to development standards and specific requirements regarding building heights, setbacks, and overall design. Under the proposed Specific Plan Amendment, development within the CCS Specific Plan would be subject to the following development standards.

3.3.6.1.1 Building Height

Maximum building heights have been established for each of the 13 Subareas within the CCS Specific Plan as shown in **Figure 4**. The 13 Subareas are labeled based on the Development Area within which each Subarea is located and as such, are as follows: Subareas 1A, 2A, 3A through 3F, 4A, 5A, 5B, 6A and 6B. Building heights are defined at fixed elevations and expressed in terms of feet AMSL, measured to the highest point of any roof structure or parapet wall. This reference system is used as a uniform way of measuring the maximum building envelope across the CCS Specific Plan. Building heights are also expressed in terms of height above grade (Adjacent Ground Elevation) as defined in Section 12.21.2 of the LAMC.

As shown in **Figure 14,** *Proposed CCS Specific Plan Allowable Building Heights*, Project development within the CCS Specific Plan is divided into 13 height limit areas, which correspond to CCS Specific Plan's 13 Subareas.[19] The height limit areas do not represent the actual development footprint of Project buildings. Rather, new buildings would occupy only a portion of the development envelope permitted in each height limit area, as shown in the Conceptual Site Plan provided in **Figure 8**.

[19] The portion of Development Area 5 abutting R1-zoned properties to the west shall be subject to the transitional height limitations of LAMC Section 12.21.1 A.10, which states that building heights may not exceed 25 feet in height when set back 0 to 49 feet from the property line; 35 feet in height when set back 50 to 99 feet from the property line; and 61 feet in height when set back 100 to 199 feet from the property line.



SOURCE: RIOS - January 2023; Meridian Consultants - 2023

FIGURE **14**

Proposed CCS Specific Plan Allowable Building Heights

Height limits within the Project Site portion of the CCS Specific Plan range from 315 to 950 feet AMSL, and from 56 to 665 feet above grade (Adjacent Ground Elevation). Subareas 2A, 3A through 3F, 4A, 5A, 6A, and 6B would be Subareas with mid-rise height limits, whereas Subareas 1A and 5B would permit high-rise development.

3.3.6.1.2 Building Setbacks

Building setback areas are defined as areas where no permanent buildings are permitted above grade. Minimum building setbacks from the property line would be as follows:

- **Avenue of the Stars:** The minimum setback shall be 25 feet after any necessary street dedications. However, within 35 feet of the intersection of Avenue of the Stars and Pico Boulevard, the minimum setback shall be 35 feet.
- **Pico Boulevard:** The minimum setbacks shall be 25 feet in Development Areas 2 and 3 and 10 feet in Subarea 6A. However, within 35 feet of the intersection of Avenue of the Stars and Pico Boulevard, the minimum setback shall be 35 feet.
- **Western Property Line:**
  - **Subarea 6A:** The minimum setback shall be 15 feet.
  - **Development Areas 4 and 5:** The minimum setback shall be 20 feet. However, a maximum 12-foot wall, as measured from the Project Site side of the wall, may be constructed and/or maintained at the western Studio Property line.
- **Olympic Boulevard:** Beginning at the easterly property line, the required setback shall be 40 feet tapering in a straight line to 25 feet at the westerly property line.
- **Common Property Line:** All portions of the parking structure in Subarea 6B greater than 312 feet AMSL shall be set back from the Common Property Line as follows:
  - Eight feet immediately adjacent to the north end of the Hotel pool
  - 21 feet at the south end of Subarea 6B.
  - A distance determined by a straight line connecting the two points in the setback provisions above for the area between the north end of the Hotel pool and the south end of Subarea 6B.
  - No setback is required from the north end of Subarea 6B to the northern end of the Hotel Pool.
  - The low-rise and high-rise portions of the proposed development in Development Area 1 shall be setback from the Common Property Line a minimum of 30 feet. The parking podium shall be setback a minimum of 20 feet from the Common Property Line.

The minimum building setbacks outlined above would be the same as those set forth in the current CCS Specific Plan except for an update to location references that reflect the Project's

development areas, the proposed setback along Olympic Boulevard, and the setbacks proposed for Development Area 1 relative to the Common Property Line.

All building renovation, reconstruction, or replacement activity within SP Area B, where new construction is not proposed, would be maintained at the current building setbacks and building heights. Exceptions to those circumstances may occur only to address City-initiated seismic retrofit requirements or to address fire- or life-safety issues initiated by an Order to Comply issued by the Department of Building and Safety.

3.3.6.1.3 Historic Preservation Plan (2024)

An HPP would update the 1994 HPP to reflect changes within SP Area B since 1994, as well as SP Area B's development program. The updated HPP would be based on an updated historic resources survey and re-evaluation of the on-site Historic District within SP Area B. As with its predecessor, the updated HPP would be developed to ensure that the significance and eligibility of the Historic District within SP Area B for historic listing would be maintained following implementation of the Project. The updated HPP would also establish criteria for the rehabilitation of contributing buildings and new construction within the Historic District.

3.3.6.1.4 Additional Development Standards

The existing Century City South Specific Plan, as well as the proposed Specific Plan Amendment, would include development standards with regard to the following: (1) signage, (2) exterior lighting, (3) placement of new antennas, and (4) limitations with regard to audiences attending entertainment productions. The development standards for these on-site activities under the proposed Specific Plan Amendment would be the same as those set forth under the current Century City South Specific Plan, except outdoor lighting provisions would apply to Olympic Boulevard, in addition to Pico Boulevard. In summary, signs, including billboard-type signs, that are related to the use of SP Area B would be permitted on the Olympic and Pico Boulevard sides of SP Area B; and identification signs, defined as wall signs that are limited to a company logo, generic type of business, or the name of a business or building, monument signs, and informational signs related to the use of the Project Site portion of the CCS Specific Plan, would be permitted. With regard to exterior lighting, the development within the Project Site portion of the CCS Specific Plan would provide adequate lighting levels as required by applicable safety codes and to light pedestrian paths. In addition, lighting within the Project Site portion of the CCS Specific Plan would avoid uneven light distribution, harsh shadows, and light spillage. The placement of new antennas within the Project Site portion of the CCS Specific Plan would meet

specified standards with regard to microwave transmission, whereas the standards related to audiences attending on-site entertainment productions focuses on those that can attend such productions and how the vehicles associated with these audiences would be managed.

In addition to the above, the Specific Plan Amendment includes revisions to the provisions set forth in CCS Specific Plan Section 6.A.2.a, which regulates the number of vehicle trips that can be generated by development within SP Area A according to the Cumulative Automobile Trip Generation Potential (CATGP). This aspect of the Specific Plan Amendment is required to address the Project's trips due to the addition of Development Area 1 to SP Area A.

3.3.6.2 Pico Properties

Development activities within the Pico Properties would occur in accordance with the existing zoning designation of C2-1VL-O. In addition, no change to the existing height or building setbacks for the 10271 and 10275 Pico Boulevard buildings would occur under the Project.

3.3.7 Access and Circulation

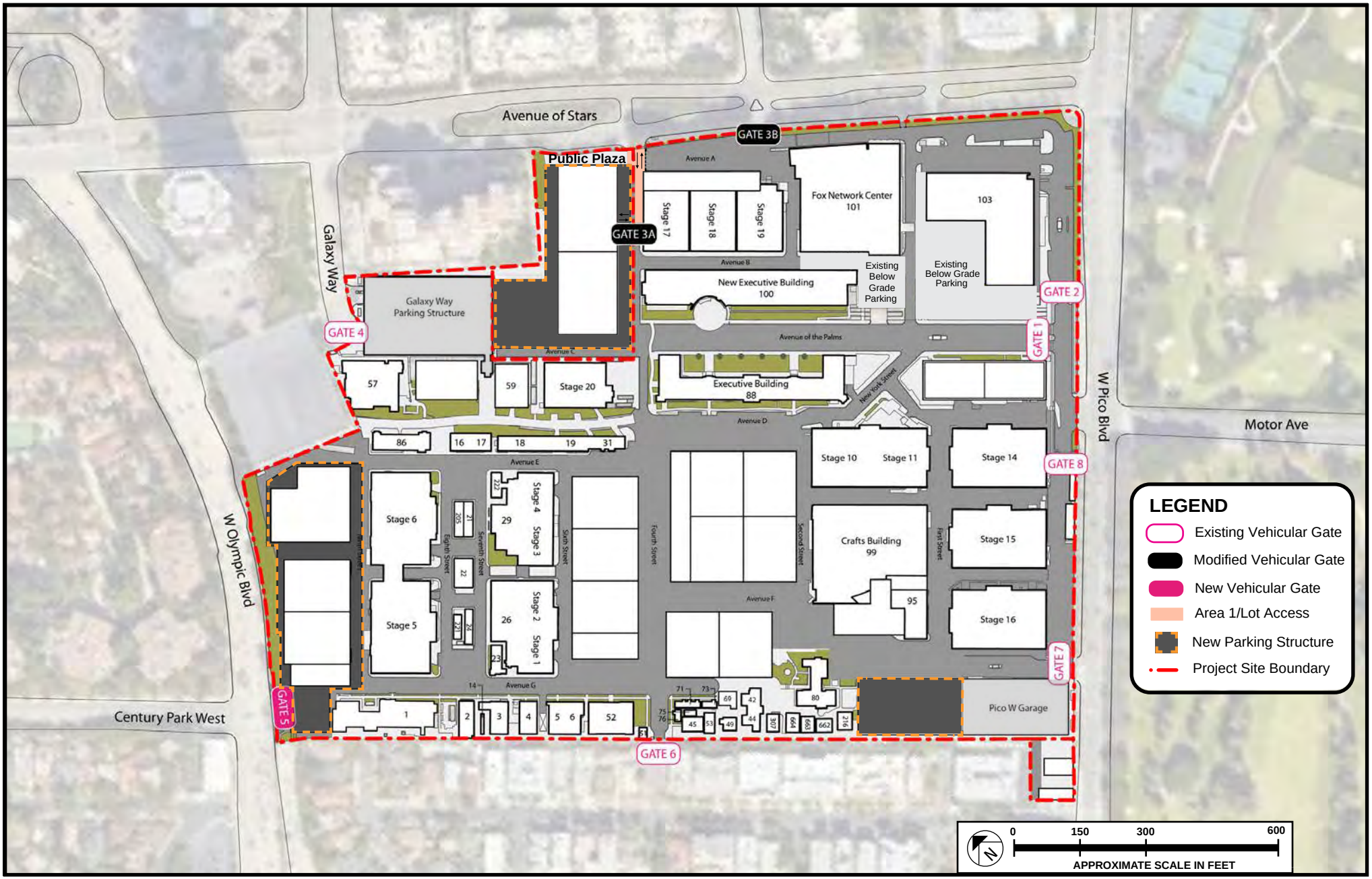
3.3.7.1 CCS Specific Plan

The Project would enhance pedestrian, bicycle, and vehicular access to the Project Site portion of the CCS Specific Plan and modify the gateways to this portion of the Project Site to better distribute traffic to the street system surrounding the Project Site. A detailed discussion of the access and circulation that would be provided within the Project Site portion of the CCS Specific Plan is included below.

3.3.7.1.1 Vehicular Access

Vehicle access to the Project Site portion of the CCS Specific Plan currently occurs at six access points, as shown in **Figure 15**, *Project Vehicle Access and Parking*. The main entrance, located at Pico Boulevard and Motor Avenue provides access to Gates 1, 2, and 8. The primary service entrance is located to the west and provides access to the Pico West Parking Structure via Gate 7. Secondary entrances are located along Avenue of the Stars and Galaxy Way. Gate 3, located along Avenue of the Stars at Empyrean Way, provides access to the eastern area of the Project Site portion of the CCS Specific Plan. Gate 4, located on Galaxy Way, provides access to the Galaxy Parking Structure and other areas within the Project Site portion of the CCS Specific Plan. Other access points that are limited in use are located at Gate 5, located within the 2121 Avenue of the Stars Parking Structure which is used on a limited basis by FOX employees, and Gate 6,

located at the end of Tennessee Avenue which is used by emergency service providers, production vehicles, and equipment on a limited basis.



SOURCE: RIOS - February 2024; Meridian Consultants - 2024

FIGURE **15**

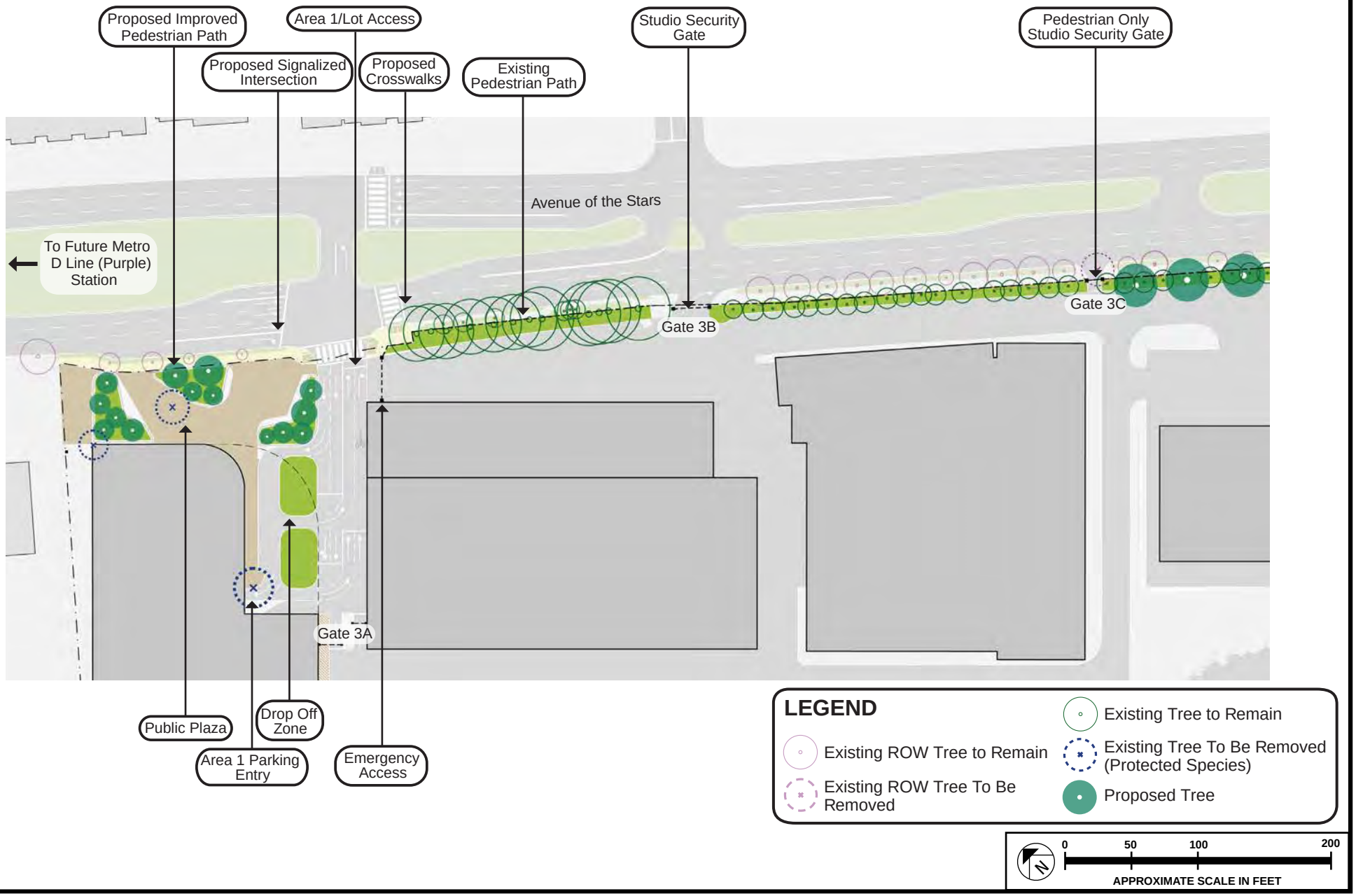
Vehicle Access and Parking

The existing vehicular access gateways to the Project Site portion of the CCS Specific Plan at Pico Boulevard and Motor Avenue (providing access to Gates 1, 2, and 8), at Galaxy Way (Gate 4), at Pico Boulevard near the westerly end of the Project Site portion of the CCS Specific Plan (Gate 7), and the limited access that occurs at Tennessee Avenue (Gate 6) would be maintained. Truck access, excluding production trucks, would occur via the new entry on Avenue of the Stars (existing location of Gate 3A) to serve Development Area 1 and via the Pico West Gate (Gate 7) to serve Development Areas 2, 3, 4, 5, and 6. Production trucks would enter the Project Site portion of the CCS Specific Plan primarily via Gate 7 as well as Gate 6 on a limited basis and exit the Project Site portion of the CCS Specific Plan via Gates 3B and 7 as well as Gate 6 on a limited basis. All truck loading/unloading would occur throughout the Project Site portion of the CCS Specific Plan.

As part of Project development, the existing vehicular access from Avenue of the Stars would be reconfigured as part of Subarea 1A development. Specifically, Gate 3A, currently used for ingress only, would be relocated approximately 200 feet to the west and the existing Gate 3A entry would be improved to provide for ingress and egress, and the intersection of this entry and Avenue of the Stars would be signalized. Two ingress lanes and two egress lanes (right-turn and left-turn only) would be provided at this new access point. This new entry would provide public access to the Development Area 1 office uses, as well as providing access to Gate 3A, a secured access point to the Project Site portion of the CCS Specific Plan.

The existing access at Avenue of the Stars and Empyrean Way (Gate 3B, currently used for egress only) would be right-turn only and limited to emergency access and production vehicle exiting. The center median in Avenue of the Stars would be modified to accommodate the proposed changes to Project Site access at this location.

A conceptual design for the new Avenue of the Stars entrance, including Gates 3A and 3B, is shown in **Figure 16***, Conceptual Site Plan -- Avenue of the Stars Entrance*.

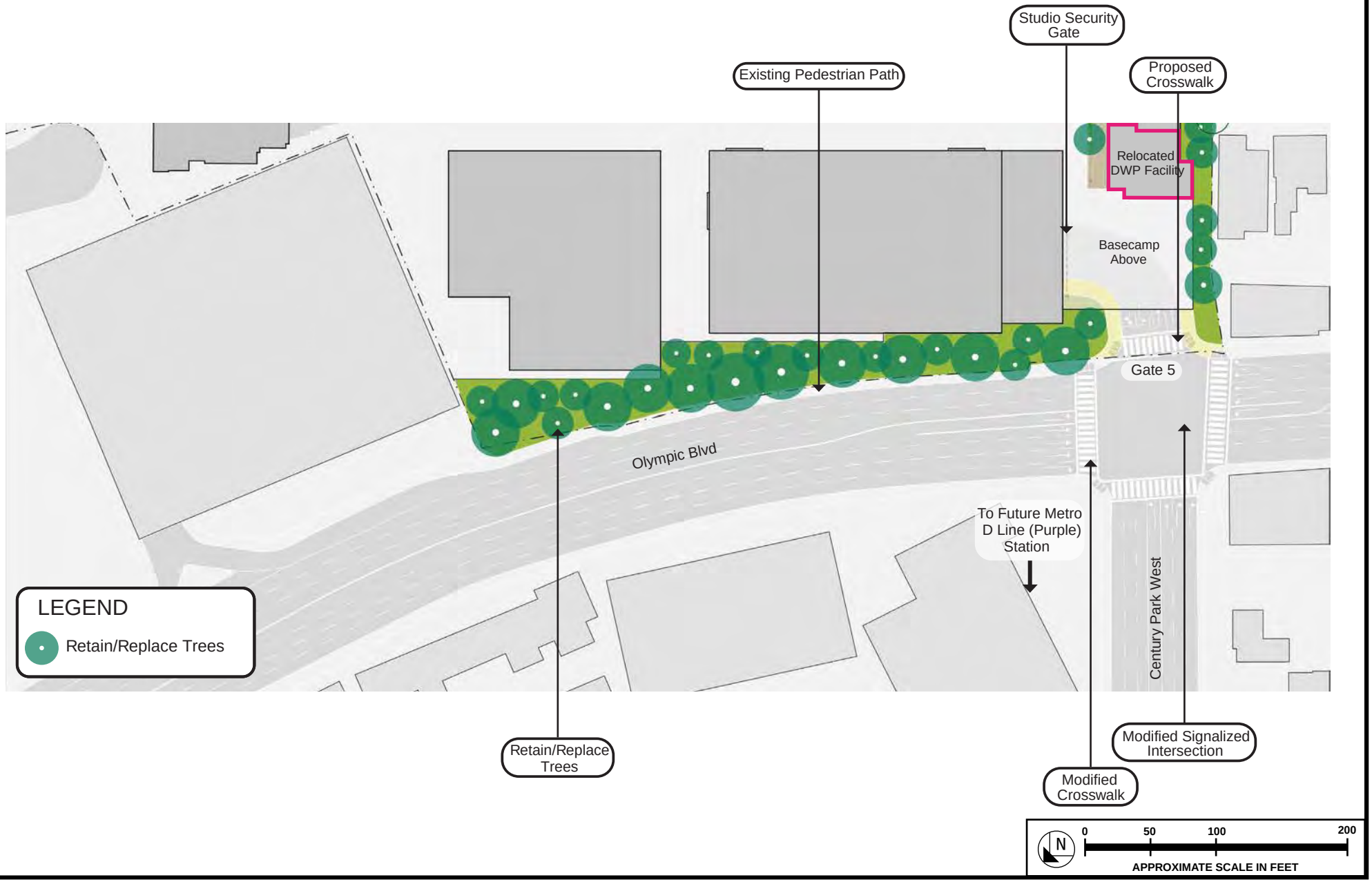


SOURCE: RIOS - January 2023; Meridian Consultants - 2023

FIGURE **16**

Conceptual Site Plan - Avenue of the Stars Entrance

In addition, the existing Gate 5, accessed from Olympic Boulevard through the 2121 Avenue of the Stars parking structure, would be closed and a new relocated vehicular access point on Olympic Boulevard would be developed as part of Development Area 5. Specifically, full vehicular ingress and egress, as well as right- and left-turn lanes, would be developed directly from Olympic Boulevard opposite Century Park West (relocated Gate 5), and the Olympic Boulevard and Century Park West intersection signal would be modified to add a south leg. The relocated Gate 5 would directly connect to the proposed parking garage within Development Area 5 and would be integrated to align with the existing elevation of Olympic Boulevard at Century Park West. A conceptual design for the new Olympic Boulevard entrance is shown in **Figure 17***, Conceptual Site Plan -- Olympic Boulevard Entrance*.



SOURCE: RIOS - January 2023; Meridian Consultants - 2023

FIGURE **17**

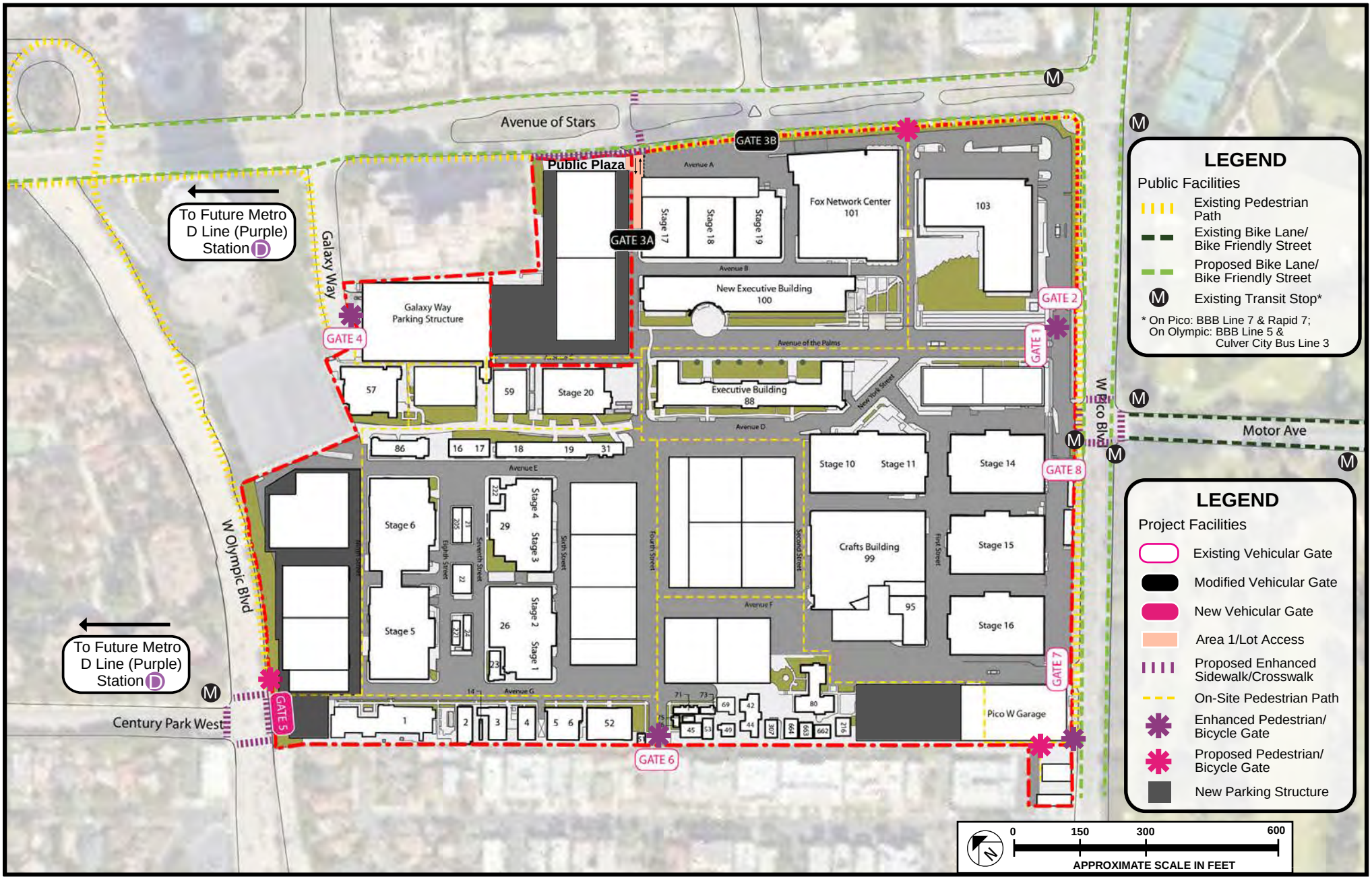
Conceptual Site Plan - Olympic Boulevard Entrance

Within the Project Site portion of the CCS Specific Plan, emergency access is provided by designated fire lanes. In general, development within the Project Site portion of the CCS Specific Plan would maintain existing fire lanes; however, fire lanes may be altered or relocated subject to the approval of the Los Angeles Fire Department.

3.3.7.1.2 Bicycle and Pedestrian Access

Existing bicycle facilities in the Project area include a designated bicycle lane along Motor Avenue between Pico Boulevard and Monte Mar Drive. In addition, Tennessee Avenue, west of the Project Site, is designated as a "Bicycle Friendly Street."[20] Planned improvements adjacent to the Project Site per the City of Los Angeles 2010 Bicycle Plan and Mobility Plan 2035, as shown in **Figure 18***, Project Pedestrian and Bicycle Access*, include the provision of bicycle lanes on Avenue of the Stars and Pico Boulevard. Project development would include enhanced bicycle/pedestrian gateways at Gate 1 and Gate 4, the Tennessee Avenue gate (Gate 6), and the existing pedestrian entrance west of Gate 7, which would be modified to provide bicycle access. New bicycle/pedestrian access would also occur via the public plaza along Avenue of the Stars within Development Area 1, along Avenue of the Stars in proximity to Buildings 101 and 103, and at relocated Gate 5. These enhanced and new pedestrian/bicycle access points would provide access to multiple pathways that facilitate pedestrian and bicycle travel between the Project Site portion of the CCS Specific Plan and the Metro D Line Century City/Constellation Station (scheduled to be in operation in 2025). In addition, these bicycle improvements would connect to the planned bicycle routes described above.

[20] City of Los Angeles Department of City Planning, 2010 Bicycle Plan, Appendix A: Definitions and Glossary, March 1, 2011. A bicycle friendly street includes at least two engineering street calming treatments in addition to signage and shared lane markings.



SOURCE: RIOS - January 2023; Meridian Consultants - 2023

FIGURE **18**

Pedestrian and Bicycle Access

In addition to the bicycle improvements described above, integrated mobility facilities would be developed throughout the Project Site portion of the CCS Specific Plan, including sidewalk, crosswalk, and signage improvements at both the new and modified entrances to improve safety and enhance multi-modal First/Last Mile connectivity to the Central Mobility Hub located at the Metro D Line Century City/Constellation Station. The integrated mobility facilities within the Project Site portion of the CCS Specific Plan would also include, but not limited to, shared-bicycle facilities, bicycle parking access, carpool/vanpool parking, and dynamic informational bulletin boards, and would provide multi-modal options and First/Last Mile connection support for employees and visitors to the Project Site. The integrated mobility facilities within the Project Site portion of the CCS Specific Plan would also provide convenient pedestrian access routes between the interior areas of the Project Site and the pedestrian gates, as well as enhance the connections to the Central Mobility Hub and the adjacent exterior multi-modal and/or transit facilities located in proximity to the perimeter of the Project Site.

3.3.7.2 Pico Properties

Under the Project, the existing access between SP Area B and the 10267 Pico Boulevard parcel would be upgraded to provide access to the entirety of the Pico Properties. In addition, the existing gated alley, which provides access to Fox Hills Drive, would remain under the Project to allow the employees of the child care facility to access this portion of the Project Site.

3.3.8 Project Frontages

The Project Site predominantly interacts with the public realm through its frontages and access points along Avenue of the Stars, Olympic Boulevard, and Pico Boulevard, with limited frontage and access along the western boundary of the Project Site portion of the CSS Specific Plan and along Fox Hills Drive at the Pico Properties.

The Project Site portion of the CCS Specific Plan provides multi-modal entry/exit points occurring via the existing gates and proposed gates as described above and maintains a perimeter wall and controlled access for security purposes while proposing strategic connections to the public realm with regard to Development Areas 2 through 6.

Within SP Area A along Avenue of the Stars, the Project would create a public plaza for the Subarea 1A high-rise general office building. This public plaza would also serve as a primary entrance for pedestrians to Subarea 1A as, well as providing a connection to SP Area B. This pedestrian plaza and entrance would be located a short distance (roughly 0.3 miles) from the future Metro D Line Century City/Constellation Station located at Avenue of the Stars and

Constellation Boulevard. The new plaza and access point would activate the pedestrian experience along Avenue of the Stars but would also create a direct path to the new station to encourage the use of public transportation. This short and direct connection with the future Metro D Line station would support pedestrians and transit riders. Continuing along Avenue of Stars, the introduction of additional Specialty Space adjacent to soundstages 17, 18, and 19 would be concealed mainly by the preservation of the existing mature trees and streetscape. No changes to the existing trees and streetscape are proposed along Avenue of the Stars, south of the proposed crosswalk south of the new Avenue of the Stars access point. The Project also proposes a new pedestrian and bicycle pedestrian connection from the Project Site portion of the CCS Specific Plan to Avenue of the Stars in proximity to Buildings 101 and 103. This new pedestrian and bicycle access point would provide another pathway that facilitates pedestrian and bicycle travel between this portion of SP Area B and the future Metro D Line Century City/Constellation Station near the intersection of Avenue of the Stars and Constellation Boulevard.

Along Olympic Boulevard, the Project would introduce a new parking garage and a new multi-modal entrance into SP Area B. The existing slope along Olympic Boulevard allows most of the new Development Area 5 parking garage to be concealed and therefore screened from the adjacent area. The new streetscape along Olympic Boulevard would be enhanced with a landscape buffer within SP Area B, which would improve the visual appearance along this Project frontage compared to existing conditions, while ensuring slope stability and increasing biodiversity.

Along Pico Boulevard, the existing character along the Project Site frontage within SP Area B would be generally maintained. As such, the billboards facing Pico Boulevard would be preserved in place with their dynamic change of content to reflect the changing productions within SP Area B. Additionally, Building 89 would be preserved through adaptive reuse. In this process, Building 89's façade would remain intact while the interior space is retrofitted to accommodate new soundstages and production support uses. Thus, the pedestrian experience of Building 89 would remain substantially the same under the Project since the exterior walls would remain the same as well. Continuing to the west, the Pico West Parking Structure would remain with additional parking facilities developed as an extension on the north side of this structure. The Project Site frontage along Pico Boulevard within the Pico Properties would change with the demolition of the building at 10267 Pico Boulevard. This part of the Project Site frontage along with the existing fence and wall between the 10271 and 10275 Pico Boulevard buildings would be replaced with a security barrier that would separate the child care facility's outdoor play areas from the street. No changes are proposed to the facades of the 10271 and 10275 Pico Boulevard buildings.

Along Fox Hills Drive, Gate 6 within SP Area B at Tennessee Avenue would be modified to permit pedestrian and bicycle access. No other changes are proposed along the SP Area B's western boundary, the western façade of the 10275 Pico Boulevard building, or the existing gated alley that provides access to the Pico Properties.

In addition, mechanical equipment on the rooftops of new structures within the Project Site portion of the CCS Specific Plan would be screened from ground and horizontal plane views outside the Project Site, as well as views from the hotel located north of the Project Site.

3.3.9 Parking

3.3.9.1 CCS Specific Plan

Existing surface parking spaces within the Project Site portion of the CCS Specific Plan are anticipated to be removed as new buildings or landscaped areas are developed and would be replaced with an equal number of new parking spaces, which would not be counted as net new parking spaces and may be developed in any Development Area. A total of up to 9,394 on-site parking spaces would be available for use within the Project Site portion of the CCS Specific Plan at Project buildout. Included in this total are 4,500 currently entitled parking spaces, which include 328 replacement parking spaces, and up to 4,894 net new parking spaces to support Project development. Of these 4,894 net new parking spaces, a total of 2,896 parking spaces would be located within Subarea 1A. The remaining 1,998 parking spaces would support development within Subareas 2A, 3A through 3F, 4A, 5A, and 5B. Parking within these subareas would be managed on a site-wide basis (i.e., the parking that supports a building may not be located entirely below the building).

New parking within the Project Site portion of the CCS Specific Plan would be provided at the rate of 3.0 spaces per 1,000 gross square feet of floor area. In addition, up to 500 parking spaces for

production vehicles[21] that currently operate within SP Area B would occur as either surface parking spaces or incorporated into SP Area B's parking facilities.[22, 23]

In general, new parking within the Project Site portion of the CCS Specific Plan would be provided in below-grade structures located underneath new buildings within Development Areas 1 and 5. Parking within Subarea 6A would expand the parking supply provided within the existing Pico West Parking Structure. The maximum depth of excavation for subterranean parking structure construction within the Project Site portion of the CCS Specific Plan would be approximately 75 feet for the Development Area 5 subterranean parking structure and would result in approximately 334,460 cubic yards of excavation at this location. The locations for the parking to be developed as part of the Project are shown in **Figure 15**.

3.3.9.2 Pico Properties

The Pico Properties currently has nine surface parking spaces, which would remain for use by the employees of the child care facility. Additional parking, as required, would be available within the existing Pico West Parking Structure.

3.3.10 Streetscape/Landscaping

Project development would include a variety of landscape and streetscape improvements, as shown in the Rendered Conceptual Site Plan **(Figure 10)**. Streetscape and landscaping improvements along these streets would primarily occur within the building setback areas within the Project Site portion of the CCS Specific Plan. In addition, landscaping and open space elements would be located throughout the Project Site using a cohesive plant palette. Planting zones and associated palettes would incorporate a water-efficient landscape design, including the use of resilient, native, or drought-tolerant tree, shrub, and groundcover species, smart irrigation systems, and permeable surfaces. On-site landscaping under the Project would also incorporate replacement trees as appropriate.

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[21] Production vehicles include trucks or tractor-trailers used to transport production equipment and/or support facilities typically used in location filming outside the Project Site. Material transport vehicles and production support vehicles used in conjunction with soundstages or on-site filming are also classified as production vehicles. These production vehicle parking spaces currently exist within the Project Site portion of the CCS Specific Plan and, therefore, are part of the Project baseline. The 500 production vehicle parking spaces are included in the parking space totals in order for these parking spaces to be incorporated into the elements of the Project.

[22] The 500 parking spaces for production vehicles that currently operate within the Project Site portion of CCS Specific Plan are not part of the parking supply regulated by the Century City South Specific Plan.

[23] The parking facilities that would include parking spaces for production vehicles would be designed to have sufficient height and turning radii to accommodate these vehicles.

There are a total of 2,124 trees within the Project Site consisting of hedges, topiary, palms, tree-like monocots, and 'tree' form trees.[24] Project development could result in the removal of up to 774 on-site trees.[25] A total of 24 Ordinance-Protected (Protected) tree species occur on the Project Site consisting of three coast live oak trees and 21 western sycamore trees. Based on historical aerial imagery, it appears that based on the location and the young age of many of the Protected trees, the 24 coast live oaks and western sycamores on the Project Site were planted in the landscape and are not naturally occurring. If these trees are subject to the City's Protected Tree and Shrub Ordinance, Project development would result in the planting of replacement trees of the same species as those removed. Existing street trees within the public right-of-way would be preserved throughout the Project Site's perimeter along Olympic Boulevard, Galaxy Way, Avenue of the Stars, Pico Boulevard, and Fox Hills Drive (i.e., no street trees located in the public right-of-way would be removed as a result of implementation of the Project).

3.3.11 Outdoor Special Events

Outdoor special events currently take place throughout the year at various locations within the Project Site portion of the CCS Specific Plan. Up to 50 special events have occurred annually on the Project Site. These outdoor special events can include large groups of people, as well as the use of amplified sound equipment and portable nighttime lighting. Outdoor special events would continue throughout construction and buildout of the Project Site portion of the CCS Specific Plan. During construction, outdoor special events currently held within Development Area 3 in the area west of Buildings 57, 58, and 59 would be moved to other locations within the Project Site portion of the CCS Specific Plan, which currently host outdoor special events. Under the Project, up to 14 new outdoor special events would occur on annual basis. As such, a total of 64 existing and new outdoor special events would occur annually at Project buildout. Special events would mostly occur during the evening and nighttime hours between 7:00 p.m. and 12:00 a.m. with a few events (1 to 3 per year) during the daytime hours between 11:00 a.m. and 6:00 p.m. Outdoor special events are generally located internal to the Project Site portion of the CCS Specific Plan. In other words, existing on-site buildings would be located between these outdoor special event sites and off-site locations. No outdoor special event areas are currently located or proposed within the Pico Properties.

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[24] Of the 2,124 on-site trees, 905 are non-protected hedge or topiary form tree species, 267 are non-protected palms and other monocot species, and 952 are 'tree' form trees (928 of which are non-protected 'tree' form species).

[25] Of the 774 potential tree removals, 232 would be non-protected hedge or topiary form tree species, 51 would be non-protected palms and other monocot species, and 491 would be 'tree' form trees (484 of which are non-protected 'tree' form species).

3.3.12 Infrastructure Plan

3.3.12.1 CCS Specific Plan

With regard to electricity infrastructure, the infrastructure plan for the Project Site portion of the CCS Specific Plan anticipates that Subareas 1A, 5A, and 5B would receive electrical service via direct feeds from existing off-site Los Angeles Department of Water and Power (LADWP) infrastructure, whereas Subareas 2A, 3A through 3F, 4A, and 6A would receive their electrical feeds via additional on-site substation capacity. Specifically, the existing on-site Olympic Substation, located towards the northwest corner of SP Area B, would be relocated during buildout of SP Area B with a new substation located in the same general area of SP Area B. This new substation would have enough capacity to meet the electricity demand currently provided by the existing Olympic Substation as well as the electricity demand associated with SP Area B development within Subareas 2A, 3A through 3F, 4A, and 6A.[26]

In addition, per the existing Century City South Specific Plan, as well as the proposed Specific Plan Amendment, future utility improvements along Avenue of the Stars would be placed underground.

3.3.12.2 Pico Properties

Utility service to the Pico Properties is currently provided via connections to the off-site utility infrastructure located within Pico Boulevard and Fox Hills Drive. The Pico Properties would continue to be served by the existing utility connections that serve this portion of the Project Site, although these connections may be upgraded and/or the connection points relocated under the Project.

3.3.13 Sustainability

Energy efficiency and water conservation strategies would be considered in the design, construction, and operation of on-site facilities, with specific strategies developed during the design process for future development projects. Sustainability features that may be incorporated into the Project, in addition to existing on-site sustainability initiatives, include, but are not limited to, the following:

[26] Subarea 6B is the existing Galaxy Garage. No Project activities requiring additional electrical infrastructure are proposed within Subarea 6B.

- Leadership in Energy and Environmental Design (LEED) Platinum certification for certain studio and general office development within the Project Site;
- Solar panels;
- Enhanced mobility infrastructure including bicycle facilities, wayfinding, and enhanced pedestrian paths;
- Electric vehicle (EV) capabilities;
- Use of low carbon, local, and reclaimed hardscape materials;
- Green walls;
- Water reuse and recycled water systems; and
- Drought-tolerant landscaping.

3.4. REQUESTED PERMITS AND APPROVALS

Permits and approvals required from the City of Los Angeles, as the Lead Agency under the California Environmental Quality Act (CEQA), for development of the Project are anticipated to include, but are not limited to, the following:

1. Pursuant to LAMC Section 11.5.6 A, a **General Plan Amendment** to change the land use designation for a portion of the Project Site from Limited Industrial to Regional Commercial;
2. Pursuant to LAMC Section 11.5.7 G, a **Specific Plan Amendment** to the Century City South Specific Plan to update the permitted scope and boundaries of development proposed for Specific Plan Areas A and B;
3. Pursuant to LAMC Section 12.32 F, a **Zone Change** from [Q] CCS-O to [Q]C2-2-O for a portion of the Project Site and to modify the [Q] Conditions pursuant to Ordinance No. 168,859 to be consistent with the changes proposed by the Specific Plan Amendment;
4. Pursuant to LAMC Section 12.24 W.1, a **Main Conditional Use Permit** for the on-site sale and consumption of alcoholic beverages;
5. Pursuant to LAMC Section 13B.4.2, a **Project Compliance** for development within the Century City South Specific Plan;
6. Pursuant to CA Government Code 65864-65869.5, a **Development Agreement**;
7. Pursuant to LAMC Section 17.50, a **Parcel Map** for the subdivision of one lot into two ground lots, and a haul route for the export of up to a maximum of 669,127 cubic yards of soil; and
8. Other discretionary and ministerial permits deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

3.5. RESPONSIBLE PUBLIC AGENCIES

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

I. AESTHETICS

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

Senate Bill (SB) 743 (Public Resources Code [PRC] Section 21099(d)) sets forth guidelines for evaluating project transportation impacts for transit-oriented infill projects 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 a "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 "infill site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This State law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

The related City of Los Angeles (City) Department of City Planning Zoning Information File (ZI) ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA."[27] ZI No. 2452 also states that a project shall be considered to be within a TPA if all parcels within the project have no more than 25 percent of their area farther than one-half mile from the major transit stop. It follows from this provision that if all parcels within the project have more than 25 percent of their area farther than one-half mile from the major transit stop, the project as a whole would not be classified as being within a TPA.

Based on the definition of a major transit stop as set forth in PRC Section 21064.3, the planned Metro D Line Century City/Constellation Station located near the northeastern corner of Avenue of the Stars and Constellation Boulevard qualifies as a major transit stop with regard to the Project Site. Specifically, this Metro D Line station is scheduled to open in 2025, and the Project Site is located approximately 0.33 mile at its closest point from this station and 0.72 mile at its farthest point from this station. In addition, while two Big Blue lines travel along Pico Boulevard, neither one meets the headway criterion set forth in PRC Section 21064.3. Thus, as approximately 62.9 percent of the Project Site is located more than one-half mile from the nearest Metro D Line station and the bus lines in the area do not meet the specified headway criterion, the Project as a whole would not be classified as a TPA for the purposes of assessing the Project's aesthetics impacts in terms of the provisions of SB 743 and ZI No. 2452.

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

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

Potentially Significant Impact. A scenic vista is a panoramic view of one or more visual resources, such as a mountain range or the urban skyline.[28] Panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are typically associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies. Focal views are also relevant when considering this question from Appendix G of the CEQA Guidelines. Examples of focal views include natural landforms, public art/signs, historic buildings, and important trees.

The Project Site is located within Century City, an urban district of the City of Los Angeles, and, as such, views near the Project Site are largely constrained by adjacent structures. Notwithstanding, scenic vistas in the Project area include the following: (1) Century City skyline, (2) Avenue of the Stars as a City designated Scenic Highway, (3) Cheviot Hills Recreation Center, (4) Rancho Park Golf Course, and (5) Santa Monica Mountains. These scenic vistas in conjunction with the trees and landscaping within public and private locations, as well the open sky, collectively contribute to the overall aesthetic character of the Project area.

SP Area B also includes a historic district. “Contributors”[29] to the historic district are for the most part internal to the SP Area B site and, therefore, not visible from off-site public vantage points surrounding the Project Site. However, six of the contributors to the on-site historic district can be seen from publicly-accessible locations. Four of these six contributors are located near Pico Boulevard (Stages 14 through 16 and Building 89), one contributor (Stage 8) can partially be seen from Olympic Boulevard through the on-site landscaping in this area, and one contributor (Building 57) can partially be seen at the end of the Galaxy Way cul-de-sac west of Avenue of the Stars.

[28] City of Los Angeles, L.A. CEQA Thresholds Guide, 2006. As defined further therein, “[T]he term "views" generally refers to visual access to, or the visibility of, a particular sight from a given vantage point or corridor. "Focal views" focus on a particular object, scene, setting, or feature of visual interest; "panoramic views" or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance.” (page A.2-1).

[29] A “Contributing Building” or “Contributor” is defined in the 1994 HPP as a building which adds to the historical integrity or architectural qualities that along with similarly designated buildings collectively form a historic district.

The Project Site is not located along or near a State-designated Scenic Highway or associated view corridor.[30] The closest officially designated State Scenic Highway is the Topanga Canyon State Scenic Highway, approximately 9.5 miles west of the Project Site.[31,32] While the Project Site is not located within a State-designated Scenic Highway or associated view corridor, Mobility Plan 2035 designates Avenue of the Stars, between Santa Monica and Pico Boulevards, as a City scenic highway. The scenic resources that define Avenue of the Stars as a designated City scenic highway are the street's wide landscaped median and fountains.[33]

As described in Section 3, Project Description to the Initial Study, the Project Site portion of the CCS Specific Plan would be developed in accordance with proposed height limits, as shown in **Figure 14**, *Proposed* CCS *Specific Plan Allowable Building Heights*, whereas no increase in the height of the buildings that compose the Pico Properties is proposed. Under these height limits, building heights within the Project Site portion of the CCS Specific Plan would range from 315 to 950 feet AMSL with corresponding building heights that range from 55 feet to up to 650 feet in height above grade. Because the Project and its heights would modify on-site conditions, scenic vistas, including views of on-site historic resources, within the Project area may be affected by the Project. Therefore, further analysis of potential impacts to scenic vistas will be provided in the EIR.

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

No Impact. As described above, the Project Site is not located along or near a State-designated Scenic Highway or associated view corridor.[34] The closest officially designated State Scenic Highway is the Topanga Canyon State Scenic Highway, approximately 9.5 miles west of the

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[30] California Department of Transportation, "California Scenic Highway Mapping System." https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed February 7, 2023.

[31] California Department of Transportation, "California Scenic Highway Mapping System." https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed February 7, 2023.

[32] Caltrans classifies Pacific Coast Highway (State Route [SR] 1) between Venice Boulevard and US-101 in Ventura County as eligible to be designated as a State Scenic Highway. As such, the roadway has not been officially designated as a State Scenic Highway.

[33] City of Los Angeles, Mobility Plan 2035, Appendix B: Inventory of Designated Scenic Highways and Guidelines, 2016, p. 170.

[34] California Department of Transportation, "California Scenic Highway Mapping System." https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed February 7, 2023.

Project Site.[35,36] Accordingly, the Project would not substantially damage scenic resources within a State-designated scenic highway as no scenic highways are located adjacent or near the Project Site. As such, no impacts would occur, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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?

Potentially Significant Impact. As previously described, the Project is located in an urbanized area. As such, this analysis will focus on whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

As detailed in Section 3, Project Description, of this Initial Study, FOX FUTURE provides the framework by which the Applicant would develop new studio-related uses that respond to the evolving media industry, as well as a general office use that reflects the high-rise identity that defines Century City that also complements the growth that continues to occur in Century City. The Project proposes the development of 2,106,092 square feet of new studio-related and general office uses, as well as parking facilities and circulation improvements, landscaping, and open space. More specifically, the Project would permit approximately 1,640,585 square feet of net new floor area, the retention of an estimated 1,344,058 square feet of existing uses not affected by Project development, and the demolition of up to approximately 465,507 square feet of existing on-site facilities. These attributes of the Project, in conjunction with limitations on building heights and the other development standards applicable to the Project, require analysis to assess consistency with applicable zoning and other regulations governing scenic quality. Therefore, further analysis of potential impacts related to conflict with applicable zoning and other regulations governing scenic quality will be provided in the EIR.

[35] California Department of Transportation, "California Scenic Highway Mapping System." https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed February 7, 2023.

[36] Caltrans classifies Pacific Coast Highway (SR-1) between Venice Boulevard and US-101 in Ventura County as eligible to be designated as a State Scenic Highway. As such, the roadway has not been officially designated as a State Scenic Highway.

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

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

Glare occurs during both daytime and nighttime hours. Daytime glare is caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials, and, to a lesser degree, from broad expanses of light-colored surfaces. Daytime glare generation is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely composed of highly reflective glass or mirror-like materials from which the sun can reflect, particularly following sunrise and prior to sunset. Daytime glare generation is typically related to sun angles, although glare resulting from reflected sunlight can occur regularly at certain times of the year. Glare can also be produced during evening and nighttime hours by artificial light directed toward a light-sensitive land use. Project activities during construction and operations could create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, further analysis of potential impacts related to light and glare during Project construction and operations will be provided in the EIR.

II. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. 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 1220(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 within a developed and heavily urbanized area. In addition, no agricultural uses or other related activities currently occur on the Project Site or within the Project vicinity. The California Department of Conservation Farmland Mapping and Monitoring Program does not identify the Project Site or its surroundings as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, or Grazing Farmland.[37] As such, no impacts would occur, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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

No Impact. No farmland or agricultural activity exists on or near the Project Site. The Project Site is not zoned for agricultural use or subject to a Williamson Act contract.[38] The Project Site is zoned for studio and commercial uses pursuant to the Century City South Specific Plan and the C2-IVL-O zoning for the Pico Properties. Accordingly, the Project would not conflict with agricultural zoning or a Williamson Act contract. As such, no impacts would occur, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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. The Project Site is currently zoned [Q]CCS-O and C2-1VL-O and is not designated or zoned for forestland or timberland. The Project Site is developed with urban land uses that do not meet the PRC definitions of forestland or timberland. Accordingly, the Project would not conflict with existing zoning for, or cause the rezoning of, forest land or timberland. As such, no

[37] California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, http://www.conservation.ca.gov/dlrp/fmmp, accessed February 7, 2023.

[38] California Department of Conservation, Division of Land Resource Protection, Williamson Act Program, http://www.conservation.ca.gov/dlrp/lca, accessed February 7, 2023.

impacts would occur, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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 not used, designated, or zoned for forestland or forest use. The Project Site is located in an urbanized area of the City of Los Angeles. Accordingly, the Project would not result in the conversion of forest land to non-forest use. As such, no impacts would occur, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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 previously discussed, the Project Site and surrounding areas do not contain any farmland or forestland. In addition, the Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance; are not zoned for farmland, agricultural use, or forest land; and do not contain any agricultural or forest uses. Accordingly, the Project would not result in the conversion of farmland to non-agricultural use or forest land to non-forest use. As such, no impacts would occur, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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 6,745-square-mile South Coast Air Basin (Basin). Pursuant to the federal and State Clean Air Acts, within the Basin, the South Coast Air Quality Management District (SCAQMD) is required to reduce emissions of criteria pollutants for which the Basin is in nonattainment (i.e., ozone [O_3], particulate matter less than 2.5 microns in size [PM2.5], particulate matter less than 10 microns in size [PM_{10}], and lead).[39] The SCAQMD's 2022 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the

[39] Partial Nonattainment designation for lead for the Los Angeles County portion of the Basin only.

economy, community development and the environment.[40] With regard to future growth, SCAG has prepared the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2020-2045 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, including, but not limited to, emissions associated with energy usage, resource and water consumption, and vehicle trips. As a result, development of the Project may have a potential to conflict or obstruct implementation of the SCAQMD's AQMP. Therefore, further analysis of potential impacts related to the Project's consistency with the SCAQMD's AQMP will be provided 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 would result in the emission of air pollutants in the Basin, which is currently in nonattainment of federal air quality standards for O_3, $PM_{2.5}$ and lead, and state air quality standards for O_3, PM_{10}, and $PM_{2.5}$. As such, implementation of the Project may potentially contribute to air quality impacts, which could cause a cumulative impact in the Basin. Therefore, further analysis of potential impacts related to cumulative air pollutant emissions associated with the Project will be provided in the EIR.

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

Potentially Significant Impact. As discussed above, the Project would result in increased short- and long-term air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Existing sensitive receptors in the Project area include residential uses, recreational facilities, and schools. As such, the Project may expose sensitive receptors to substantial pollutant concentrations. Therefore, further analysis of the Project's potential to result in substantial adverse impacts to sensitive receptors will be provided in the EIR.

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

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

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

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

Based on the above, potential odor impacts during construction and operation of the Project would be less than significant, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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 Game 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 Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c.	Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e.	Conflict with any local policies or ordinances protecting biological resources, such as 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 a highly urbanized area and is currently developed with buildings, surface parking areas, and landscaping. Landscaping within the Project Site is limited to ornamental landscaping and hardscape features. Given the urbanized nature of the Project area and the fact that the Project Site has already been disturbed, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings. Based on the lack of habitat on the Project Site, it is unlikely any candidate, sensitive, or special statues species listed by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS) would be present on-site. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City.[41] Accordingly, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW or USFWS. As such, impacts would be less than significant, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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. As previously indicated, the Project Site is developed and located in an urbanized area. No riparian or other sensitive natural community exists on the Project Site or in the surrounding area.[42,43] No watercourses are present within or adjacent to the Project Site that have the potential to support riparian vegetation. Furthermore, the Project Site and surroundings are not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined

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

42 California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), https://wildlife.ca.gov/Data/BIOS/, accessed February 7, 2023.

43 United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed February 7, 2023.

by the City or County of Los Angeles.[44,45] In addition, there are no other riparian or other sensitive natural communities identified by the CDFW or the USFWS.[46,47,48] Further, no riparian or other sensitive natural communities as identified in the City or regional plans or in regulations by the CDFW or USFWS are located on or adjacent to the Project Site. Accordingly, implementation of the Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities. As such, no impacts would occur, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

c. Would the Project have a substantial adverse effect on 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 previously indicated, the Project Site is developed and located in an urbanized area. No water bodies or State or federally protected wetlands or similar hydrological feature are located on or adjacent to the Project Site.[49] Accordingly, implementation of the Project would not result in any adverse impacts to State or federally protected wetlands. As such, no impacts would occur, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

d. Would the Project interfere substantially with the movement of any 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. The Project Site, as described above, is located in an urbanized area that is currently developed with buildings, surface parking areas, and landscaping. In addition, the areas surrounding the Project Site are fully developed, with the exception of the Cheviot Hills Recreation Center, Rancho Park Golf Course, and Hillcrest Country Club golf course, which all include substantial trees, vegetation, and open space. However, these uses are developed with active and passive recreational uses and, thus, are not expected to provide linkages to natural open space areas or serve as a wildlife corridor. Furthermore, the Project Site

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

45 Los Angeles County, Los Angeles County General Plan, Figure 9.3, Significant Ecological Areas and Coastal Resource Areas Policy Map, October 2019.

46 California Department of Fish and Wildlife, BIOS, https://wildlife.ca.gov/Data/BIOS/, accessed February 7, 2023.

47 California Department of Fish and Wildlife, CDFW Lands, www.wildlife.ca.gov/Lands, accessed February 7, 2023.

48 U.S. Fish and Wildlife Service, National Wetlands Inventory, https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper, accessed June 15, 2023.

49 U.S. Environmental Protection Agency, NEPAssist, www.epa.gov/nepa/nepassist, accessed February 7, 2023.

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.[50,51]

There are no native resident, migratory fish, or wildlife species or established native resident or migratory wildlife corridors on-site or within the Project area that could impede any use of native wildlife nursery sites as a result of Project implementation. Only wildlife commonly found in developed, urban areas are expected to be found within the Project Site. Therefore, the Project would not substantially change the functionality of the site or impede the movement of wildlife species given the highly urbanized nature of the Project Site.

Moreover, the Project would comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, of any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish and Game Code Section 3503 states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." No exceptions are provided in the Code, and CDFW has never promulgated any regulations interpreting these provisions.

In order to ensure regulatory compliance with the Migratory Bird Treaty Act and California Fish and Game Code, if vegetation removal activities must occur during the nesting season of any migratory bird (February 1 through August 31), a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If any active nests are detected, the area would be flagged with a buffer (ranging between 50 and 300 feet, as determined by the monitoring biologist), and the area would be avoided until the nesting cycle has been completed or the monitoring biologist has determined that the nest has failed.

With compliance with the Migratory Bird Treaty Act, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. As such, Project impacts would be less than significant, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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

[51] Los Angeles County, Los Angeles County General Plan, Figure 9.3, Significant Ecological Areas and Coastal Resource Areas Policy Map, October 2019.

e. Would the Project conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?

Less Than Significant Impact. The City of Los Angeles Protected Tree and Shrub Ordinance No. 186,873 (Protected Tree and Shrub Ordinance) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least four inches in diameter at breast height, as well as the protected shrubs Mexican elderberry and toyon. Trees or shrubs that have been planted as part of a landscape or 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 or shrub, including "acts which inflict damage upon root systems or other parts of the tree or shrub…" and requires that all regulated protected trees and shrubs that are removed be replaced on at least a 4:1 basis with species of a protected variety. Trees that are located within public rights-of-way, parkways, medians, and street trees are also protected under the City's Protected Tree and Shrub Ordinance regardless of species or size.

In 2022, the Los Angeles City Planning Department issued a tree report template (Template) that establishes new provisions that expand the scope of tree surveys conducted for every project in the City that is subject to City Planning Department CEQA review. Specifically, the Template (updated) requires the collection and reporting on additional data beyond that required by the Protected Tree and Shrub Ordinance within the Project Site, as well as off-site areas within specified distances of the Project Site. Some key requirements of the Template include an inventory and assessment of all on-site trees regardless of species or size, an inventory of off-site trees whose protected zones may be impacted by the project, an inventory of all adjacent street trees, photographs of each tree, the mapping of all tree locations and their canopies (driplines) plus protected zones, and the tree expert's opinion as to whether the tree occurs naturally or was planted.

A Tree Inventory Report prepared in accordance with the guidelines set forth by the City of Los Angeles's Protected Tree and Shrub Ordinance and Tree Report Template has been completed and is included as Appendix IS-1 of this Initial Study.[52] This report inventoried tree resources within the entire Project Site as well as immediately adjacent street trees (public right-of-way trees) and off-site, private property trees whose canopies or protected zones overhung the Project

[52] Carlberg Associates, Tree Inventory and Report – FOX FUTURE, 10201 West Pico Boulevard, Los Angeles, California 90064.

Site boundaries. According to the Tree Inventory Report, a total of 2,256 trees, hedges, topiary, palms, and other tree-like monocots were inventoried. Of those, 2,124 are on-site private property trees consisting of hedges, topiary, palms, tree-like monocots, and 'tree' form trees; 83 are located on off-site private properties; and 49 are public right-of-way street trees.

Of the 2,124 on-site trees, 905 are non-protected hedge or topiary form tree species, 267 are non-protected palms and other monocot species, and 952 are "tree" form trees (928 of which are non-protected 'tree' form species). Project development could result in the removal of up to 774 on-site trees, of which 232 would be non-protected hedge or topiary form tree species, 51 would be non-protected palms and other monocot species, and 491 would be 'tree' form trees (484 of which are non-protected 'tree' form species). No public right-of-way street trees or off-site trees located on private property would be removed as a result of Project development.

A total of 25 Ordinance-Protected (Protected) tree species are included in the inventory. The Protected tree species include four coast live oaks (*Quercus agrifolia*) and 21 western sycamore (*Platanus racemosa*) trees. One of the coast live oaks occurs immediately off-site on private property, and given its location may be a naturally occurring tree. As such, 24 of the Protected tree species (three coast live oaks and the 21 western sycamores) are located within the Project Site. Based on historical aerial imagery, the vegetation across most, and possibly all, of the Project Site was removed during the development of the Project Site for entertainment production purposes dating as far back as the early 1920s. Notwithstanding, over the years landscaping, including trees and shrubs, have been introduced onto the Project Site to enhance the aesthetic character of areas within the Project Site, as well as to screen on-site activities within the Project Site portion of the CCS Specific Plan from off-site viewing locations. Based on this information, as well as the locations and the young age of many of the Protected trees, it is the Project arborist's opinion that the 24 coast live oaks and western sycamores on the Project Site were planted in the landscape and are not naturally occurring. No Protected California bay (*Umbellularia californica*) trees, Southern California black walnut (*Juglans californica*) trees, or Mexican elderberry (*Sambucus mexicana*) or toyon (*Heteromeles arbutifolia*) shrubs occur on- or immediately off-site.

The current replacement ratio for permitted Protected tree removals is 4:1. As noted above, the City's Protected Tree and Shrub Ordinance does not regulate the removal of non-protected trees. If subject to the City's Protected Tree and Shrub Ordinance, Project development would result in the removal of seven Protected trees which may require the installation, bonding for, and post-planting monitoring of 28 replacement trees of the same species as those removed. Since the

on-site Protected tree species appear to be planted, they may not be subject to separate permitting or replacement under the City's Protected Tree and Shrub Ordinance. With compliance with the provisions of the City's Protected Tree and Shrub Ordinance and the City's Tree Report Template, the Project would not conflict with any local policies or ordinances protecting biological resources. As such, Project impacts would be less than significant, and no mitigation measures are required. Therefore, no further evaluation of this topic is required in the EIR.

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. The Project Site, as described above, is located in an urbanized area that is currently developed with buildings, surface parking areas, and landscaping and does not support any known habitat or natural community. In addition, the Project Site is not located within any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan area.[53] Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. As such, no impact would occur, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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

V. CULTURAL RESOURCES

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:					
a.	Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Section 15064.5?	☒	☐	☐	☐
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Section 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 State CEQA Section 15064.5?

Potentially Significant Impact. Section 15064.5 of the CEQA Guidelines generally defines a historical resource as a resource that is (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to PRC Section 5020.1(k)); or (3) identified as significant in an historical resources survey (meeting the criteria in PRC Section 5024.1(g)). In addition, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an 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 Project Site portion of the CCS Specific Plan has been used as a studio for approximately 100 years and has played an important role in the history of the film industry in Los Angeles. Several of the structures within SP Area B and all three structures within the Pico Properties were constructed more than 50 years ago. The Historic Preservation Plan that was prepared in 1994 (1994 HPP) found that SP Area B contains a distinctive configuration of buildings and structures that are significant for its association with the development of the motion picture industry in the United States and the concentration of the industry's production facilities in Southern California. The 1994 HPP identified 59 buildings as contributors to this potential historic district. Implementation of the Project may affect historic resources within SP Area B that may warrant potential revisions to the 1994 HPP. In addition, the building located at 10275 Pico Boulevard (Johnsons Buffet) has been identified by SurveyLA as a potential historic resource, although SurveyLA also notes that the building does not meet the threshold of integrity for the National Register or California Register. The Project proposes the demolition of some existing buildings, the adaptive reuse of some buildings, and the construction of new buildings, some aspects of which may affect potentially historic resources that may be present within the Project Site. Therefore, further analysis of the Project's potential impacts on historical resources will be provided in the EIR.

b. Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA §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 portion of the CCS Specific Plan has already been subject to extensive disturbance due to construction of the existing Fox Studio Lot, which includes underground parking located primarily in the southeastern portion of the Project Site. Surface disturbance has also occurred within the Pico Properties due to the construction of the three buildings located therein and related site improvements. Given the extent of the previous disturbance to the underlying soil, any archaeological resources present on the Project Site have likely been disturbed due to previous grading activities. Nevertheless, the improvements associated with Project development may require excavation and grading to a greater depth than previously excavated for the existing development within the Project Site. Thus, the Project could have the

potential to disturb previously undiscovered archaeological resources. Therefore, further analysis of the Project's potential impacts on archeological resources will be provided 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 within 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 development within the Project Site portion of the CCS Specific Plan would require excavation at depths greater than those that have previously occurred on-site, the potential exists to uncover existing but undiscovered human remains. If human remains are discovered during Project construction, work in the immediate vicinity of the construction area would be halted, and the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5. In addition, disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e), which requires that work stop near the find until a coroner can determine that no investigation into the cause of death is required and if the remains are Native American. Specifically, in accordance with CEQA Guidelines Section 15064.5(e), if the coroner determines the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the most likely descendent. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. As such, due to the low potential that any human remains are located on the Project Site and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, Project impacts related to human remains would be less than significant, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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. Portions of the Project Site would be redeveloped with new studio-related and general office uses, as well as parking facilities and circulation improvements, landscaping, and open space. The Project would generate an increased demand for electricity provided by LADWP compared to existing conditions. While development of the Project would not be anticipated to cause wasteful, inefficient, and unnecessary consumption of energy resources, further analysis of the Project's demand on existing energy resources will be provided in the EIR.

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

Potentially Significant Impact. First established in 2002 under SB 1078, California's Renewable Portfolio Standards (RPS) initially required retail sellers of electric services to increase procurement from eligible renewable energy resources to 20 percent of total retail sales by 2017.[54] The program was accelerated in 2015 with SB 350 which mandated a 50 percent RPS by 2030. In 2018, SB 100 was signed into law, which again increased the RPS to 60 percent by 2030 and requires all the State's electricity to come from carbon-free resources by 2045.

LADWP provides electrical service throughout the City and to many areas of the Owens Valley. LADWP generates power from a variety of energy sources, including hydropower, coal, gas,

[54] CPUC, California Renewables Portfolio Standard (RPS) Program, www.cpuc.ca.gov/rps, accessed June 15, 2023.

nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. In accordance with SB 100, LADWP is required to procure at least 60 percent of its energy portfolio from renewable sources by 2030.

Regarding energy efficiency, the California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction, system design, and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2022 Title 24 standards, which became effective on January 1, 2023.[55] The 2022 Title 24 standards include efficiency improvements to the non-residential standards, which include alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1 2019 national standards.[56]

The Project has been designed and would be constructed to incorporate environmentally sustainable building features and systems and construction protocols required by the Los Angeles Green Building Code and the California Green Building Standards (CALGreen) Code. In addition, LEED Platinum certification would be obtained for certain media campus and general office development within the Project Site. While the Project is not anticipated to conflict with or obstruct a State or local plan for renewable energy or energy efficiency, further analysis of the Project's compliance with LADWP's plans for renewable energy, as well as the Project's compliance with California Building Energy Efficiency Standards, will be provided in the EIR.

[55] California Energy Commission, 2022 Building Energy Efficiency Standards, https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency, accessed February 8, 2023.

[56] California Energy Commission, 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, 2019.

VII. GEOLOGY AND SOILS

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:					
a.	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the state Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
	ii. Strong seismic ground shaking?	☐	☐	☒	☐
	iii. Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
	iv. Landslides?	☐	☐	☐	☒
b.	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
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 analysis contained in this section is based on an Evaluation and Summary of Geotechnical and Seismic Hazards prepared by Geosyntec Consultants (Geosyntec), dated February 2023, and included herein as Appendix IS-2.

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

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

Less than Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement within the last 1.6 million years.

The Project Site is located in a seismically active region, where active faults are present. Active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City of Los Angeles. There are several active faults in the Los Angeles metropolitan region that could affect on-site development. The most notable of these is the San Andreas Fault, which is located approximately 38 miles northwest of the Project Site, on the far side of the San Gabriel Mountains. Several other important active faults lie closer to and even within the populated area of greater Los Angeles. These include the Santa Monica, Hollywood, Verdugo, Elysian Park, Raymond, and Newport-Inglewood Faults.

CGS establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 feet to 500 feet on each side of a known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City of Los Angeles designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture. The Project Site is not located within an

Alquist-Priolo Fault Zone, and neither active nor potentially active faults cross the Project Site.[57] Additionally, the Project Site is not included in a City of Los Angeles Fault Rupture Study Area.[58] The closest known active fault is the Santa Monica Fault, located approximately 0.4 mile northwest of the Project Site. The Santa Monica Fault Zone is considered a part of a continuous zone comprised of multiple fault segments including the Malibu Coast, Santa Monica, Hollywood, Raymond, and Anacapa-Dume faults, in addition to several offshore fault zones including the Anacapa-Dume fault zone, the Santa Cruz Island fault zone, and the Santa Rosa Fault zone.

Blind thrust fault zones affecting the Project Site include the Elysian Park Thrust, with the closest edge of the vertical surface projections located approximately 11 miles southeast of the Project Site. Other nearby blind thrust fault zones include the Compton-Los Alamitos Thrust located approximately 10 miles south of the Project Site and the Puente Hills Blind Thrust located near downtown Los Angeles.

As discussed previously, no active or potentially active faults are known to underlay or extend toward the Project Site. Therefore, the fault rupture potential on-site is considered very low. The Project would be constructed to meet California Building Code (CBC) design standards to withstand seismic activity and its potential adverse effects. Project development would also be required to adhere to the seismic safety requirements contained in the Los Angeles Building Code (LAMC, Chapter IX, Article 1). The Los Angeles Building Code incorporates by reference the CBC, with City amendments for additional requirements. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be subject to standard LADBS review and permitting requirements. Thus, impacts to fault rupture would be less than significant, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

ii. Strong seismic ground shaking?

Less than Significant Impact. Southern California is a seismically active region. As noted above, the Inglewood and Santa Monica Fault Zones are located near the Project Site. Thus, the location of the Project Site within a seismically active area could expose people or structures to strong seismic ground shaking, similar to conditions present throughout southern California. Intensity of

[57] City of Los Angeles, Department of City Planning, Zone Info & Map Access System (ZIMAS), Parcel Profile Report for APN 4315019013 (10201 W. Pico Boulevard), APN 4315014004 (10267 W. Pico Boulevard), APN 4315014093 (10271 W. Pico Boulevard), and APN 4315014092 (10275 W. Pico Boulevard), June 23, 2023.

[58] City of Los Angeles, Department of City Planning, Zone Info & Map Access System (ZIMAS), Parcel Profile Report for APN 4315019013 (10201 W. Pico Boulevard), APN 4315014004 (10267 W. Pico Boulevard), APN 4315014093 (10271 W. Pico Boulevard), and APN 4315014092 (10275 W. Pico Boulevard), June 23, 2023.

ground shaking at a given location depends primarily upon earthquake magnitude, site distance from the source, and site response (soil type) characteristics.

The City adopted Ordinance No. 183,893 (Ordinance) on October 9, 2015 requiring seismic retrofit improvements for specific types of building construction (e.g., wood frame) and building age to minimize potential damage in the event of an earthquake. Adherence to the standards set forth in the Ordinance will improve the performance of these buildings during earthquakes.

The provisions of the Ordinance require that the owner of each building within the scope of the Ordinance conduct a structural analysis of the building by a civil or structural engineer or architect licensed by the State of California, and if the building does not meet the minimum earthquake standards specified in the Ordinance, the owner shall cause the building to be structurally altered to conform to such standards or, at the owner's option, cause it to be demolished within the time limits stated in the Ordinance. The Ordinance specifies that within 25 years, all necessary demolition or retrofit work on the building(s) must be completed.

A survey of the Project Site portion of the CCS Specific Plan was completed pursuant to the requirements set forth in the Ordinance, which determined that there are buildings within this portion of the Project Site that are subject to the Ordinance. As such, FOX would comply with the provisions set forth in the Ordinance. With compliance with the regulatory requirements set forth in Ordinance, those existing on-site buildings that are subject to the requirements of the Ordinance would be seismically retrofitted. As such, seismic-related impacts associated with these buildings would be reduced to levels deemed acceptable by the City. The buildings within the Pico Properties are in compliance with the Ordinance.

As mentioned above, the Project would be constructed to meet CBC and City of Los Angeles Building Code requirements to withstand strong seismic ground shaking and its adverse impacts. Thus, seismic impacts on the Project would be less than significant, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

iii. Seismic-related ground failure, including liquefaction?

No Impact. Liquefaction is the loss of soil strength or stiffness due to buildup of pore-water pressure during severe ground shaking. Liquefaction is associated primarily with loose (low-density), saturated, fine- to medium-grain, cohesionless soils.

The Beverly Hills Quadrangle of the State Earthquake Fault Zones map[59] does not identify the Project Site as within a seismic hazard zone for liquefaction. Additionally, the Project Site is not located in an area susceptible to liquefaction as mapped by the City.[60] Historic water level information indicates that groundwater levels at the Project Site are estimated to occur at a depth of approximately 30 to 40 feet below ground surface (bgs), with groundwater levels in the Project vicinity ranging between 25 feet to 45 feet bgs.[61] Based on a review of the regional geologic map, subsurface conditions reported in previous geotechnical investigations, and the absence of shallow groundwater, the Geotechnical Report (Appendix IS-2 to this Initial Study) concluded that the sediments underlying the Project Site are not prone to liquefaction. Furthermore, the Project would comply with applicable CBC and City of Los Angeles Building Code standards that address geotechnical hazards, including liquefaction. As such, no impacts related to ground failure, including liquefaction, would occur, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

iv. Landslides?

No Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site is characterized by a relatively flat topography with minimally sloping terrain. 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 City of Los Angeles, or within an area identified as having potential for slope instability.[62] Based on the Beverly Hills Quadrangle of the State Earthquake Fault Zones map, the Project Site is not located within an Earthquake-Induced Landslide Zone.[63] As such, the Project would not directly or indirectly cause potential substantial adverse effects involving landslides. No impacts would occur, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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59 State of California, Department of Conservation, Division of Mines and Geology, Earthquake Zones of Required Investigation, Beverly Hills Quadrangle, March 25, 1999.

60 City of Los Angeles, Department of City Planning, Zone Info & Map Access System (ZIMAS), Parcel Profile Report for APN 4315019013 (10201 W. Pico Boulevard), APN 4315014004 (10267 W. Pico Boulevard), APN 4315014093 (10271 W. Pico Boulevard), and APN 4315014092 (10275 W. Pico Boulevard), June 23, 2023.

61 Geosyntec Consultants, Evaluation and Summary of Geotechnical and Seismic Hazards, FOX FUTURE, page 7, February 2023, which is included as Appendix IS-2 to this Initial Study.

62 City of Los Angeles, Department of City Planning, Zone Info & Map Access System (ZIMAS), Parcel Profile Report for APN 4315019013 (10201 W. Pico Boulevard), APN 4315014004 (10267 W. Pico Boulevard), APN 4315014093 (10271 W. Pico Boulevard), and APN 4315014092 (10275 W. Pico Boulevard), June 23, 2023.

63 State of California, Department of Conservation, Division of Mines and Geology, Earthquake Zones of Required Investigation, Beverly Hills Quadrangle, March 25, 1999.

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

Less than Significant Impact. In general, the Project Site is highly developed, with little or no exposed soil that would be susceptible to erosion. Construction of the Project would require grading, excavation for below-grade parking structures, and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. This potential would be reduced through implementation of standard erosion controls imposed by the City of Los Angeles through grading and building permit regulations. Specifically, all grading activities would require grading permits from the Los Angeles Department of Building and Safety (LADBS) that include requirements and standards designed to limit potential impacts associated with erosion to acceptable levels. In addition, all on-site grading and site preparation would comply with the applicable provisions of Chapter IX, Division 70 of the Los Angeles Municipal Code (LAMC), which addresses grading, excavations, and fills. During operation of the Project, the potential for soil erosion to occur would be limited due to the generally level topography, the presence of on- and off-site drainage facilities, and the limited amount of pervious surfaces. Furthermore, the Project would be required to comply with the City's Low Impact Development (LID) Ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Accordingly, with compliance with applicable regulatory requirements, impacts regarding soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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

Less than Significant Impact. Southern California is a seismically active region, and the Project Site is located near the Santa Monica and Inglewood Faults. The Project would comply with applicable building codes and, as stated above in Sections 3.6.a.i and 3.6.b, applicable provisions of Chapter IX, Division 70 of the LAMC that address geotechnical hazards. As such, impacts related to unstable soils would be less than significant, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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

Less than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. As previously discussed, the Project Site is underlain by Pleistocene age sediments that are generally dense silty sand and firm silty clay silts. As detailed in Appendix IS-2 of this Initial Study, the presence of potentially expansive clayey soil was not observed in previous explorations performed within the vicinity of the Project Site. Given the underlying geologic conditions within the area, typically a sandy soil, expansive soils are not anticipated to be encountered within the Project Site. Construction of the Project would be required to comply with the CBC and with applicable provisions of Chapter IX, Division 70 of the LAMC, which include building foundation requirements appropriate to Project-site conditions. Moreover, in compliance with standard regulations, prior to the issuance of grading or building permits, the Applicant will be required to submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to LADBS for review and approval. The geotechnical report will assess potential consequences of any soil expansion and soil strength loss; provide an estimation of settlement, lateral movement, or reduction in foundation soil-bearing capacity; and discuss mitigation measures that may include building design consideration. Building design considerations would include but not be limited to ground stabilization; selection of appropriate foundation type and depths; selection of appropriate structural systems to accommodate anticipated displacements; or any combination of these measures. With compliance with these regulatory requirements, impacts related to expansive soils would be less than significant, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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

No Impact. The Project Site is located in a developed portion of the City of Los Angeles and is served by a wastewater collection, conveyance, and treatment system operated by the City of Los Angeles. No septic tanks or alternative disposal systems are proposed as part of the Project. Accordingly, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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

Less Than Significant Impact. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms since the majority of species that have existed on earth from this era are extinct. 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. Thus, surficial paleontological resources that may have existed at one time have likely been previously disturbed.

As discussed in Section 3, Project Description, of this Initial Study, the Project would require excavation associated with building foundations and below-grade parking levels. Specifically, excavation for the proposed Project would extend up to approximately 75 feet below existing grade within the Project Site portion of the CCS Specific Plan. Thus, it is possible that paleontological artifacts that were not recovered during prior construction or other human activity may be present. However, the City has established a standard condition of approval to address inadvertent discovery of paleontological resources. Should paleontological resources be inadvertently encountered, this condition of approval provides for the temporary halting of construction activities near the encounter so the find can be evaluated. A paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum and the Department of City Planning. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist. With implementation of the City's established condition of approval to address any inadvertent discovery of paleontological resources, Project impacts would be less than significant, and no mitigation measures are required.

Additionally, there are no distinct and prominent geologic or topographic features (i.e., hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands) on the Project Site or vicinity. Therefore, the Project would not destroy any distinct and prominent geologic or topographic features. No impact related to distinct and prominent geologic or

topographic features would occur, and no mitigation measures would be required. Therefore, no further analysis of this topic in the EIR is required.

VIII. GREENHOUSE GAS EMISSIONS

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

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

Potentially Significant Impact. Gases that trap heat in the atmosphere are called greenhouse gases (GHGs) since they have effects that are analogous to the way in which a greenhouse retains heat. GHGs are emitted by both natural processes and human activities. The accumulation of GHGs in the atmosphere affects 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 GHG 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 analysis of the Projects impacts on 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, which may conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs (e.g., Assembly Bill [AB] 32, SCAG's RTP/SCS, and the City of Los Angeles Green Building Code). Therefore, further analysis of the Project's relationship with applicable plans, policies or regulations adopted for the purpose of reducing the emissions of GHGs will be provided in the EIR.

IX. HAZARDS AND HAZARDOUS MATERIALS

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

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

Potentially Significant Impact. The Project's construction activities are anticipated to use typical, although potentially hazardous, construction materials, including vehicle fuels, paints, mastics, solvents, and other acidic or alkaline solutions that would require special handling, transport, and disposal. During operation, the Project's soundstage and support uses within SP Area B would continue to require the storage of fuels and the use of workshop materials, such as petroleum-based oils, grease, adhesives, glues, compressed gases, paints, solvents, acids, finish strippers, and cleaning products. Office uses, as well as the child care facility within the Pico Properties, would generally store and use property maintenance products, such as commercial cleaning and landscape materials. Although all potentially hazardous materials would be used and stored in compliance with applicable federal, State, and local regulations, the potential for the accidental release of hazardous materials exists.

With regard to exposure to existing on-site hazards, the Project includes the demolition of approximately 465,507 square feet of existing uses, some of which have the potential to contain hazardous asbestos-containing materials and/or lead-based paints. Grading and excavation also have the potential to increase exposure to soils containing hazardous materials from prior uses, or from existing on-site underground storage tanks. In addition, the Project Site is located in a Methane Zone as designated by the City[64] and the Cheviot Hill Oil Field. Therefore, further analysis of potential impacts to the public or the environment through the routine transport, use, or disposal of hazardous materials will be provided in the EIR.

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 mentioned above, the Project's construction activities are anticipated to use typical, although potentially hazardous, construction materials, including vehicle fuels, paints, mastics, solvents, and other acidic or alkaline solutions that would require special handling, transport, and disposal. During operation, the Project's soundstage and support uses within SP Area B would continue to require the storage of fuels and the use of workshop materials, such as petroleum-based oils, grease, adhesives, glues, compressed gases, paints,

[64] City of Los Angeles Department of City Planning, Zoning Information and Map Access System (ZIMAS), Parcel Profile Report for APN 4315019013 (10201 W. Pico Boulevard), APN 4315014004 (10267 W. Pico Boulevard), APN 4315014093 (10271 W. Pico Boulevard), and APN 4315014092 (10275 W. Pico Boulevard), June 23, 2023.

solvents, acids, finish strippers, and cleaning products. Office uses as well as the child care facility within the Pico Properties would generally store and use property maintenance products, such as commercial cleaning and landscape materials. In addition, the Project includes the demolition of existing buildings, some of which have the potential to contain hazardous asbestos-containing materials and/or lead-based paints. In addition, the Project Site is located in a City-designated methane zone.[65]

All potentially hazardous materials would be used and stored in compliance with applicable federal, State, and local regulations. Notwithstanding, further analysis of the potential for upset or accident conditions involving the release of hazardous materials into the environment will be provided in the EIR.

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. No existing or proposed public schools are within one-quarter mile of the Project Site. Two private schools, the Temple Isaiah Preschool and Kindergarten, located at 10345 Pico Boulevard and Le Lycee Francais, located at 10361 Pico Boulevard, are located within one-quarter mile of the Project Site. Therefore, further analysis of the impacts associated with the use and presence of hazardous materials will be provided 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?

No Impact. California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities, where there is known migration of hazardous waste. A significant impact may occur if a project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

The Project Site is not located on a hazardous materials site(s) list pursuant to Government Code Section 65962.5.[66] As such, no impacts would occur with regard to the Project Site being located

[65] City of Los Angeles Department of City Planning, Zoning Information and Map Access System (ZIMAS), Parcel Profile Report for APN 4315019013 (10201 W. Pico Boulevard), APN 4315014004 (10267 W. Pico Boulevard), APN 4315014093 (10271 W. Pico Boulevard), and APN 4315014092 (10275 W. Pico Boulevard), June 23, 2023.

[66] California Department of Toxic Substances Control, "EnviroStor," https://www.envirostor.dtsc.ca.gov/public/, Accessed February 8, 2023.

on a hazardous materials site(s) list pursuant to Government Code Section 65962.5, and no mitigation measures are required. Therefore, no further analysis of this topic is required 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 land use planning area.[67] The nearest airport is Santa Monica Airport located approximately 2.5 miles west of the Project Site. Given the distance between the Project Site and Santa Monica Airport, the Project would not have the potential to create or worsen environmental conditions that would result in a safety hazard or excessive noise. As such, no impact would occur, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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

Less than Significant Impact. The City of Los Angeles General Plan Safety Element addresses public protection from unreasonable risks associated with natural disasters (e.g., fires, floods, earthquakes). More specifically, the City's GeoHub system identifies emergency evacuation routes or disaster routes within the City. According to the GeoHub system, the nearest disaster routes within the Project area are Olympic Boulevard, adjacent to the Project Site's northern boundary, and Beverly Glen Boulevard, approximately 0.3 mile to the west.[68] While it is expected that the majority of Project construction activities would be confined to the Project Site, limited off-site construction activities may occur within adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access.

Operation of the Project would generate traffic in the Project vicinity and would result in modifications to Project Site access within the Project Site portion of the CCS Specific Plan,

[67] City of Los Angeles GeoHub, Airport Influence Areas, https://geohub.lacity.org/datasets/lacounty::airport-influence-area-1/explore?location=34.089515%2C-118.114950%2C9.80, accessed February 8, 2023.

[68] City of Los Angeles GeoHub, Disaster Routes, https://geohub.lacity.org/datasets/lacounty::disaster-routes-1/explore?location=34.260897%2C-118.302131%2C10.05, accessed February 8, 2023.

primarily in expanding the number of access points. Additionally, the Project would comply with LAFD access requirements and would not impede emergency access within the Project vicinity.

Accordingly, the Project would not cause an impediment along the City's designated disaster routes or impair implementation of the City's emergency response plan. Impacts related to the implementation of the City's emergency response plan would be less than significant, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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

No Impact. The Project Site is located in an urbanized area without any wildlands in the vicinity. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone.[69] Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety and would not create a fire hazard that has the potential to exacerbate wildfire risks. Accordingly, the Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death as a result of exposure to wildland fires. As such, no impact would occur, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

[69] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 4315019013 (10201 W. Pico Boulevard), APN 4315014004 (10267 W. Pico Boulevard), APN 4315014093 (10271 W. Pico Boulevard), and APN 4315014092 (10275 W. Pico Boulevard), June 23, 2023.

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 matter which would;				
i.	result in a 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 offsite;	☐	☐	☒	☐
iii.	create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv.	impede or redirect flood flows?	☐	☐	☐	☒
d.	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e.	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

The analysis contained in this section is based on the FOX FUTURE Hydrology and Water Quality Report (Hydrology Report) prepared for the Project by KPFF Consulting Engineers, dated August 2023, and included as Appendix IS-3 of this Initial Study.

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

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

Surface Water Quality

Construction

During Project construction, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. Therefore, Project related construction activities could potentially result in adverse effects on water quality. However, as Project construction would disturb more than one acre of soil, the Project would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (Order No. 2009-0009-DWQ, as well as its subsequent amendments 2010-0014-DWQ and 2012-0006-DWQ) pursuant to NPDES requirements. In accordance with the requirements of the NPDES Construction General Permit, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) adhering to the California Stormwater Quality Association Best Management MP Handbook. The SWPPP would set forth the Best Management Practices (BMPs) to be used during construction for stormwater and nonstormwater discharges could include sandbags, storm drain inlet protection, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction. The SWPPP would be carried out in compliance with State Water Resources Control Board requirements and would also be subject to review by the City for compliance with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities. During construction, the SWPPP would be referred to regularly and amended as changes occur throughout the construction process. In addition, Project construction activities would occur in

accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Prior to the issuance of a grading permit, the Applicant would be required to provide the City with evidence that a Notice of Intent has been filed with the State Water Resources Control Board to comply with the Construction General Permit. With compliance with these existing regulatory requirements that include specific BMPs to address surface water quality, impacts during construction would be less than significant.

Operation

Project operations, as is the case with most urban developments, has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, metals, and oil and grease. However, the Project would implement BMPs for managing stormwater runoff in accordance with the current City of Los Angeles Low Impact Development (LID) Ordinance requirements. The City's LID Ordinance sets the order of priority for selected BMPs, which is infiltration systems, stormwater capture and use, high efficiency biofiltration/bioretention systems, and any combination of these measures.

Any construction within the City that occurred prior to the City of Los Angeles implementing the Standard Urban Stormwater Mitigation Plans (SUSMPs) in 2002 would likely not include any stormwater treatment facilities. Any construction occurring between 2002 and the adoption of LID requirements in 2012 would conform with the SUSMP requirements in effect at the time of building construction. Any construction thereafter would conform to LID standards. Because some buildings on the Project Site predate the adoption of SUSMP and LID, it is assumed that there are areas within the Project Site where pollutants such as sediment, nutrients, pesticides, metals, pathogens, and oil and grease occur in the existing surface water runoff.

Under Section 3.1.3. of the City's LID Manual, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the 85th percentile storm event. With implementation of LID BMPs, operation of the Project would not result in discharges that would cause: (1) pollution which would alter the quality of the waters of the State to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the waters of the State by waste to a degree which creates a hazard to the public health through poisoning or through the spread of disease; or (3) a nuisance that would be injurious to health; affect an

entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes.

Furthermore, operation of the Project would not result in discharges that would cause regulatory standards to be violated. The existing Project Site is approximately 92% impervious. As Project development affects less than 50% of the Project Site, per the provisions of the City's LID requirements, stormwater BMPs specifically intended to control and treat stormwater runoff from areas of proposed development would be implemented in compliance with LID regulatory requirements. An existing drywell currently treating building 795 will be demolished as part of the Project. The demolition of this drywell would occur in accordance with all regulatory requirements. The LID BMPs that would be implemented under the Project would address at a minimum the first flush or the equivalent of the greater between the 85th percentile storm and first 0.75-inch of rainfall for any storm event. The installed BMP systems will be designed with an internal bypass or overflow system to prevent upstream flooding due to large storm events. The stormwater which bypasses the BMP systems is greater than the 85th percentile storm volume and has significantly less pollutants than the first flush. The stormwater after the first flush would discharge to an approved discharge point in the public right-of-way. As such, the Project would not interfere with the implementation of a water quality control plan and would not increase concentrations of the items listed as constituents of concern for the Ballona Creek Watershed, the local watershed within which the Project Site is located.

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

Ground Water Quality

Construction

Dewatering operations are practices that discharge non-stormwater, such as ground water, which must be removed from a given work location to proceed with construction. Discharges from dewatering operations can contain high levels of fine sediments, which if not properly treated, could lead to an exceedance of NPDES requirements. Development of the Project would include excavations to a maximum depth of 75 feet below ground surface. The City requires the use of the highest historical groundwater level for design and engineering purposes. The highest historical groundwater level at the Project Site is approximately 25 feet below the ground surface, and, as such, dewatering may be required during Project construction. If groundwater is

encountered during construction, temporary pumps and filtration would be utilized. The temporary system would comply with all applicable NPDES requirements related to construction and discharges from dewatering operations as well as the requirements set forth in the Los Angeles Regional Water Quality Control Board Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. With compliance with these regulatory requirements, groundwater quality impacts associated with potential dewatering activities would be less than significant.

The Project would also result in an export of up to approximately 669,127 cubic yards of existing soil material. While not anticipated, any contaminated soils found within the on-site excavations would be captured, removed from the Project Site, and remediated at an approved disposal facility in accordance with applicable regulatory requirements.

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes that may result could increase the potential for hazardous materials to be released into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste, such as the applicable provisions of the CCR Title 22, would reduce the potential for the construction of the Project to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. In addition, Project construction activities are not anticipated to affect existing wells, as there are no groundwater production wells or public water supply wells within one mile of the Project.

As previously discussed, the Project would be required to obtain coverage under the NPDES Construction General Permit. As part of the permit process, the Project would be required to prepare a SWPPP which sets forth BMPs to be used during construction for stormwater and non-stormwater discharges which could include sandbags, storm drain inlet protection, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction prior to its infiltration into groundwater.

Based on the above, construction of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements. Therefore, construction-related impacts on groundwater quality would be less than significant.

Operation

The Project does not include the installation or operation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well, or a spreading ground facility. However, the Project Site is located on the Cheviot Hills oil field and there are 22 abandoned oil wells on the Project Site. Based on available information, these oil wells are plugged and are not located on any of the areas within the Project Site proposed for development.

In general, operational activities which could affect groundwater quality include spills of hazardous materials and leaking underground storage tanks. Surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner, thereby resulting in little threat to groundwater. Other types of risks, such as leaking underground storage tanks, have a greater potential to affect groundwater. While such conditions could occur, no underground storage tanks are currently operated or will be operated within the disturbed areas of the Project site.

Source control measures per the City's LID requirements, including good housekeeping, removal of trash and maintenance of driveways and parking areas, and the proper use and storage of pesticides, would also reduce surface water quality impacts and would prevent pollutants from entering the groundwater by percolation within landscaped areas or other permeable surfaces. Any on-site use of hazardous materials associated with Project operations, such as small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, and pesticides for landscaping, as well as fuel storage associated with maintenance and/or emergency equipment, would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations such that no hazardous materials would be exposed to or otherwise adversely impact groundwater quality. The California Stormwater Quality Association provides suggested protocols including, but not limited to, "spot cleaning" leaks and drips routinely, labeling drains within the facility boundary, and reporting leaking vehicles to fleet maintenance. Therefore, the Project would not affect or expand any potential areas of contamination, increase the level of contamination, or cause regulatory

water quality standards at an existing production well to be violated, as set forth in the CCR, Title 22, Division 4, Chapter 15, and the Safe Drinking Water Act.

The Project is not anticipated to result in violations of any water quality standards or waste discharge requirements or otherwise substantially degrade groundwater quality. Additionally, the Project does not involve drilling to or through a clean or contaminated aquifer. Therefore, the Project's impact on groundwater quality would be less than significant.

Conclusion

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

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

Construction

No water supply wells are located at the Project Site or within one mile of the Project Site that could be impacted by construction, nor would the Project include the construction of water supply wells. As described above, development of the Project would include excavations up to a depth of 75 feet below the existing Project Site grade and the highest historical on-site groundwater level is at approximately 25 feet below the ground surface. As such, Project construction may require dewatering. Should dewatering be required, the quantity of water discharged to the storm drain system in accordance with all regulatory requirements is not anticipated to adversely impact groundwater supplies. Furthermore, the Project Site is over 92 percent impervious under existing conditions and as such no substantial groundwater recharge occurs. Lastly, with respect to groundwater quality, as discussed above, compliance with the requirements of the NPDES Construction General Permit and the requirements of LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties would reduce the potential for construction of the Project to release contaminants into groundwater. Therefore,

construction of the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management. As such, Project impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic is required in the EIR.

Operation

The Project would minimally increase the amount of impervious surface area on the Project Site from approximately 92.0 to 92.3 percent, resulting in a slight decrease in the amount of groundwater recharge occurring on-site. Notwithstanding, as discussed above, the Project would include the installation of structural BMPs as a means of pretreatment prior to infiltration of stormwater, which would allow for treatment of the on-site stormwater prior to potential contact with the groundwater below. Furthermore, the Project would not include the installation of water supply wells and there are no existing wells or spreading ground within one mile of the Project Site. Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management. As such, Project impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic is required in the 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 matter which would:

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

Less Than Significant Impact. Although no streams or rivers cross the Project Site, Project construction activities would include excavation to a maximum of 75 feet for subterranean parking levels, as well as grading for building structures, foundations, and hardscape and landscape around the structures. It is anticipated that grading activities yielding up to approximately 669,127 cubic yards of soil would be exported from the Project Site during Project construction. These activities have potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Also, exposed, and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as discussed above, the Project would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage

runoff flows and prevent pollution. The NPDES and SWPPP measures would contain and treat, as necessary, stormwater or construction watering on the Project Site so runoff does not impact off-site drainage facilities or receiving waters.

In addition, the Project would be required to comply with all applicable City grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP, implementation of BMPs, and compliance with applicable City grading regulations, the Project would not substantially alter the Project Site's drainage patterns in a manner that would result in substantial erosion, siltation, flooding on- or off-site. Similarly, adherence to standard compliance measures in construction activities would not cause flooding, substantially increase or decrease the amount of surface water flow from the Project Site into a water body, or result in a permanent, adverse change to the movement of surface water. As such, Project impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic is required in the EIR.

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

Less Than Significant Impact. Existing impervious surfaces include buildings and impervious pavements for pedestrian and vehicular circulation and existing pervious surfaces include landscaped areas. Development of the Project would include development of new buildings, paved areas, and landscaped areas, resulting in a minimal increase in impervious surface area from approximately 92.0 to 92.3 percent. This minimal increase in impervious surface area along with new on-site infrastructure, would result in forecasted stormwater flows to be similar to existing conditions. In addition, the Project's stormwater infrastructure would be designed to convey the 50-year storm to the desired discharge location and inlets within the Project Site would be sized to address ponding. Further, the LID regulatory measures for the Project would outline the stormwater treatment post-construction BMPs required to control pollutants associated with storm events up to the 85th percentile storm event and the Project's proposed BMPs would address both stormwater runoff quality and quantity. Additionally, with regard to flooding potential, the Project Site is located within Zone X identified by the Federal Emergency Management Agency (FEMA) and published in the Flood Insurance Rate Maps (FIRM). Zone X is defined as areas of minimal flood hazard.[70] With the Project's regulatory required BMPs in place, the Project would

[70] FIRMs depict the 100-year floodplain as Zone A, Zone AO, Zone AH, Zones A1-A30, Zone AE, Zone A99, Zone AR, Zone AR/AE, Zone AR/AO, Zone AR/A1-A30, Zone AR/A, Zone V, Zone VE, and Zones V1-V30. FIRMs depict the 500-year floodplain as Zone B or Zone X (shaded).

not substantially increase the rate or amount of surface runoff in a manner which would result in flooding. As such, Project impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic is required in the 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;

Less Than Significant Impact. Refer to Response to Checklist Questions X.a and X.c.ii, above. As discussed in Response to Checklist Question X.a, implementation of BMP systems proposed as part of the Project would result in a substantial improvement in surface water quality runoff from the Project Site. In addition, as discussed in Response to Checklist Question X.c.ii, the Project would result in a minimal increase in impervious surface area and stormwater flows are forecasted to be similar to existing conditions. Therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. As such, Project impacts would be less than significant, and no mitigation measures are required. No further analysis of this topic is required in the 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 of Los Angeles.[71,72] Thus, the Project would not impede or redirect flood flows. As such, no impacts would occur, and no mitigation measures are required. No further analysis of this topic is required in the EIR.

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

No Impact. As discussed above, the Project Site is not located within a 100-year flood hazard area as mapped by FEMA or by the City of Los Angeles. The Project Site is also not located within inundation zone associated with the Encino Reservoir/Hansen Dam.[73] In addition, the City's 2018

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[71] FIRMs depict the 100-year floodplain as Zone A, Zone AO, Zone AH, Zones A1-A30, Zone AE, Zone A99, Zone AR, Zone AR/AE, Zone AR/AO, Zone AR/A1-A30, Zone AR/A, Zone V, Zone VE, and Zones V1-V30. FIRMs depict the 500-year floodplain as Zone B or Zone X (shaded).

[72] City of Los Angeles 2018 Local Hazard Mitigation Plan, January 2018, West Los Angeles APC, FEMA DFIRM Flood Hazard Areas, p. 10-37.

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

Local Hazard Mitigation Plan does not map the Project Site as being located within a tsunami hazard area.[74] Therefore, no tsunami or tsunami events would be expected to impact the Project Site. Additionally, there are no standing bodies of water near the Project Site that may experience a seiche. In addition, as discussed above, the Project would include new structural BMPs throughout the Project Site which would reduce the amount of pollutants entering the stormwater system and groundwater. Thus, the Project would not release pollutants due to the Project Site being inundated related to a flood hazard, tsunami, or seiche. As such, no impacts would occur, and no mitigation measures are required. No further analysis of this topic is required in the EIR.

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 Los Angeles Regional Water Quality Control Board (LARWQCB) prepares a list of impaired waterbodies in the region, referred to as the 303(d) list. The 303(d) list outlines impaired waterbodies and the specific pollutant(s) for which it is impaired. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL).

The Project Site lies within the Ballona Creek Watershed. Constituents of concern listed for Ballona Creek under California's Clean Water Act Section 303(d) List include cadmium (sediment), chlordane (tissue and sediment), coliform bacteria, copper (dissolved), cyanide, DDT, lead, polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), selenium, sediment toxicity, Shellfish Harvesting Advisory, silver, toxicity, trash, viruses (Enteric), and zinc. TMDLs that apply to this waterbody include PCBs, DDT (Dichlorodiphenyltrichloroethane), Cadmium, Zinc, Chlordane, Indicator Bacteria, PAHs, Copper, Toxicity, Lead, Silver, Trash, and Enteric.

As discussed above, during construction the Project would be required to implement a Local SWPPP that would set forth BMPs for stormwater and non-stormwater discharges which could include sandbags, storm drain inlets protection, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction. The SWPPP would be carried out in compliance with State Water Resources Control Board requirements and would also be subject to review by the City. During construction, the SWPPP would be referred

[74] City of Los Angeles 2018 Local Hazard Mitigation Plan, January 2018, West Los Angeles APC, Tsunami Inundation Zones, p. 12-5.

to regularly and amended as changes occur throughout the construction process. In addition, Project construction activities would occur in accordance with City grading permit regulations, such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. In addition, the implementation of BMPs required by the City's LID Ordinance during Project operation would target pollutants that could potentially be carried in stormwater runoff. As such, construction and operation of the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans.

With regard to potential impacts associated with groundwater management, as discussed above in Response to Checklist Question X.a., of this Initial Study, the Project would not expand any potential areas of contamination, increase the level of groundwater contamination, or cause regulatory water quality standard violations to be exceeded, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15, and the Safe Drinking Water Act. In addition, the Project is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation.

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

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?

No Impact. A significant impact may occur if a project is sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (e.g., a project involving a continuous right-of-way such as a roadway that divides a community and impedes access between parts of the community). As previously discussed, the Project Site is currently developed and is located in an urbanized area comprising a diverse mix of land uses. In general, the major arterials adjacent to the Project Site, including Olympic Boulevard, Avenue of the Stars, and Pico Boulevard are lined with commercial, residential, recreational, and institutional uses. Land uses immediately surrounding the Project Site include a hotel, office building, and residential development. Specifically, north of the Project Site and south of Galaxy Way is a 16-story hotel. North and west of Galaxy Way are the 35-story 2121 Avenue of the Stars building and 6-level parking structure. North of Olympic Boulevard is the 42-story The Century residential building, with the gated Century Woods residential development located to the west of The Century.

On the east side of Avenue of the Stars, across from the Project Site, are low-rise (2 and 3 stories in height), condominiums and townhomes in gated communities with the two 28-story residential buildings of the Century Towers located at the northeastern corner of Avenue of the Stars and Pico Boulevard. South of Pico Boulevard, across from the Project Site, is the Cheviot Hills Recreation Center and Rancho Park Golf Course, with the Hillcrest Country Club and golf course located southeast of the Project Site. West of the Project Site is a residential neighborhood that consists of single-family homes and low-rise 3- to 4-story multifamily residential buildings located

along a few of the north-south streets, including the east side of Fox Hills Drive directly abutting the western boundary of SP Area B and north of the Pico Properties.

The Project would redevelop the Project Site with new studio-related and general office uses, as well as parking facilities and circulation improvements, landscaping, and open space. These uses would be consistent with the existing on-site uses and uses located in proximity to the Project Site (e.g., 2121 Avenue of the Stars building). All proposed development would occur within the boundaries of the Project Site and would not physically divide an established community. As such, no impacts related to the physical division of an established community would occur, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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 would require several discretionary approvals, including adoption of the following: (1) General Plan Amendment to the West Los Angeles Community Plan, (2) amendment to the Century City South Specific Plan, (2) Zone Change to reflect the proposed amendment to the Century City South Specific Plan and [Q] conditions, (3) Main Conditional Use Permit for the on-site sale and consumption of alcoholic beverages, (4) Development Agreement, (5) Parcel Map, (6) haul route approval, and (7) other discretionary and ministerial permits deemed necessary to implement the Project. Therefore, further analysis of the Project's consistency with applicable land use plans, policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect will be provided in the EIR.

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. In 1975, the California State Legislature enacted the Surface Mining and Reclamation Act (SMARA) that resulted in the State geologist classifying areas within the State based on mineral resource availability. No mineral extraction operations currently occur on the Project Site. The Project Site is located within the MRZ-3 zone, which indicates that the Project Site is an area of undetermined mineral resource significance.[75] The Project Site is not located within an MRZ-2 Area pursuant to the *Conservation Element* of the City's General Plan.[76] The Project Site is located along the edge of the Beverly Hills Oil Field and the Cheviot Hills Oil Field. There are several plugged and abandoned oil wells within the Project Site portion of the CCS Specific Plan.[77] Project implementation would not occur in the areas within the Project Site portion of the CCS Specific Plan where the plugged and abandoned oil wells are located and would not result in the loss of availability of a known mineral resource of value to the region and residents of the State or a locally important mineral resource recovery site. As such, no impacts would occur, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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[75] California Department of Conservation, Special Report 254, Plate 1, Updated Mineral Resource Zones for Portland Cement Concrete Aggregate in the San Fernando Valley and Saugus-Newhall Production-Consumption Regions, 2021.

[76] City of Los Angeles Planning Department, Conservation Element of the City of Los Angeles General Plan, (Adopted September 26, 2001), Exhibit A, Mineral Resources.

[77] State of California, Department of Conservation, Division of Oil, Gas, and Geothermal Resources, Well Search, 2023.

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?

Less than Significant Impact. As indicated above, the Project Site is located along the edge of the Cheviot Hills Oils Field and near the Beverly Hills Oil Field. There are several plugged and abandoned oil wells within the Project Site portion of the CCS Specific Plan.[78] Development within the Project Site would not occur in the areas within the Project Site portion of the CCS Specific Plan where the plugged and abandoned oil wells are located and would not impact the availability to extract oil from both oil fields. As such, impacts would be less than significant, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

[78] State of California, Department of Conservation, Division of Oil, Gas, and Geothermal Resources, Well Search, 2023.

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. Construction of the Project would utilize heavy equipment for demolition, site clearing, excavation, foundation preparation, building construction and utility connections. During each construction phase, there would be a different mix of equipment operating, and noise levels would vary based on the amount of equipment in operation and the location. Though increases in noise levels during construction would be temporary and intermittent in nature, construction-related noise may potentially exceed the City's threshold. Furthermore, the majority of Project construction would occur internal to the Project Site portion of the CCS Specific Plan, and, thus, construction noise levels at off-site locations would vary depending on the location of on-site construction in relation to off-site noise-sensitive uses.

The Project Site is located within an urbanized area that contains various sources of noise. The most predominant source of noise in the Project area is associated with traffic from roadways. Existing on-site noise sources within the Project Site portion of the CCS Specific Plan include studio-related noise, special events, building equipment (i.e., mechanical equipment), trucks and equipment (i.e., safety warning alarm), human activity, and parking lot activity. The Project would increase the various types of uses that occur on the Project Site, as well as motor vehicle travel at off-site locations, which may potentially increase noise levels during Project operation when compared to existing operational noise levels. Therefore, further analysis of the Project's noise impacts will be provided in the EIR.

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

Potentially Significant Impact. Vibration is sound radiated through the ground. Vibration can result from a source (e.g., vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration.

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. During operation of the Project, ground-borne vibration may also emanate from roadway motor vehicle travel attributable to the Project, vehicles within parking structures, and/or other on-site activities. As such, Project construction activities and operation could have an adverse impact on both sensitive structures (e.g., building damage) and populations (e.g., human annoyance). Therefore, further analysis of the Project's vibration impacts 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. The closest private airstrip or airport is Santa Monica Airport, which is approximately 2.5 miles west of the Project Site. In addition, the Project Site is not located within two miles of an airport or within an area subject to an airport land use plan. Given the distance between the Project Site and the

closest private airstrip and public airport, the Project would not have the potential to expose people that reside or work in the Project area to excessive noise levels from these sources of noise. As such, no impacts would occur, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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 population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b.	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

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

Less than Significant Impact. A significant impact may occur if a project induces substantial unplanned population growth in an area, either directly or indirectly. As discussed in Section 3, Project Description, of this Initial Study, the Project does not include housing and, thus, would not directly introduce a new residential population that would contribute to population growth in the vicinity of the Project Site or within the West Los Angeles Community Plan area.

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

Project employees were forecasted using employee generation factors from LADOT for the Project's general office uses within SP Area A and the Pico Properties[79] and FOX on-site operations for all studio-related uses within SP Area B. The employment forecast for the child care facility within the Pico Properties is based on the size of the facility. **Table XIV-1**, *Estimated Project Employment*, provides the forecast of the number of Project employees that would be working at the Project Site during Project operations. As shown in **Table XIV-1**, employment projections are provided based on average daily, as well as peak daily, conditions. The average day employment forecast reflects employment levels over the course of a year-long cycle, while the peak day employment forecast reflects employment levels during peak production periods within SP Area B. As such, the peak employment forecast only addresses increases in employment generated by studio-related uses within SP Area B, whereas general office uses and the child care facility do not exhibit this same pattern in terms of daily employment levels over the course of a year. Based on on-site conditions, daily peak employment levels for studio-related uses within SP Area B are forecasted to be 15 percent higher than the forecast of daily average studio-related employment.

[79] Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3 Updated, May, 2020.

Table XIV-1
Estimated Project Employment

	Building Area	Daily Average Conditions		Daily Peak Conditions	
		Employment Factor (square feet per employee)	Number of Employees	Employment Factor at Peak	Number of Employees
CCS Specific Plan					
New Construction and Adaptive Reuse					
Media Campus Office	214,746	270	795	15%	914
Specialty Space	308,651	400	772	15%	888
Stage Space	223,241	535	417	15%	480
Facility Support	332,791	1,700	196	15%	225
Utility Support	47,669	5,000	10	15%	12
General Office	965,250	250	3,861	0%	3,861
Total New Floor Area	**2,092,348**		**6,051**		**6,380**
Demolition					
Media Campus Office	-231,087	270	-856	15%	-984
Specialty Space	-117,679	400	-294	15%	-338
Stage Space	-79,842	535	-149	15%	-171
Facility Support	-30,599	1,700	-18	15%	-21
Utility Support	-1,791	5,000	0	15%	0
Total Demolition	**-460,998**		**-1,317**		**-1,514**
Net New Floor Area	**1,631,350**		**4,734**		**4,866**
Pico Properties					
Reuse of Floor Area					
Child Care	6,607	[1]	12	0%	12
General Office	2,628	250	11	0%	11
Total Reuse of Floor Area	9,235		23		23
Demolition					
Total Demolition	-4,509	400	-11	15%	-13
Floor Area to Remain	**9,235**		**12**		**10**
Project Total					
Net Project Floor Area	**1,640,585**		**4,746**		**4,876**

[1] *Forecast of child care employment is based on the size of the facility.*

Source: Kosmont Companies, Fox Future Project: Employment Analysis Technical Memorandum, 2023 (refer to Appendix IS-4 of this Initial Study).

During daily average conditions, the Project is estimated to generate a total of 6,074 employees associated with total new Project floor area.[80,81] Considering the Project's demolition of floor area, this total would be reduced by 1,328 employees[82], resulting in a net increase of 4,746 employees. Total on-site population, which includes Project employees, as well as visitors and vendors to the Project Site, as shown in **Table XIV-2**, *Estimated Population*, is estimated to result in a net increase of 6,572 individuals on the Project Site on a daily basis under average conditions.

Table XIV-2
Estimated Employment

Net New Development	Daily Average Conditions	Daily Peak Conditions
On-Site Employment	4,746	4,876
Visitors	1,696	2,393
Vendors	130	273
Total Daytime Population	**6,572**	**7,542**
Source: Kosmont Companies, Fox Future Project: Employment Analysis Technical Memorandum, 2022 (refer to Appendix IS-4 of this Initial Study).		

The Project during daily peak conditions, as shown in **Table XIV-1**, is estimated to generate a total of 6,403 employees associated with total new Project floor area.[83] Considering the Project's demolition of floor area, this total would be reduced by 1,527 employees[84], resulting in a net increase of 4,876 employees. Total on-site population under daily peak conditions is estimated to result in a net increase of 7,542 individuals on the Project Site on a daily basis.

Compared against employment data from SCAG's 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), an estimated 2,135,900 employees are projected within the City of Los Angeles in 2045, the forecast year closest to the Project's buildout

80 Employment totals include employment forecasted to occur within the Pico Properties as the buildings located at 10271 and 10275 Pico Boulevard are currently vacant and the existing building at 10267 Pico Boulevard would be demolished and not replaced as part of Project development.

81 Based on a total of 6,051 and 23 employees associated with development within the Project Site portion of the CCS Specific Plan and the Pico Properties, respectively.

82 Based on a total of 1,317 and 11 employees associated with development within the Project Site portion of the CCS Specific Plan and the Pico Properties, respectively.

83 Based on a total of 6,380 and 23 employees associated with development within the Project Site portion of the CCS Specific Plan and the Pico Properties, respectively.

84 Based on a total of 1,514 and 13 employees associated with development within the Project Site portion of the CCS Specific Plan and the Pico Properties, respectively.

year, with a growth of 228,098 new employees projected in the City between 2022 and 2045. The Project's net increase in average annual employment would represent 0.22 percent of the total number of employees in the City in 2045 and 2.08 percent of the growth between 2022 and 2045.

While some new Project employees may be anticipated to relocate to the Project vicinity, many would not or be expected to move as a result of redevelopment of the Project Site. Accordingly, this potential indirect increase in population would not be substantial. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project Site, and other employees would be expected to commute to the Project Site from other communities both in and outside of the City, as occurs under existing conditions. Therefore, given that the Project would not directly contribute to substantial population growth in the Project area through the development of residential uses and since many of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site or who would commute to the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Further, as the Project would be located in an urbanized area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth.

Based on the above, the Project would not induce substantial population growth either directly or indirectly. As such, impacts would be less than significant, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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

No Impact. A significant impact may occur if a project would result in the displacement of a substantial number of existing housing units or residents, necessitating construction of replacement housing elsewhere. As no housing currently exists on the Project Site, the Project would not cause the displacement of any persons, housing, or require the construction of housing elsewhere. As such, no impacts related to displacement of people or housing would occur, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

XV. PUBLIC SERVICES

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:					
a.	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:				
	i. Fire protection?	☒	☐	☐	☐
	ii. Police protection?	☒	☐	☐	☐
	iii. Schools?	☐	☐	☒	☐
	iv. Parks?	☐	☐	☒	☐
	v. Other public facilities?	☐	☐	☒	☐

a. 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:

i. Fire protection?

Potentially Significant Impact. The LAFD provides fire protection and emergency medical services to the Project Site and surrounding area. The Project would increase the floor area and associated occupancy on-site, which could result in the need for additional fire protection services during Project operation. Additionally, construction sites could also result in conditions that require a LAFD response. Therefore, further analysis of potential impacts to determine if the Project would require new or physically altered LAFD facilities resulting in adverse physical impacts will be provided in the EIR.

ii. Police protection?

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

iii. Schools?

Less than Significant Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD), which is divided into six local districts. The Project Site is located in Local District (LD) West and is served by Westwood Charter Elementary School, Ralph Waldo Emerson Community Charter Middle School, Daniel Webster Middle School, and University High School.[85,86] As previously discussed, the Project does not include residential uses. Accordingly, Project implementation would not result in a direct increase in the number of students within the LAUSD service area due to the introduction of a residential population. In addition, while some new Project employees may be anticipated to relocate to the Project vicinity, as with existing employees, many would not or be expected to move as a result of redevelopment of the Project Site. Thus, an associated demand for new or expanded school facilities would not be expected. Furthermore, per SB 50, the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered full mitigation of Project-related school impacts. As such, impacts related to service ratios or other performance objectives for schools would be less than significant, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

iv. Parks?

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 and the City of Beverly Hills Recreation and Parks Division. Nearby public parks and recreational

[85] Los Angeles Unified School District, Local District—West Map, July 11, 2022.

[86] Los Angeles Unified School District, School Finder, https://explorelausd.schoolmint.net/school-finder/home, accessed February 9, 2023.

facilities are shown in **Table XV-1**, *Existing Public Parks and Recreational Facilities within a 1.5-Mile Radius of the Project Site*, below.

Table XV-1
Existing Public Parks and Recreational Facilities within a 1.5-Mile Radius of the Project Site

Facility	Address	Distance	Type of Facility
City of Los Angeles			
Rancho Park Golf Course	10460 Pico Boulevard	0.1 miles south	Golf Course
Cheviot Hills Recreation Center	2551 Motor Avenue	0.25 miles to the south	Recreation Center
Cheviot Hills Tennis Center	2551 Motor Avenue	0.25 miles to the south	Tennis Center
Cheviot Hills Pool	2693Motor Avenue	0.5 miles to the south	Aquatic Center
Irving Schachter Park	2599 Beverwill Drive	1 mile to the south	Neighborhood Park
Palms Recreation Center	2950 Overland Avenue	1.2 miles to the south	Community Park
Woodbine Park	3409 Vinton Avenue	1.5 miles to the south	Neighborhood Park
Robertson Recreation Center	1641 Preuss Road	1.4 miles to the east	Recreation Center
City of Beverly Hills			
Roxbury Park & Community Center	417 S Roxbury Drive	0.25 miles to the east	Community Park

As previously discussed, the Project would not include residential uses and would not generate a new residential population that would regularly utilize nearby parks and recreational facilities. In addition, while some new Project employees may be anticipated to relocate to the Project vicinity, as with existing employees, many would not or be expected to move as a result of redevelopment of the Project Site. Thus, an associated demand for new or expanded park facilities would not be expected. While it is possible that some of the 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. Moreover, Project employees would be more likely to use parks near their homes during non-work hours.

Furthermore, the Project proposes on-site open space areas and may include fitness amenities for Project employees, thus reducing the likelihood that employees would use local parks. As such, impacts related to park services would be less than significant, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

v. Other public facilities?

Less than Significant Impact. Other public facilities available include libraries. The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles through its Central Library, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through Web-based resources.[87] Two public libraries are located in the Project area—the Palms-Rancho Park Branch Library at 2920 Overland Avenue and the Westwood branch library at 1246 Glendon Avenue.

As previously discussed, the Project would not include residential uses and would not generate a new residential population that would utilize local libraries. In addition, while some new Project employees may be anticipated to relocate to the Project vicinity, as with existing employees, many would not or be expected to move as a result of redevelopment of the Project Site. Thus, an associated demand for new or expanded library facilities would not be expected. While it is possible that some of the employees may utilize local libraries, such use would be anticipated to be limited due to the availability of easily accessible on-site and web-based resources. As such, impacts related to libraries would be less than significant, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

[87] Los Angeles Public Library, Los Angeles Public Library Strategic Plan 2015–2020, no date.

XVI. RECREATION

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:					
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 Significant Impact. As discussed above in Response to Checklist Question XV.d., the Project would not generate a new residential population that would regularly utilize nearby parks and recreational facilities, and any use of local parks and recreational facilities is anticipated to be limited. The new employment opportunities generated by the Project may be filled, at least in part, by employees residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Accordingly, only a fraction of new Project employees would be expected to create new demand for local parks and recreational facilities, and such use is anticipated to be limited due to work obligations and the travel time necessary to access off-site parks and recreational facilities. In addition, Project employees are often more likely to use parks and facilities near their homes during non-work hours. Furthermore, the Project proposes on-site open space areas and may include fitness amenities for Project employees, thus reducing the likelihood that employees would use local parks and recreational facilities. As such, impacts related to parks and recreational facilities would be less than significant, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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

No Impact. As discussed above in Response to Checklist Question XV.d., the Project would not generate a new residential population that would regularly utilize nearby public parks and recreational facilities and would not require construction or expansion of public recreational facilities. In addition, the Project would not include recreational facilities available to the public. Therefore, no impact with respect to the construction or expansion of recreational facilities would occur, and no mitigation measures are required. Any impacts related to the potential development of fitness amenities for Project employees would be evaluated as part of overall Project impacts. Therefore, no further analysis of this topic is required in the EIR.

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. Construction of the Project has the potential to affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site.

During operation, the Project would generate vehicle, bicycle, pedestrian and transit trips, resulting in an increase in the use of the Project area's transportation facilities. As such, the Project could potentially conflict with an applicable plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, further analysis of potential transportation impacts will be provided in the EIR.

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

Potentially Significant Impact. SB 743, which went into effect in January 2014, 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 regarding the reduction of GHG emissions, creation of a multi-modal transportation network, and promotion of mixed-use developments. CEQA Guidelines Section 15064.3 states that vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts, replacing LOS.

In August 2022, LADOT issued their updated Transportation Assessment Guidelines (TAG), which sets forth revised thresholds of significance for evaluating transportation impacts, as well as screening and evaluation criteria for determining impacts. The TAG also establish VMT as the City's formal method of evaluating a project's transportation impacts and set forth the methodology for analyzing a project's transportation impacts in accordance with SB 743.

Project development and the associated increase in employment would increase VMT over existing conditions. Therefore, further analysis of potential VMT impacts 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 Site is located in an urbanized area developed with numerous roadways and infrastructure. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. In addition, the Project would not include any new public roads that would result in an increase in hazards due to a design feature.

As previously discussed, the Project would make use of the existing driveways and pedestrian entrances located around the Project Site perimeter, as well as modifications to existing Gate 3 along Avenue of the Stars and a new Gate 5 along Olympic Boulevard. Enhanced pedestrian and bicycle access would also be incorporated into existing, as well as the modified and new, gates that provide access to the Project Site. These improvements to Project Site access would improve accessibility, walkability, and vehicular circulation in and around the Project Site. The proposed

driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding Project Site access. All access points to ensure a secured perimeter would be controlled with gates and/or staffed guard houses.

In addition, the Project would provide integrated mobility facilities throughout the Project Site and would implement pedestrian path, crosswalk, and signage improvements at both the new and modified entrances to improve safety and enhance multi-modal First/Last Mile connectivity to the Central Mobility Hub located at the Metro D Line Century City/Constellation Station. The on-site integrated mobility facilities could include, but not be limited to, shared-bicycle facilities, bicycle parking access, carpool/vanpool parking, and dynamic informational bulletin boards, and would provide multi-modal options and First/Last Mile connection support for employees and visitors to the Project Site. The on-site integrated mobility facilities would also provide convenient pedestrian access routes between the interior areas of the Project Site and the pedestrian gates, as well as enhance the connections to the Central Mobility Hub and the adjacent exterior multi-modal and/or transit facilities located in proximity to the perimeter of the Project Site.

The City's Vision Zero: Eliminating Traffic Deaths in Los Angeles by 2025 (Vision Zero) is a traffic safety policy that promotes strategies to eliminate collisions that result in severe injury or death. Vision Zero has identified the High Injury Network (HIN), a network of streets based on collision data from the last five years, where strategic investments will have the biggest impact in reducing death and severe injury. Within the Project Site vicinity, Santa Monica Boulevard west of Beverly Glen Boulevard and Pico Boulevard east of Roxbury Drive have been identified in the HIN.

Vision Zero promotes projects and improvements designed to increase safety on City streets. The Project improvements to the pedestrian and vehicular environment would prioritize safety and access for all individuals and thus would not preclude future Vision Zero safety improvements by the City. Thus, the Project would not conflict with Vision Zero or exacerbate safety issues associated with the HIN.

Similarly, Mobility Plan 2035: An Element of the General Plan (Mobility Plan) identifies key corridors as components of various "mobility-enhanced networks." Each network is intended to focus on improving a particular aspect of urban mobility, such as transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. The following summarizes the location of each network in proximity to the Project Site:

- Transit Enhanced Network (TEN): Santa Monica Boulevard and Pico Boulevard are designated as part of the City's TEN.

- City's Pedestrian Enhanced District (PED): The following streets are part of the City's PED: (1) Santa Monica Boulevard, (2) Constellation Boulevard, (3) Olympic Boulevard west of Benecia Avenue and between Bellwood Avenue and Heath Avenue, (4) Pico Boulevard east of Peerless Place, (5) Beverly Glen Boulevard north of La Grange Avenue and south of Louisiana Avenue, (6) Century Park West, (7) Avenue of the Stars, and (8) Century Park East north of Galaxy Way.

- City's Bicycle Lane Network (BLN): The following streets are part of the City's BLN: (1) Santa Monica Boulevard west of Century Park East, (2) Pico Boulevard, (3) Beverly Glen Boulevard north of Santa Monica Boulevard, (4) Avenue of the Stars, (5) Motor Avenue, and (6) Roxbury Drive between Beverly Green Drive and Cashio Street.

- City's Neighborhood Enhanced Network (NEN): The following streets are part of the City's NEN: (1) Missouri Avenue west of Holmby Avenue, (2) La Grange Avenue west of Prosser Avenue, (3) Tennessee Avenue, (4) Prosser Avenue, and (5) Club View Drive.

The Project's access and circulation improvements and proposed integrated mobility facilities would complement these designations and future facilities planned in the area by the City.

In addition, the Project would not introduce any incompatible uses as the proposed uses are consistent with the types of uses already present on-site and uses located in proximity to the Project Site (e.g., 2121 Avenue of the Stars building). Therefore, no further analysis of this topic is required in the EIR.

d. Would the Project result in inadequate emergency access?

Less than Significant Impact. According to the City's GeoHub system, the nearest disaster routes within the Project area are Olympic Boulevard, adjacent to the Project Site's northern property line, and Beverly Glen Boulevard, approximately 0.3 mile to the west.[88] While it is expected that the majority of Project construction activities would be confined on-site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project does not propose the closure of any local public streets, and primary access to the Project Site would continue to be provided from

[88] City of Los Angeles GeoHub, Disaster Routes, https://geohub.lacity.org/datasets/lacounty::disaster-routes-1/explore?location=34.260897%2C-118.302131%2C10.05, accessed February 9, 2023.

the adjacent roadways. In addition, the Project would comply with LAFD access requirements, including required fire lane widths, turning radii, secondary access, etc., and plot plans would be submitted to LAFD for approval. Accordingly, the Project would not result in inadequate emergency access to the Project Site or surrounding uses. As such, impacts regarding emergency access would be less than significant, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

XVIII. TRIBAL CULTURAL RESOURCES

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
a.	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☒	☐	☐	☐
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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 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 § 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 § 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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public

Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

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

As noted above, the Project would require excavations of up to approximately 75 feet within the Project Site portion of the CCS Specific Plan, which could have the potential to disturb existing but undiscovered tribal cultural resources. Accordingly, 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. In compliance with AB 52, the City will notify all applicable tribes, and the City will participate in any requested consultations for the Project. Therefore, further analysis of potential impacts to tribal cultural resources 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 waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☒	☐	☐	☐
d.	Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e.	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

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

Potentially Significant Impact. Water, wastewater, and electric power 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, and electricity demand and wastewater generation, further analysis of potential impacts to these utilities will be provided in the EIR.

Regarding stormwater drainage, refer to Response to Checklist Question X.c(iii).

With respect to telecommunications facilities, the Project would require construction of new on-site telecommunications infrastructure to serve new buildings and potential upgrades and/or relocation of existing telecommunications infrastructure. Therefore, further analysis of these improvements will be provided in the EIR as part of overall Project impacts.

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 analysis of potential impacts to water supply 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. Wastewater treatment is provided by the City of Los Angeles Bureau of Sanitation. Given the Project's increase in floor area and the associated employee population, the Project would increase wastewater generated from the Project Site. Therefore, further analysis of potential impacts related to wastewater conveyance and treatment 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. The Bureau of Sanitation generally provides solid waste collection services to single-family and some small multi-family developments, and private haulers permitted by the City provide solid waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills

within the County are categorized as either Class III or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, are disposed of in inert waste landfills.[89]

Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the Countywide Integrated Waste Management Plan (CoIWMP) Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.[90] Based on the 2020 CoIWMP Annual Report, the most recent report available, the total amount of solid waste disposed of at in-county Class III landfills, transformation facilities, and exports to out-of-County landfills was approximately 11 million tons in 2020. The total remaining permitted Class III landfill capacity in the County is estimated at 142.67 million tons, with a total estimated daily disposal rate of 19,723 tons per day, and the remaining lifespan of each landfill ranges from 8 to 35 years. In addition, the permitted inert waste landfill serving the County is Azusa Land Reclamation. This facility has 64.64 million tons of remaining capacity and an average daily in-County disposal rate of 1,032 tons per day.

Nine Class III landfills and one inert waste landfill with solid waste facility permits are currently serving the County.[91] In addition, there is one solid waste transformation facility within Los Angeles County that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery. Based on the 2020 CoIWMP Annual Report, the countywide cumulative need for Class III landfill disposal capacity through the year 2035 will exceed the remaining permitted Class III landfill capacity. Therefore, the 2020 CoIWMP Annual Report evaluates seven scenarios to increase capacity and determined the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with existing capacity under six of the seven scenarios. The 2020 CoIWMP Annual Report concludes that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies,

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

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

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

expand transfer and processing infrastructure, and use out-of-county disposal, including waste by rail.

The City of Los Angeles is currently diverting 76.4 percent of its waste from landfills.[92] The City has adopted the goal of achieving 90 percent diversion by 2025.[93] To this end, the City of Los Angeles implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling.

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

Construction

As previously discussed, the Project includes the development of new soundstage, specialty/production support, media campus office, facility support, utility support, general office uses, and a child care facility. Pursuant to the requirements of SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. Furthermore, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the 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. 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 USEPA and after accounting for mandatory recycling, the Project would require the disposal of approximately 14,176 tons of construction-related waste, as shown in **Table XIX-1**, *Estimated Project Construction and Demolition Waste Generation and Disposal*. It should be noted that soil export is not included in the calculation of construction waste since soil is not disposed of as waste but, rather, is typically used as a cover material or fill at other construction sites requiring soils import. Given the remaining permitted capacity at the Azusa Land Reclamation facility, which is approximately 64.64 million tons, as well as the remaining 142.67 million tons of capacity at the Class III landfills

[92] LASAN, Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=alxb kb91s_4&_afrLoop=18850686489149411#!, accessed February 9, 2023.

[93] City of Los Angeles, Solid Waste Integrated Resource Plan, October 2013.

serving the County, 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 14,176 tons of construction-related waste represents approximately 0.020 percent of the remaining capacity (64.64 million tons) at the Azusa Land Reclamation facility and 0.009 percent of the remaining capacity (142.67 million tons) at the Class III landfills serving the County. In addition, any contaminated soil that may be encountered during excavation would be disposed of in accordance with all applicable regulations.

Table XIX-1
Estimated Project Construction and Demolition Waste Generation and Disposal

Construction Phase [a]	Size	Generation Rate(lbs/sf)[b]	Waste Generated (tons)
Demolition Waste:			
Building Demolition	465,507 sf	158[b]	36,775
Asphalt Demolition	147,387 cf	145[c]	10,686
Construction Waste:			
Proposed Uses	2,101,583 sf	4.34[b]	4,560
New Parking Floor Area	2,157,000 sf	4.34[b]	4,681
Total Construction and Demolition Waste Prior to Recycling			56,702
Total Construction-Related Waste Sent to Landfill (After 75% Diversion)			**14,176**

lbs = pound

sf = square feet

cf = cubic feet

a Includes all proposed uses on the Project site.

b U.S. Environmental Protection Agency, EPA530-R-09-002, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, Tables 2-2 and 2-4, March 2009.

c Surface area of asphalt to be removed is 294,774 square feet. The thickness of the asphalt is conservatively estimated to be 6 inches thick. As such, 147,387 cubic feet of asphalt is to be removed. Each cubic foot of asphalt is estimated to weigh 145 pounds (https://www.pavepro.com/how-to-calculate-asphalt-tonnage/#:~:text=The%20weighted%20density%20of%20asphalt,of%20asphalt%20you%20are%20using).

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. Accordingly, construction impacts to solid waste

facilities would be less than significant, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

Operation

Upon full buildout, the Project would result in a net increase in solid waste disposal of approximately 535 tons per year, as shown in **Table XIX-2**, *Estimated Project Operational Solid Waste Generation and Disposal*. 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.[94] FOX currently implements the following recycling programs that would be expanded to include Project development which reflect the goals set forth in the City's Zero Waste Plan: (1) source separation of general waste vs. recyclables, (2) food waste recycling, (3) separating organics from the general waste stream, (4) providing recycling bins wherever trash cans are located in outdoor areas, and (5) purchasing practices prioritizing recyclables.

The Project's estimated net increase of 535 tons per year for solid waste disposal represents less than 0.001 percent of the remaining capacity (142.67 million tons) at the Class III landfills serving the County.

[94] City of Los Angeles, Solid Waste Integrated Resource Plan, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?_adf.ctrl-state=1cpa6bybjt_303&_afrLoop=1622606800036116#!, accessed February 9, 2023.

Table XIX-2
Estimated Project Operational Solid Waste Generation and Disposal

Land Use	Number of Employees[a]	Solid Waste Generation Factor (tns/employee/yr)[b]	Solid Waste Generation (tons/year)
CCS Specific Plan			
New Construction and Adaptive Reuse			
Media Campus Office	795	0.37	294
Specialty Space	772	0.92	710
Soundstage	417	0.92	384
Facility Support	196	0.92	180
Utility Support	10	0.92	9
General office	3,861	0.37	1,429
Total New Construction and Adaptive Reuse			***3,006***
Demolition			
Media Campus Office	856	0.37	317
Specialty Space	294	0.92	270
Soundstage	149	0.92	137
Facility Support	18	0.92	17
Utility Support	0	0.92	0
Total Demolition			**741**
Net New Floor Area			**2,265**
Pico Properties			
Reuse of Floor Area			
Child Care	12	0.50	6
General Office	11	0.37	4
Total Reuse of Floor Area			**10**
Demolition			
Total Demolition	11	0.92	**10**
Floor Area to Remain			**0**
Net New Floor Area (Prior to Recycling):			**2,265**
Total Solid Waste Sent to Landfill after Diversion:			**535**

Note: sq. ft. = square feet; lbs = pounds; tns = tons; yr = year

a See employee estimates in Section XIV.

B Solid waste generation rates from LASAN City Waste Characterization and Quantification Study, Table 4, July 2002. Assumes services motion picture for soundstages, specialty space and support; services business rate for office space.

C Consistent with the current Citywide diversion rate of 76.4 percent.

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. As such, impacts would be less than significant, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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

Less than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce GHG emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in “zero waste” by 2030. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste on or 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, as of September 2020, businesses that generate two 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.[95] 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's Curbside Recycling Program. In addition, as discussed above, pursuant to LAMC Sections 66.32 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 mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

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

XX. WILDFIRE

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
a.	Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
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?

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

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

No Impact (Checklist Questions XVIII.a. through d.). The Project Site is located in a developed, urbanized, generally flat area of the City, 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.[96] As such, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. No impacts regarding wildfire risks or related post-fire conditions would occur, and no mitigation measures are required. Therefore, no further analysis of this topic is required in the EIR.

[96] City of Los Angeles, Department of City Planning, Zone Info & Map Access System (ZIMAS), Parcel Profile Report for APN 4315019013(10201 W. Pico Boulevard), APN 4315014004 (10267 W. Pico Boulevard), APN 4315014093 (10271 W. Pico Boulevard), and APN 4315014092 (10275 W. Pico Boulevard), June 23, 2023.

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 fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, 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 which 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, 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 indicated previously in this Initial Study, the Project is located in an urbanized area and does not serve as habitat for fish or wildlife species. In addition, no known sensitive plant or animal community or special status species occur on the Project Site. Therefore, the Project would not 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 reduce the number or restrict the range of a rare or endangered plant or animal.

However, as indicated previously, the Project could potentially affect historic resources. As such, further analysis of Project impacts on historic resources will be provided in the EIR.

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

Potentially Significant Impact. The potential for cumulative impacts occurs when the impacts of the Project are combined with the impacts of related projects in proximity to the Project Site, thereby resulting in impacts that are greater than the impacts of the Project alone. Located within the vicinity of the Project Site are other past, current and/or reasonably foreseeable projects whose development, in conjunction with that of the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in the EIR for the following subject areas: aesthetics; air quality; cultural resources (historic resources and archaeological resources); energy; GHG emissions; hazards and hazardous materials; land use and planning; noise; public services (fire protection and police protection); transportation; tribal cultural resources; and utilities and service systems (water supply and wastewater).

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

As it relates to biological resources, the Project vicinity is located in an urbanized area, 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. As with the Project, related projects involving tree removals would be required to comply with the Migratory Bird Treaty Act, which regulates vegetation removal during the nesting season to ensure significant impacts to migratory birds do not occur. Protected trees that would be removed as a result of the Project would be replaced in accordance with the City's Protected Tree and Shrub Ordinance (Ordinance No. 186,873). All related projects, as with the Project, would be subject to the City's Protected

Tree and Shrub Ordinance and the Los Angeles City Planning CP-4068 [07.07.2022] Tree Report Template. Thus, all related projects would require appropriate analysis of potential impacts and mitigation, as necessary, to reduce such impacts to the extent feasible. As such, the Project would not contribute to a cumulative effect.

As discussed above, the Project would not exacerbate or contribute to substantial seismic or other adverse geologic effects. Further, potential impacts to geology and soils are typically site-specific. Although the Project Site could be subjected 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 mitigated by design and construction in conformance with current building codes and engineering practices. As such, the Project would not have a considerable contribution to a cumulative effect.

With regard to paleontological resources, each of the related projects, as with the Project, would be subject to applicable regulations formulated to avoid significant impacts to paleontological resources, including but not limited to CEQA mitigation and/or the City's standard Condition of Approval paleontological resources. Therefore, with adherence to applicable regulations, the Project and related projects would not result in significant cumulative impacts on paleontological resources.

With regard to hydrology and water quality, related project development could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, related projects, as with the Project, would be subject to the City's LID requirements. In addition, construction projects greater than one acre would be subject to NPDES permit requirements, including development of a Stormwater Pollution Prevention Plan, Standard Urban Stormwater Mitigation Plan requirements during operation, and other local requirements pertaining to hydrology and surface water quality, while smaller construction projects would be subject to local erosion control regulations, including the requirement to prepare a Local SWPPP. It is anticipated that related projects would also be evaluated on an individual basis by the City of Los Angeles Department of Public Works to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. The Project would also improve runoff conditions compared to existing conditions. Thus, with implementation of standard regulatory requirements, Project impacts related to hydrology and water quality would not be cumulatively considerable and, cumulative impacts would be less than significant.

With regard to public services, such as schools, parks, and other public facilities (libraries), the Project does not include residential uses and, therefore, would not contribute substantially to a

cumulative impact on schools, parks, and libraries. Therefore, cumulative impacts related to these public facilities would be less than significant.

With regard to solid waste, given the level of urbanization present throughout the Project vicinity, it is anticipated that other projects would similarly represent a minor percentage of the remaining capacity of the County's Class III landfills open to the City. The demand for landfill capacity is continually evaluated by the County through preparation of the CoIWMP annual reports. Each annual COIWMP report assesses future landfill disposal needs over a 15-year planning horizon. Based on the 2020 CoIWMP Annual Report, the County anticipates that future disposal needs can be adequately met for the next 15 years (i.e., 2035) with implementation of strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail.[97] The preparation of each annual COIWMP provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Furthermore, in future years, it is anticipated that the rate of declining landfill capacity would slow considering the City's goal to achieve zero waste by 2030. Therefore, cumulative impacts with respect to solid waste would be less than significant.

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

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

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project could result in potentially significant impacts with regard to the following topics: aesthetics, air quality; cultural resources (historic resources and archaeological resources); energy; GHG emissions; hazards and hazardous materials; land use and planning; noise; public services (fire protection and police protection); transportation; tribal cultural resources; and utilities and service

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

systems (water supply and wastewater). As a result, further analyses of these topics will be provided in the EIR.