

# **INITIAL STUDY**

## 6000 Hollywood Boulevard Project

Case Number: ENV-2022-6688-EIR

Project Location: 5950-6048 West Hollywood Boulevard, and 6037 West Carlton Way, Los

Angeles, CA 90028

Community Plan Area: Hollywood

Council District: CD-13—Soto-Martinez

**Project Description:** The Project is a new mixed-use development that would include 342,643 square feet of residential uses (350 units), 136,000 square feet of commercial office uses, and 22,542 square feet of commercial uses, including 18,004 square feet of retail, 4,038 square feet of restaurant uses, and 500 square feet of support uses. The Project would remove 31,833 square feet of existing commercial uses and parking. The proposed uses would be provided within a 35-story residential building, a six-story office building, and 11 townhome style structures, which would all be atop a parking podium and be located within the Hollywood Lot. A four-story residential building with 46 residential units would be located within the Carlton Lot. The Project would include a total of 894 parking spaces within three subterranean parking levels. The Project would include a total of 42,602 square feet of open space, including 23,526 square feet of publicly accessible privately owned open space and 19,076 square feet of private open space. Upon completion, the Project would comprise a total floor area of 501,185 square feet with an overall FAR of 3.08:1.

#### PREPARED FOR:

The City of Los Angeles Department of City Planning

#### PREPARED BY:

Eyestone Environmental, LLC

#### APPLICANT:

6000 Hollywood Boulevard Associates, LLC

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## 1 INTRODUCTION

An application for the proposed 6000 Hollywood Boulevard Project (Project) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles, as Lead Agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA), and that the preparation of an Initial Study is required.

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

#### 1.1 PURPOSE OF AN INITIAL STUDY

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

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

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 (Footnote continued on next page)

#### 1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

#### 1 INTRODUCTION

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

#### **2 EXECUTIVE SUMMARY**

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

#### **3 PROJECT DESCRIPTION**

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

#### **4 EVALUATION OF ENVIRONMENTAL IMPACTS**

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

#### 1.3 CEQA PROCESS

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

#### 1.3.1 Initial Study

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

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

<sup>(</sup>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.

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 6000 Hollywood Boulevard

ENVIRONMENTAL CASE NO. ENV-2022-6688-EIR

RELATED CASES ZA-2022-6687 -DB-CU-CUB-SPR-VHCA; VTT-83897-VHCA

PROJECT LOCATION Los Angeles

COMMUNITY PLAN AREA Hollywood

GENERAL PLAN DESIGNATION Highway Oriented Commercial (Hollywood Lot) / High Medium

Residential (Carlton Lot)

ZONING C4-1-SN (Hollywood Lot)/[Q]R4-1VL (Carlton Lot)

COUNCIL DISTRICT CD-13—Soto-Martinez

LEAD AGENCY City of Los Angeles

CITY DEPARTMENT Department of City Planning

STAFF CONTACT Bob Babajian

ADDRESS 221 North Figueroa Street, Suite 1350

Los Angeles, CA 90012

PHONE NUMBER (213) 978-1305

EMAIL bob.babajian@lacity.org

APPLICANT 6000 Hollywood Boulevard Associates, LLC

ADDRESS 1901 Avenue of the Stars, Los Angeles, CA 90067

PHONE NUMBER (310) 788-2417

#### **ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED**

pages. Aesthetics □ Greenhouse Gas Emissions □ Public Services ☐ Agriculture & Forestry Resources Hazards & Hazardous Materials ☐ Recreation Air Quality ☐ Hydrology/Water Quality □ Land Use/Planning ☐ Biological Resources □ Cultural Resources ☐ Mineral Resources □ Utilities/Service Systems ☐ Wildfire Noise
 ■
 Noise
 Noise ☐ Population/Housing Mandatory Findings of Significance **DETERMINATION** (To be completed by the Lead Agency) On the basis of this initial evaluation: I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared. ☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. ☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. Bob Babajian, Planning Assistant May 26, 2023 PRINTED NAME, TITLE DATE

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

#### **EVALUATION OF ENVIRONMENTAL IMPACTS**

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

#### 3.1 PROJECT SUMMARY

The 6000 Hollywood Boulevard Project (Project) is a new mixed-use development proposed on a 163,327-square-foot (3.75-acre) site comprised of nine lots south of Hollywood Boulevard (Hollywood Lot) and one adjoining lot along Carlton Way between Bronson Avenue to the east and Gower Street to the west (Carlton Lot). The Hollywood Lot is currently developed as an automotive dealership for Toyota, and includes a showroom, parts storage structure, auto repair facility with five service bays, and surface parking. The existing structures on the Hollywood Lot total approximately 31,833 square feet. The Carlton Lot contains surface parking. The Hollywood Lot and the Carlton Lot are collectively referred to herein as the Project Site. The Project Site is located in the Hollywood Community Plan area of the City of Los Angeles (City).

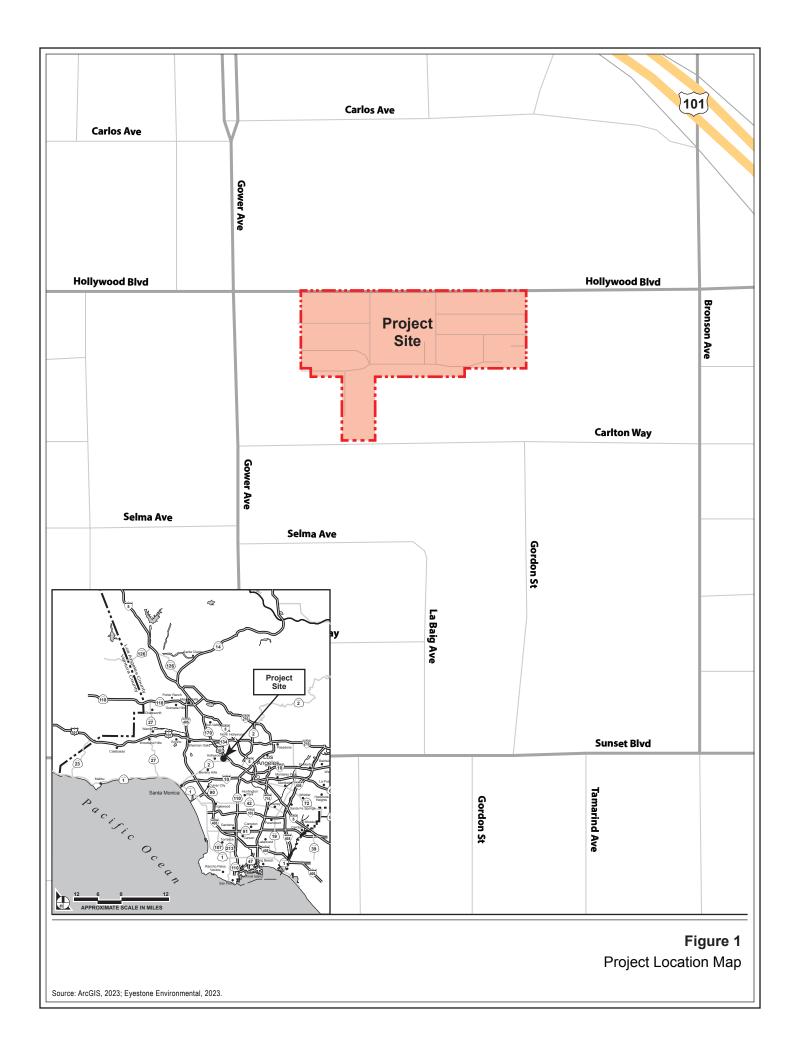
The Project would include 342,643 square feet of residential uses (350 units), 136,000 square feet of commercial office uses, and 22,542 square feet of commercial uses, including 18,004 square feet of retail, 4,038 square feet of restaurant uses, and 500 square feet of support uses. The Project would remove 31,833 square feet of existing commercial uses and parking. The proposed uses would be provided within a 35-story residential building, a six-story office building, and 11 townhome style structures, which would all be atop a parking podium and be located within the Hollywood Lot. A four-story residential building with 46 residential units would be located within the Carlton Lot. The Project would include a total of 894 parking spaces within three subterranean parking levels that would extend to a maximum depth of 30 to 40 feet. The Project would include a total of 42,602 square feet of open space, including 23,526 square feet of publicly accessible privately owned open space and 19,076 square feet of private open space. Upon completion, the Project would comprise a total floor area of 501,185 square feet with an overall FAR of 3.08:1.

#### 3.2 ENVIRONMENTAL SETTING

#### 3.2.1 Project Location

As shown in Figure 1 and Figure 2 on pages 8 and 9, the Project Site is generally bounded by Hollywood Boulevard to the north, Bronson Avenue to the east, Carlton Way to the south, and Gower Street to the west. The Project Site encompasses the following addresses: 5950, 5960, 5962, 6000, 6010, 6016, 6020, 6024, 6024½, 6030, 6038, 6044, and 6048 West Hollywood Boulevard and 6037 West Carlton Way within the Hollywood Community Plan Area of the City. The Project Site is located approximately 12 miles east of the Pacific Ocean.

Regional access to the Project Site is provided by Hollywood Boulevard located just north of the Project Site, Sunset Boulevard located south of the Project Site, and US-101, which is accessible within approximately 730 feet of the Project Site. Local access to the Project Site is provided by several local streets and avenues, including Gower Street and Bronson Avenue.



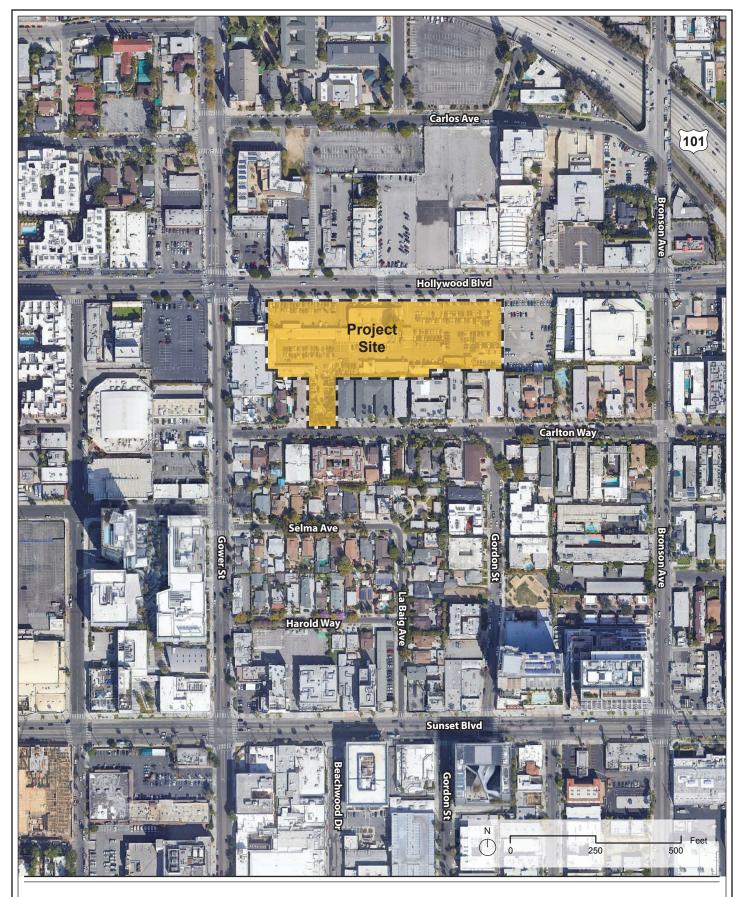


Figure 2
Aerial Photograph of the Project Vicinity

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

#### 3.2.2 Existing Conditions

The Project Site is currently occupied primarily by an automotive dealership for Toyota that includes a showroom, parts storage structure, auto repair facility with five service bays, and surface parking. The existing structures total approximately 31,833 square feet. Vehicular access to the Project Site is currently provided via driveways along Hollywood Boulevard and Carlton Way. Pedestrian access to the Hollywood Lot is currently provided along Hollywood Boulevard and Gower Street, and pedestrian access to the Carlton Lot is currently provided along Carlton Way.

Landscaping within the Project Site includes ornamental trees and landscaping. Based on the Tree Report included in Appendix IS-1 of this Initial Study, a total of 33 trees were identified within and surrounding the Project Site, including 15 on-site trees and 18 street trees. Street trees and trees within the Project Site consist of various non-native species, including one Chinese pistache, two pink trumpet trees, three Canary Island pine trees, three Indian laurel fig trees, three saucer magnolia trees, four southern magnolia trees, seven Mexican fan palm trees, and 10 evergreen pear trees. As discussed in the Tree Report, in order to describe tree size, the City's Planning Division considers any tree "significant" if it has a trunk diameter of eight inches or greater. Based on the Tree Report included in Appendix IS-1 of this Initial Study, the 15 on-site trees are considered "significant" as defined by the City's Planning Division based on their trunk diameter size of eight inches or greater. As determined in the Tree Report, none of the on-site or off-site trees are considered to be protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.<sup>2,3</sup>

The Project Site is located within the Hollywood Community Plan area. The Hollywood Lot has a General Plan land use designation of Highway Oriented Commercial and is zoned C4-1-SN (Commercial zone, Height District 1, Hollywood Signage Supplemental Use District). Pursuant to the LAMC, the C4 Zone permits a wide array of land uses including commercial, office, residential, retail, and hotel uses. Height District 1, in conjunction with the C4 Zone, typically does not impose a maximum building height limitation and permits a maximum 1.5:1 FAR. The SN designation indicates that these parcels are located within the Hollywood Signage Supplemental Use District (HSSUD) and any signage proposed as part of the Project would be subject to its provisions and regulations.

The Carlton Lot has a General Plan land use designation of High Medium Residential and is zoned [Q]R4-1VL (Qualified Conditions, Multiple Dwelling zone, Height District 1 Very Limited). Pursuant to the LAMC, the R4 Zone permits any use permitted in the R3 Multiple Dwelling Zone, churches, childcare facilities or nursery schools, schools, museums or libraries, accessory uses and home occupations, retirement hotels, and accessory buildings. Height District 1 Very Limited imposes a maximum building height of 45 feet. The Q Condition limits density to one dwelling unit per 600 square feet of lot. (Ordinance No. 165,662.)

Carlberg Associates, Hollywood Toyota—6000 Hollywood Boulevard, Los Angeles, California 9028—City of Los Angeles Tree Report, May 24, 2022. See Appendix IS-1 of this Initial Study.

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

The Project Site is also located within the boundaries of the Hollywood Redevelopment Plan, which establishes a base FAR limit of 3:1 for all development with a land use designation of Highway Oriented. The Project Site is also identified as being located in a Transit Priority Area (TPA), as defined by Senate Bill (SB) 743 and City Zoning Information File (ZI) 2452.<sup>4</sup> The Project Site is well served by a variety of public transit options along Hollywood Boulevard provided by the Los Angeles County Metropolitan Transportation Authority (Metro) and the Los Angeles Department of Transportation (LADOT). Specifically, transit options in the vicinity of the Project Site include the Hollywood/Vine station of the Metro B (Red) Line, located approximately 0.3 mile west of the Project Site, and several Metro bus lines along Hollywood Boulevard as well as DASH Hollywood.

Additionally, per Assembly Bill (AB) 2097, the Project is not required to provide parking. Specifically, on September 22, 2022, AB 2097 was adopted by the State of California and subsequently added to California Government Code Section 65863.2. AB 2097 prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within one-half mile of a Major Transit Stop.

#### 3.2.3 Surrounding Land Uses

The area surrounding the Project Site is highly urbanized and includes a mix of low- to mid-rise buildings containing a variety of uses, including a myriad of dining, entertainment, commercial, and residential uses. The surrounding properties are generally zoned for C4 commercial use or R4 multiple dwelling residential use, consistent with the zoning of the Project Site.

To the north of the Project Site, across Hollywood Boulevard, are several commercial uses in one-and two-story structures. Specifically, at the northeast corner of Hollywood Boulevard and Gower Street is a two-story strip mall centered around a surface parking lot that includes more than a dozen casual dining, convenience store, personal care, and other uses. Adjacent to the commercial strip mall is a two-story office building with surface parking that contains a social services group and nurse practitioner, among other uses. A one-story building that contains a recording studio is to the east of the office building, followed by a two-story night club that features electronic music concerts, then two large surface parking lots. To the east of the surface parking lots is another nightclub, Florentine Gardens LA, followed by a Salvation Army. To the immediate east of the Hollywood Lot is "Banana Bungalow Hollywood Hotel & Hostel," a Tiki-inspired hostel with dorm rooms and activities. To the west is surface parking and two one-story commercial structures. The Carlton Way Pocket Park is also at the southeast corner of the Hollywood Lot.

South of the Hollywood Lot—and to the east and west of the Carlton Lot—are a series of multi-family apartment units, in which some commercial uses are mixed. Multi-family apartments are also across the street to the south of the Carlton Lot.

are not considered significant as a matter of law.

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

A wide range of iconic entertainment, cultural, and employment locations are within a half mile radius of the Project Site. These include the Hollywood Walk of Fame (approximately 225 feet), the Fonda Theater (approximately 350 feet), Amoeba Music (approximately 0.25 mile), the Capitol Records Building (approximately 0.4 mile). Netflix and the Sunset Bronson Studios are similarly close (approximately 0.25 mile).

#### 3.3 DESCRIPTION OF PROJECT

#### 3.3.1 Project Overview

As summarized below and in Table 1 on page 13, the Project would replace the existing automotive dealership and surface parking on the Project Site with a mixed-use development that will comprise 501,185 square feet of new residential, commercial, and retail floor area across multiple structures that would be integrated with public and private open space. As shown in Figure 3 through Figure 8 on pages 14 through 19, the proposed uses would be provided within a six-story, 113-foot office and retail building (Building A, height of 120 feet with mechanical) along the northwest portion of the Project Site; a 35-story, 404-foot residential tower (Building B, height of 419 feet with mechanical) along the northeast portion of the Project Site that would contain 265 residential units; 11 low-rise structures ranging from two to three stories; and a four-story, 44.5-foot residential building located entirely on the Carlton Lot (Building C, height of 56 feet with mechanical) that would contain 46 units. The proposed 35-story residential building, six-story office building, and 11 low-rise style structures would all be atop a parking podium and be located along Hollywood Boulevard within the Hollywood Lot. One of the low-rise structures would be used as a 4,038-square-foot two-story restaurant. The remaining 10 structures would include 39 townhomes with ground floor retail. Each of these 10 structures would be between two and three stories above the podium with a maximum height of 98 feet. Overall, the Project would include 342,643 square feet of residential uses (350 units), 136,000 square feet of commercial office uses, and 22,542 square feet of retail uses, including 18,004 square feet of retail, 4,038 square feet of restaurant uses, and 500 square feet of support uses. The overall floor area ratio (FAR) would be 3.08:1.

#### 3.3.2 Design and Architecture

As shown in the conceptual renderings provided in Figure 9 and Figure 10 on pages 20 and 21, the Project is designed in a contemporary architectural style with three primary buildings, parking podium and 11 low-rise structures dispersed throughout the Project Site between the three primary buildings. The first of the three primary buildings (Building A) is a six-story office and retail building that would be located along the northwest portion of the Project Site and would comprise 136,000 square feet. Building A would be 113 feet in height (120 feet including office mechanical). The ground floor would include a lobby and retail spaces. The second through sixth floors would include additional office lobbies and office space. Building A would also include several outdoor patios for use by the office tenants. The automotive use on the ground floor of Building A would include space for automotive sales and an automotive showroom.

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

Table 1
Summary of Existing and Proposed Floor Area<sup>a</sup>

Land Use	Floor Area				
Existing (All to Be Removed)					
Commercial (Automotive Dealership)	31,833 sf				
Total Existing Floor Area to Be Removed	31,833 sf				
New Construction					
Residential	342,643 sf (350 units)				
Office	136,000 sf				
Retail/Restaurant	22,542				
Total New Construction	501,185 sf				
Net Floor Area Upon Completion	469,352 sf				

sf = square feet

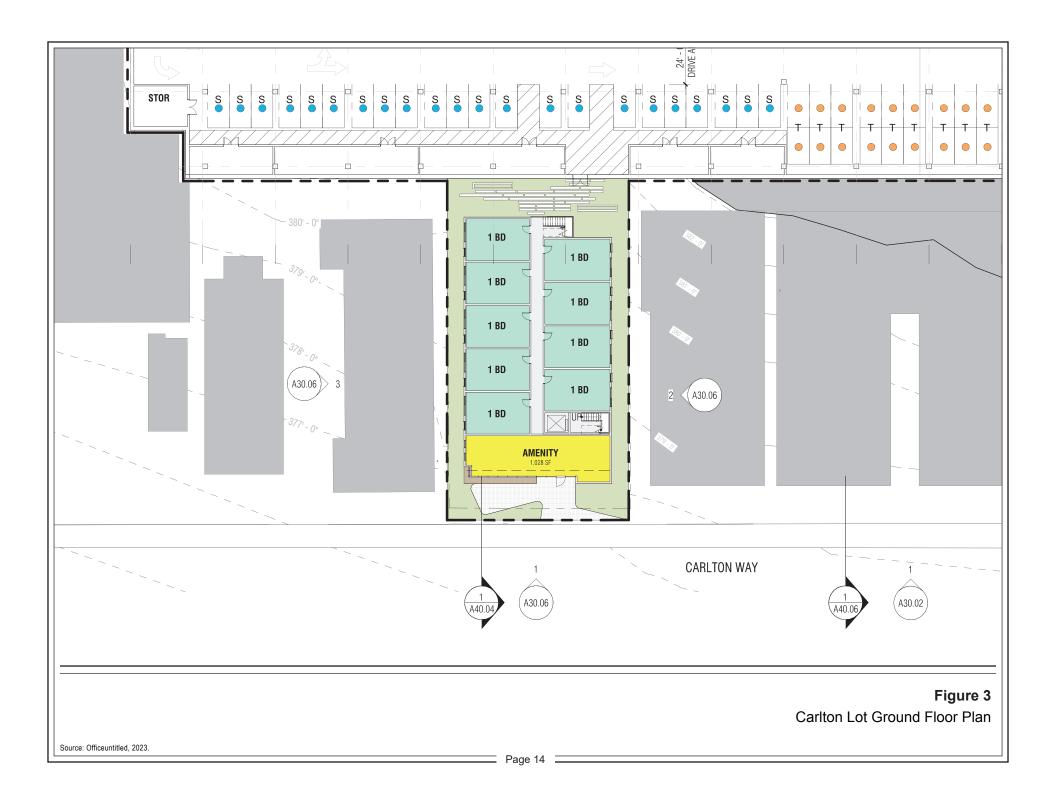
Source: Office Untitled, 2022.

Building B is a residential tower located on the northeast portion of the Project Site. Building B would be 35 stories and 404 feet in height (419 feet including tower mechanical). Building B would comprise 289,079 square feet and would contain 265 units, a residential lobby, and residential amenities. The residential lobby would be provided at the ground level and would be accessible from Hollywood Boulevard. Residential amenity space would be provided at podium level and at Level 13 including an elevated terrace with a pool and spa. Building C is a four-story residential building located entirely on the Carlton Lot. Building C would comprise 23,560 square feet and would contain 46 units. Building C would be 44.5 feet in height (56 feet with mechanical). Building C is designed as a single structure with a pedestrian walkway on the ground level connecting to parking and a bridge at an upper level connecting to the podium of the Hollywood Lot.

Between Buildings A, B, and C would be 11 low-rise structures ranging from two to three stories above the podium. One of these structures would be used as a 4,038-square-foot two-story restaurant, surrounded by approximately half an acre of public space. The remaining 10 structures would include 39 townhomes (1 unit each for a total of 39 units). Each of the 10 structures would range from two to three stories above the podium, with a maximum height of 98 feet.

As shown in Figure 11 on page 22, the proposed buildings would all be integrated by a series of landscaped and hardscape open space areas that would include landscaped pedestrian walkways and plazas. The Project façade materials include metal wall panels, Glass Fiber Cement Boards, and other paneling systems.

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



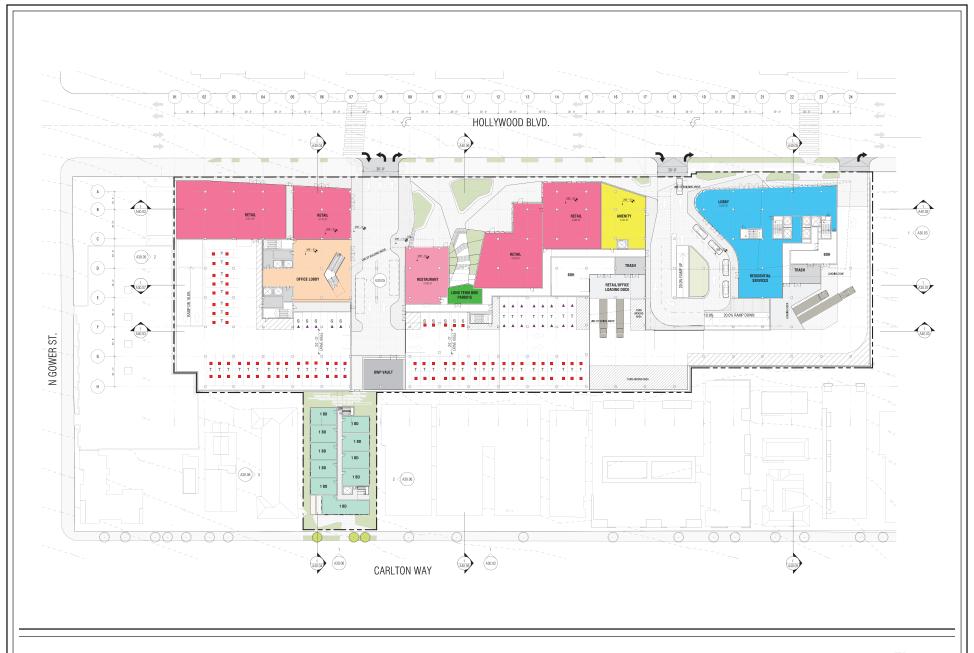


Figure 4

Hollywood Lot Ground Floor Plan and Carlton Lot Level 2 Floor Plan

Source: Officeuntitled, 2023.

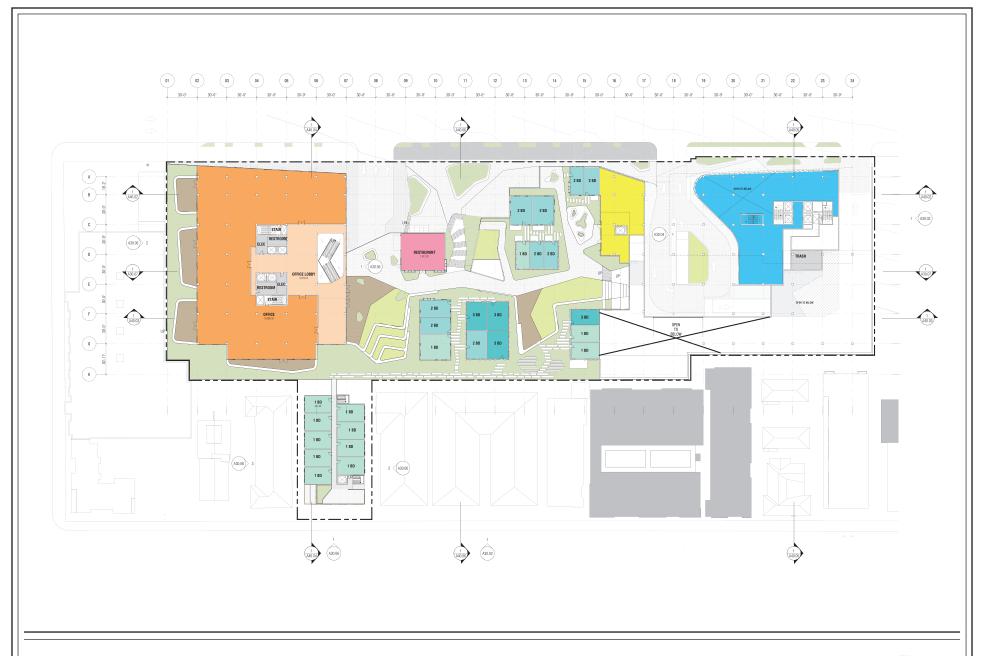
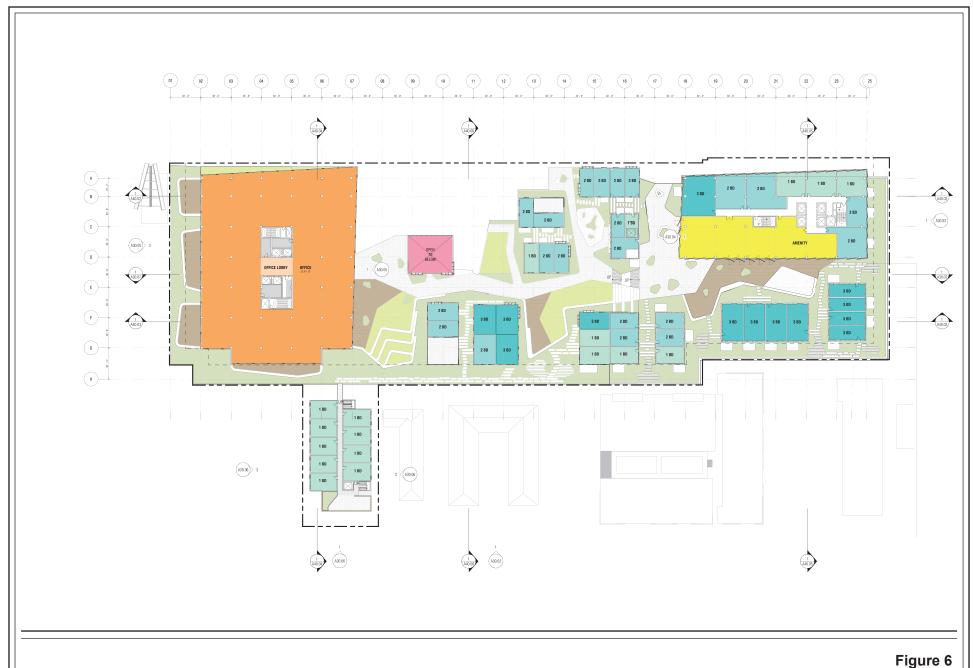


Figure 5

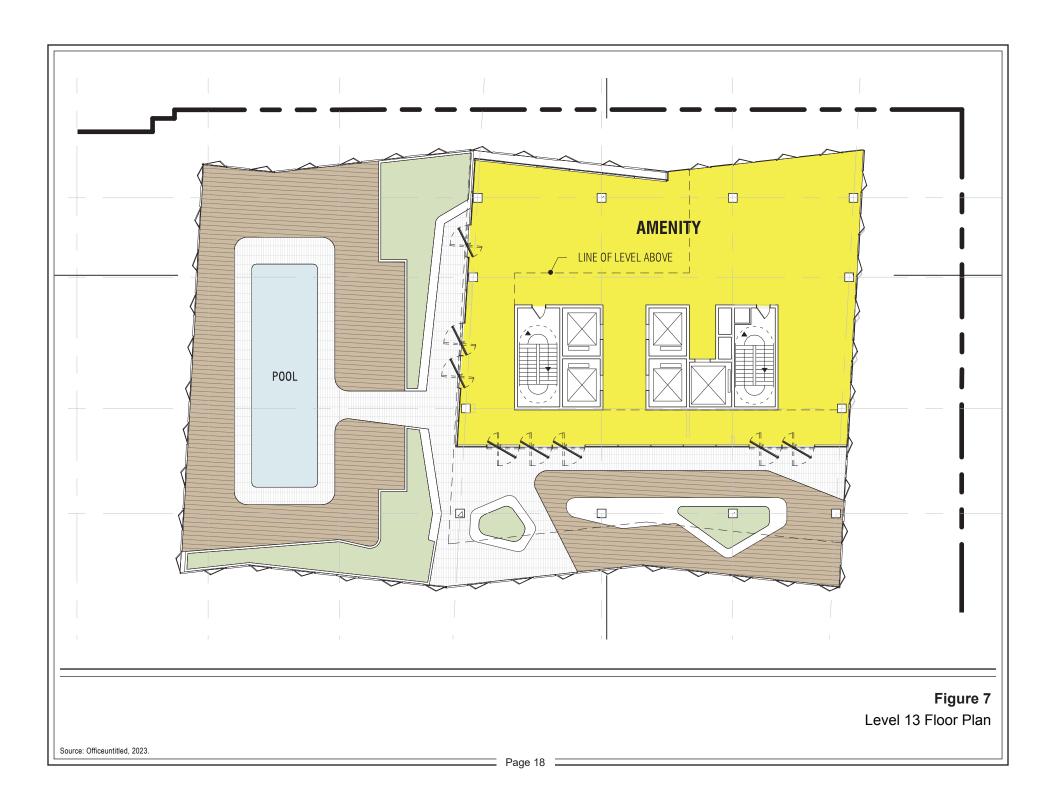
Hollywood Lot Level 2 Floor Plan and Carlton Lot Level 3 Floor Plan

Source: Officeuntitled, 2023.



Hollywood Lot Level 3 Floor Plan and Carlton Lot Level 4 Floor Plan

Source: Officeuntitled, 2023.



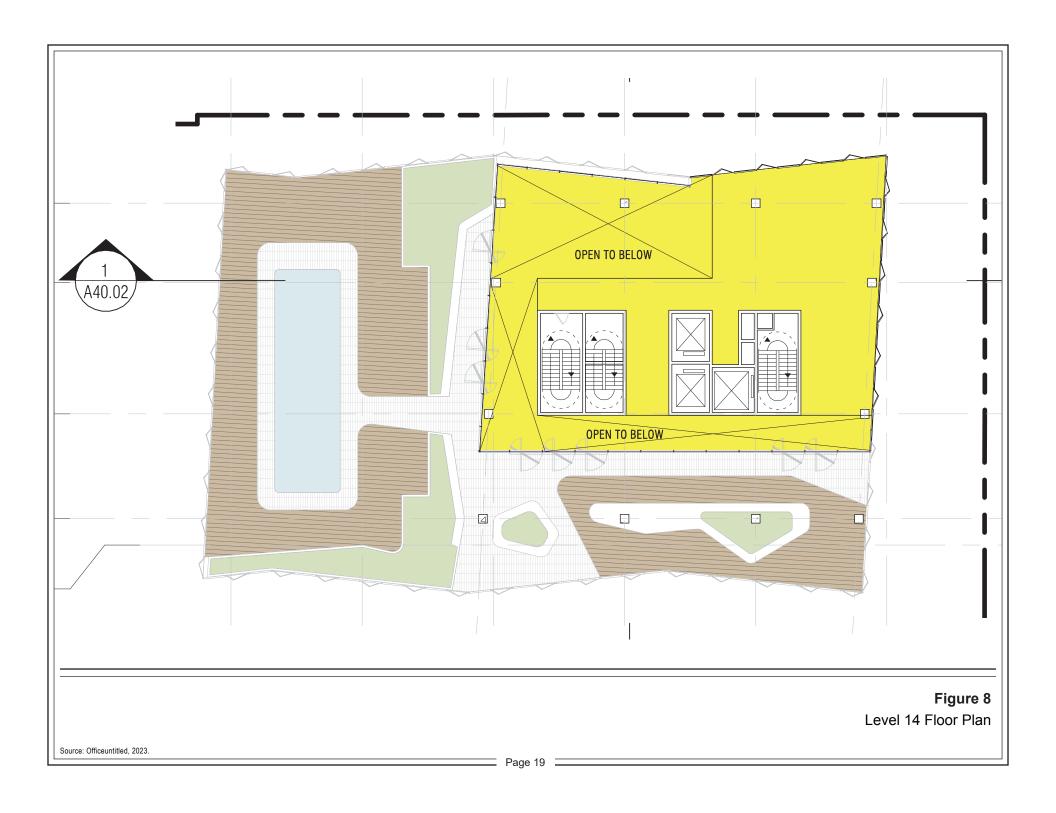




Figure 9
Conceptual Rendering

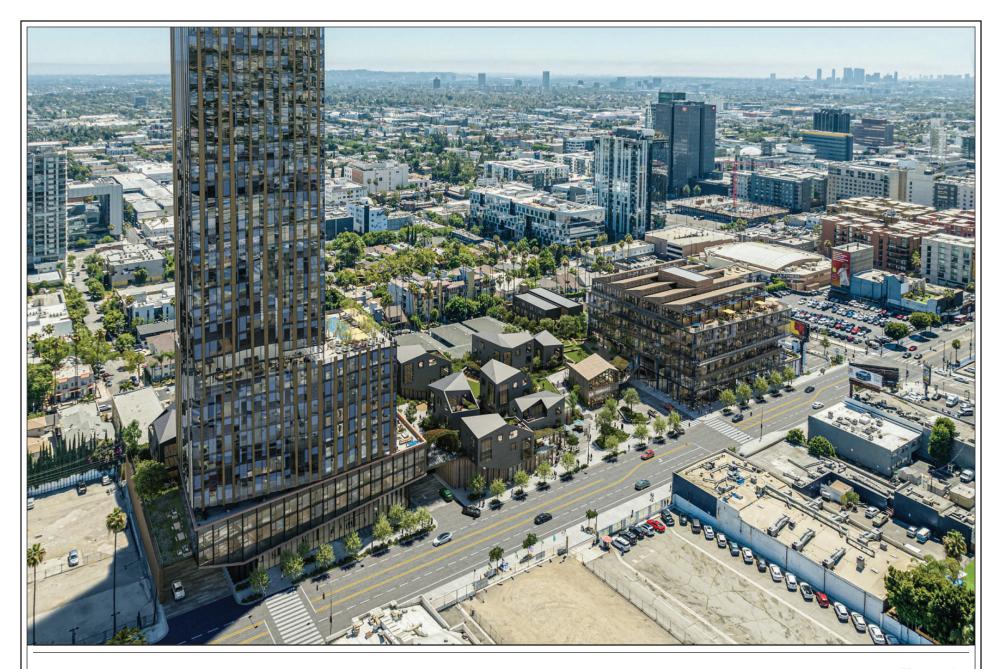


Figure 10 Conceptual Rendering



**Ground Level Landscape Plan** 



Podium Landscape Plan - Level 3



Podium Landscape Plan - Level 2



**Podium Landscape Plan - Upper Terraces** 

Figure 11
Conceptual Landscape Plan

#### 3.3.3 Open Space and Landscaping

The Project would incorporate numerous on-site common and private open space and recreational amenities. The Project would include a total of 42,602 square feet of open space, including 23,526 square feet of publicly accessible privately owned open space and 19,076 square feet of private open space. As shown in Figure 11 on page 22, the Project would provide common open space at the ground level that could be publicly accessible during daytime hours in the form of gardens, courtyards, As illustrated in Figure 11, the primary public open space amenity would be a landscaped and paved central plaza along Hollywood Boulevard, which would include access to retail, outdoor dining, and terrace stairs that provide additional gathering space as well as access to a landscaped upper plaza and residential garden walk. Interior common areas would include resident amenities such as a pool deck, view deck, fitness areas, game rooms, lounges and meeting rooms. Additional common area open spaces would be provided in gardens and terraces throughout the Project Site. The residential structures would also include roof top open spaces. The LAMC requires 1 tree per 4 units creating a need to plant 88 trees for the Project. The Project would include 88 on-site trees, in compliance with this requirement. As part of the Project, the 15 existing on-site trees and 18 street trees would be removed to accommodate development of the Project. The proposed removal of street trees would be subject to the review and approval by the Bureau of Street Services, Urban Forestry Division. On-site trees to be removed would be replaced at a 1:1 ratio and street trees would be replaced on a 2:1 basis in accordance with the Bureau of Street Services. Urban Forestry Division's requirements.

#### 3.3.4 Access, Circulation, and Parking

Pedestrian access to the Project Site would be provided at several access points around the perimeter of the Project Site, including along Hollywood Boulevard and Carlton Way. Bicycle access would be provided via the pedestrian access points and three driveways along Hollywood Boulevard. Additionally, the Project would include 42 short-term and 202 long-term bicycle parking spaces in accordance with LAMC Section 12.21-A.16(a)(2). Short-term bicycle parking spaces would be provided on the ground level and long-term bicycle parking spaces would be provided within the subterranean parking garage. Locker rooms and showers would also be provided beside the long-term bicycle parking area and bike racks would be provided on all frontages of the Project Site.

Vehicular access to the Project Site would be provided from three driveways along Hollywood Boulevard. Access for trash pickup and other freight vehicles would be provided via a loading dock entry off of Hollywood Boulevard, adjacent to the Project Site's eastern boundary.

As previously noted, on September 22, 2022, AB 2097 was adopted by the State of California and subsequently added to California Government Code Section 65863.2. AB 2097 prohibits a public agency from imposing or enforcing any minimum automobile parking requirement on any residential, commercial, or other development project that is within one-half mile of a Major Transit Stop. Per AB 2097, the Project is not required to provide parking as it is a mixed-use project with residential and commercial uses. However, the Project would include 894 vehicle parking spaces. Parking would be provided in a maximum three-level subterranean parking garage located entirely underneath the Hollywood Lot and in a surface parking area within the Hollywood Lot. Two levels of the subterranean parking garage would cover the entirety of the Hollywood Lot while the third level would cover only the eastern half of the Hollywood Lot. Further, pursuant to Ordinance No. 186,485, 30 percent of the Project's parking spaces will be designated as Electric Vehicle (EV) spaces capable of supporting

future electric vehicle supply equipment (EVSE), and of which 10 percent of the total spaces will be further equipped with EV Charging Stations.

#### 3.3.5 Lighting and Signage

Proposed lighting would include shielded low to medium output exterior lights adjacent to buildings and along pathways for security and wayfinding purposes. In addition, shielded low to medium output lighting to accent signage, architectural features, murals, and landscaping elements would be incorporated throughout the Project Site. All exterior lights, including lights on rooftops, would be directed onto the Project Site and designed to minimize light trespass from the Project Site. New sources of artificial lighting that would be introduced by the Project would also include interior lighting and automobile headlights. The Project would not include electronic signage or signs with flashing, mechanical, or strobe lights. All Project lighting would comply with applicable LAMC lighting standards.

Project signage would include a central identity sign and various general wayfinding and retail signs typically associated with a mixed-use project. All proposed on-site and off-site signage would fit within the permitted area per each sign type, the combined area of all signs, and the permitted sign location pursuant to the LAMC and the Hollywood Signage Supplemental Use District, as applicable.

#### 3.3.6 Site Security

The Project would include numerous security features, including a closed circuit camera system and keycard entry for the residential and office buildings and the residential and office parking areas, and on-site security personnel. The Project would also be designed such that entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways would be open and in view of surrounding sites. In addition, buildings and walkways would be properly lit in order to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings. Parking areas would also be sufficiently lit to maximize visibility and reduce areas of concealment.

#### 3.3.7 Sustainability Features

The Project would be designed and constructed to incorporate environmentally sustainable building features equivalent to certification under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) Rating System for new construction, and environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen Code. These standards would reduce energy and water usage and waste and, thereby, potentially reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The Project would incorporate sustainability features for alternative, low-carbon modes of transportation, such as a protected bicycle storage facility and electric vehicle charging infrastructure. The Project would also incorporate water conservation features through low-water use plant selections and ultra-low flow indoor water fixtures. Additionally, the Project would include exterior and interior lighting that would meet the requirements of the California Energy Commission Building Energy Efficiency Standards—Title 24, version 2022 and the National Electrical Code.

In accordance with CALGreen requirements, the Project would also ensure that at least 10 percent of the total roof area of the new buildings would be solar-ready. Specifically, the Project would provide a 500 kW photovoltaic system. Furthermore, as noted above the Project would provide parking spaces prewired to support future EVCS as well as parking spaces equipped with EVCS. Pursuant to City of Los Angeles Ordinance 186,485 and Ordinance 186,488, 30 percent of the parking spaces in the Project would be capable of supporting future EV supply equipment. Additionally, 10 percent of spaces are required to be further improved with EVCS.

#### 3.3.8 Anticipated Construction Schedule

Construction of the Project would commence with demolition of the existing structures and surface parking areas. This phase would be followed by grading and excavation for the subterranean parking, which would extend to a depth of 30 to 40 feet below ground surface, except for the construction of Building C within the Carlton Lot which would require excavation to a depth of approximately 20 feet to 25 feet. The building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to commence in 2026 and be completed in 2029. It is estimated that approximately 210,000 cubic yards of export would be hauled from the Project Site.

#### 3.4 REQUESTED PERMITS AND APPROVALS

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

- Pursuant to LAMC Section 12.22(A)(25), Density Bonus Compliance Review for a project totaling 350 dwelling units, including 44 dwelling units for very low income household occupancy, with the following two On-Menu Incentives: (1) a Floor Area Ratio increase on the Hollywood Lot from 1.5:1 to 3:1 and on the Carlton Lot from 3:1 to 4.05:1 under LAMC Section 12.22(A)(25)(f)(4), and (2) FAR, density, parking, open space, vehicle parking averaging across the entire property.
- Pursuant to LAMC Section 12.24(W)(1), Conditional Use Permit to allow the sale and dispensing of a full line of alcoholic beverages for on-site consumption in conjunction with a restaurant use.
- Pursuant to LAMC Section 16.05, Site Plan Review to allow for a development which creates more than 50 dwelling units and over 50,000 square feet of commercial floor area.
- Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map to subdivide the Project Site into nine parcels.
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

#### 3.5 RESPONSIBLE PUBLIC AGENCIES

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

### 4 ENVIRONMENTAL IMPACT ANALYSIS

The following discussion provides responses to each of the questions set forth in the City of Los Angeles Initial Study Checklist. The responses below indicate those issues that are expected to be addressed in an environmental impact report (EIR) and demonstrate why other issues would not result in potentially significant environmental impacts and thus do not need to be addressed further in an EIR. The questions with responses that indicate a "Potentially Significant Impact" do not presume that a significant environmental impact would result from the Project. Rather, such responses indicate those issues that will be addressed in an EIR with conclusions of impact reached as part of the analysis within the EIR.

#### I. AESTHETICS

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

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and 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."6

PRC Section 21099 applies to the Project. Pursuant to PRC Section 21099, the Project is a mixed-use residential project that would be located on an infill site within a TPA. The Project Site is located

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

on an infill site, as that term is defined in PRC Section 21099(a)(4), because the Project Site includes lots located within an urban area that has been previously developed. In addition, the Project Site is located within a TPA, as that term is defined in PRC Section 21099(a)(7), because the Project Site is located within one-half mile of an existing "major transit stop," the Los Angeles Metro/Rail B-Line Hollywood/Vine station. The City's Zone Information and Map Access System (ZIMAS) confirms the Project Site's location within a TPA, as defined in the ZI No. 2452. Therefore, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	cept as provided in Public Resources Code Section 099, would the project:				
a.	Have a substantial adverse effect on a scenic vista?			$\boxtimes$	
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				
C.	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				

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

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

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

Less Than Significant Impact. The Project Site is not located along a state scenic highway. The nearest officially eligible state scenic highway is along the Foothill Freeway (I-210), which lies

approximately 18 miles northeast of the Project Site.<sup>7</sup> Therefore, the Project would not substantially damage scenic resources within a state scenic highway as no scenic highways are located adjacent to the Project Site. Notwithstanding, as described above, pursuant to PRC Section 21099, the Project is a mixed-use residential project that would be located on an infill site within a TPA. Therefore, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA. Project impacts to aesthetic resources would be less than significant and no further analysis is required.

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

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

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

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

#### II. AGRICULTURE AND FOREST RESOURCES

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

California Department of Transportation, Scenic Highways, https://caltrans.maps.arcgis.com/apps/webappviewer/index. html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed April 4, 2023.

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

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

**No Impact.** The Project Site is located in an urbanized area of the City of Los Angeles. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently occupied by Toyota of Hollywood and associated structures. No agricultural uses or operations involving farmland occur on-site or in the vicinity of the Project Site. Furthermore, the Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.<sup>8,9</sup> As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur, and no further evaluation of this topic in an EIR is required.

City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5545-006-029; 005-005; 005-022, http://zimas.lacity.org/, accessed April 4, 2023.

Galifornia Department of Conservation, California Important Farmland Finder, https://maps.conservation.ca.gov/DLRP/CIFF/App/index.html?marker=-118.29152006048791%2C34.02551004278704%2C%2C%2C%2C&markertemplate=%7 (Footnote continued on next page)

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

**No Impact.** The Project Site is zoned as C4-1-SN (Commercial 4-Height District 1-Sign District) and [Q] R4-1VL (Q Condition-Multiple dwelling 4-Height District 1 Very Limited). No agricultural zoning is present on the Project Site or in the surrounding area. Additionally, the Project Site and surrounding area are not enrolled under the California Land Conservation Act and are not subject to a Williamson Act Contract.<sup>10</sup> Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract. No impacts would occur, and no further evaluation of this topic in an EIR is required.

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

**No Impact.** As previously discussed, the Project Site is located in an urbanized area and is currently occupied by Toyota of Hollywood. The Project Site does not include any forest land or timberland. In addition, as discussed above, the Project Site is not zoned for forest land and is not used as forest land.<sup>11</sup> Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the PRC. No impacts would occur, and no further evaluation of this topic in an EIR is required.

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

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

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

**No Impact.** As discussed above, the Project Site is located in an urbanized area of the City and does not include farmland or forest land. Furthermore, the Project Site and surrounding area are not mapped as farmland or forest land, are not zoned for farmland/agricultural use or forest land, and do not contain any agricultural or forest uses.<sup>12</sup> As such, the Project would not result in the conversion of

B%22title%22%3A%22%2C%22longitude%22%3A-118.29152006048791%2C%22latitude%22%3A34.025510042 78704%2C%22isIncludeShareUrl%22%3Atrue%7D&level=14, accessed April 4, 2023.

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

City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5545-006-029; 005-005; 005-022, http://zimas.lacity.org/, accessed April 4, 2023.

City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5545-006-029; 005-005; 005-022, http://zimas.lacity.org/, accessed April 4, 2023.

farmland to non-agricultural use or in the conversion of forest land to non-forest use. No impacts would occur, and no further evaluation of this topic in an EIR is required.

#### III. AIR QUALITY

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

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

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

**Potentially Significant Impact.** The Project Site is located within the 6,700-square-mile South Coast Air Basin (Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment. The Basin is currently in non-attainment for ozone, particulate matter less than 2.5 microns in size [PM<sub>2.5</sub>], and lead.<sup>13</sup> As a result, development of the Project could have a potential adverse effect on SCAQMD's implementation of the AQMP. Therefore, further evaluation of the Project's potential conflicts with the AQMP will be included in the EIR.

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

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

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

quality standards for ozone,  $PM_{2.5}$  and lead, and state air quality standards for ozone, particulate matter less than 10 microns in size ( $PM_{10}$ ), and  $PM_{2.5}$ . As a result, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Basin. Therefore, further evaluation of the Project's potential cumulative air pollutant emissions will be included in the EIR.

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

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

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

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

Construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.<sup>14</sup> In particular, Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.<sup>15</sup>

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

SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/rules-compliance/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed April 4, 2023.

<sup>&</sup>lt;sup>15</sup> SCAQMD, Rule 402, Nuisance, adopted May 7, 1976.

#### IV. BIOLOGICAL RESOURCES

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

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

**Less Than Significant Impact.** The Project Site is located in an urbanized area and is currently occupied by Toyota of Hollywood and associated structures. There are no large expanses of open

space areas adjacent to the Project. The Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles. In addition, there are no other sensitive natural communities identified by the CDFW or the USFWS. Rather, the Project Site and surrounding areas contain urbanized and disturbed land. 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 species habitat on the Project Site, it is unlikely any special status species listed by the California Department of Fish and Wildlife (CDFW)<sup>17</sup> or by the U.S. Fish and Wildlife Service (USFWS)<sup>18</sup> would be present on-site.

According to the Tree Report prepared for the Project included in Appendix IS-1 of this Initial Study, there are 15 non-protected trees on the Project Site and 18 non-protected street trees adjacent to the Project Site.<sup>19</sup> Although unlikely, these trees could potentially provide nesting sites for migratory birds. However, the Project would comply with the Migratory Bird Treaty Act (MBTA), which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. 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." While the Project would require the removal of the 33 existing trees, which could potentially provide nesting sites for migratory birds, compliance with MBTA, California Fish and Game Code, and standard construction processes during nesting season would ensure that construction activities would not adversely affect nesting sites. In accordance with MBTA and California Fish and Game Code, tree removal activities associated with the Project would take place outside of the nesting season (February 1-August 31), to the extent feasible. Should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and is based on the professional judgement of the monitoring biologist. in coordination with the CDFW.

Therefore, with compliance with the Migratory Bird Treaty Act, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW or USFWS. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

<sup>&</sup>lt;sup>16</sup> City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1C—Biological Resources Areas (Central Geographical Area), January 19, 1995, p. 2-18-5.

<sup>&</sup>lt;sup>17</sup> California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, January 2023.

United States Fish and Wildlife Service, ECOS Environmental Conservation Online System, Listed species believed to or known to occur in California, https://ecos.fws.gov/ecp/report/species-listings-by-state?stateAbbrev=CA&stateName=California&statusCategory=Listed, accessed April 4, 2023.

Carlberg Associates, Tree Report for 6000 Hollywood Boulevard, Los Angeles, CA 90028, May 24, 2022. See Appendix IS-1 of this IS.

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

**No Impact.** The Project Site is located in an urbanized area and is currently occupied by Toyota of Hollywood, including associated buildings and surface parking areas. No riparian or other sensitive natural community exists on the Project Site or in the surrounding area.<sup>20,21</sup> Furthermore, the Project Site and surroundings are not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.<sup>22,23</sup> In addition, there are no other sensitive natural communities identified by the CDFW or the USFWS.<sup>24,25</sup> Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. No impact would occur, and no further evaluation of this topic in an EIR is required.

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

**No Impact.** As discussed above, the Project Site is located in an urbanized area and is currently occupied by Toyota of Hollywood. No water bodies or state and federally protected wetlands exist on the Project Site.<sup>26</sup> As such, the Project would not have an adverse effect on state or federally protected wetlands. No impact would occur, and no further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** As described above, the Project Site is located in an urbanized area and is currently occupied by Toyota of Hollywood. In addition, the areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within or surrounding the Project Site that provide linkages to natural open spaces areas which may serve as wildlife corridors.

<sup>20</sup> City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5545-006-029; 005-005; 005-022, http://zimas.lacity.org/, accessed April 4, 2023.

United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed April 4, 2023.

<sup>&</sup>lt;sup>22</sup> City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1C—Biological Resources Areas (Central Geographical Area), January 19, 1995, p. 2-18-5.

County of Los Angeles, Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 2019.

California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), Hollywood Quad Species List, https://apps.wildlife.ca.gov/bios/, accessed April 4, 2023.

<sup>&</sup>lt;sup>25</sup> California Department of Fish and Wildlife, CDFW Lands, https://apps.wildlife.ca.gov/lands/, accessed April 4, 2023.

<sup>&</sup>lt;sup>26</sup> United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed April 4, 2023.

Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.<sup>27,28</sup>

According to the Tree Report prepared for the Project included in Appendix IS-1 of this Initial Study, there are 15 non-protected trees on the Project Site and 18 non-protected street trees adjacent to the Project Site.<sup>29</sup> Although unlikely, these trees could potentially provide nesting sites for migratory birds. However, the Project would comply with the Migratory Bird Treaty Act, which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish and Game Code Section 3503 states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." In accordance with the Migratory Bird Treaty Act and California Fish and Game Code, tree removal activities associated with the Project would take place outside of the nesting season (February 1-August 31), to the extent feasible. Should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and is based on the professional judgement of the monitoring biologist, in coordination with the CDFW. With compliance with the Migratory Bird Treaty Act, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

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

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

<sup>&</sup>lt;sup>27</sup> City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure BR-1C—Biological Resources Areas (Central Geographical Area), January 19, 1995, p. 2-18-5.

County of Los Angeles, Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 2019.

Carlberg Associates, Tree Report for 6000 Hollywood Boulevard, Los Angeles, CA 90028, May 24, 2022. See Appendix IS-1 of this IS.

replaced by other protected tree varieties and shall not be replaced by shrubs. A protected shrub shall only be replaced by other protected shrub varieties and shall not be replaced by trees, to the extent feasible as determined by the Advisory Agency, Board of Public Works, or a licensed or certified arborist.

According to the Tree Report prepared for the Project included in Appendix IS-1 of this Initial Study, existing landscaping within the Project Site includes 33 inventoried trees, including 15 on-site trees and 18 right-of-way (street) trees. The inventoried trees include three *Pinus canariensis*, one Pistacia chinensis, ten *pyrus kawakamii*, three *Ficus macrocarpa*, seven *Washingtonia robusta*, two *Handroanthus heptaphyllus*, three *Magnolia x soulangeana*, and four *Magnolia grandiflora*. None of the private property trees or right-of-way trees are considered protected by the City of Los Angeles' Tree Preservation Ordinance No. 186,873. As part of the Project, the 15 existing on-site trees and 18 street trees would be removed to accommodate development of the Project. The proposed removal of street trees would be subject to the review and approval by the Bureau of Street Services, Urban Forestry Division. As determined in the Tree Report, due to a combination of factors, including age, size and conditions, these trees are not appropriate for transplant.<sup>30</sup> On-site trees to be removed would be replaced at a 1:1 ratio and street trees would be replaced on a 2:1 basis in accordance with the Bureau of Street Services, Urban Forestry Division's requirements. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

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

**No Impact.** As described above, the Project Site is located in an urbanized area and is currently occupied by Toyota of Hollywood. No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.<sup>31</sup> Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans. No impact would occur, and no further evaluation of this topic in an EIR is required.

Carlberg Associates, Tree Report for 6000 Hollywood Boulevard, Los Angeles, CA 90028, May 24, 2022. See Appendix IS-1 of this Initial Study.

<sup>31</sup> California Department of Fish and Wildlife, California Natural Community Conservation Plans, April 2019.

#### V. CULTURAL RESOURCES

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

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

**Less Than Significant Impact.** The following analysis is based on the Historical Resources Assessment Report prepared for the Project by Architectural Resources Group, dated April 2023. All specific information in the discussion below is from this report unless otherwise noted. The Historical Resources Assessment Report is included as Appendix IS-2 of this Initial Study.

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

As discussed in detail in the Historical Resources Assessment Report, 6000 Hollywood Boulevard is not eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, and/or as a local (City of Los Angeles) Historic-Cultural Monument (HCM) or Historic Preservation Overlay Zone (HPOZ).

As described in the Historical Resourced Assessment, the Toyota of Hollywood dealership at 6000 Hollywood Boulevard is often mentioned in accounts of automotive history as the site of the first Toyota dealership in the United States—a claim that is sometimes disputed, but is generally accepted to be true and is substantiated by documentary evidence. Whether or not this was the first dealer to sell Toyotas in the nation, it can be said with certainty that the Hollywood Boulevard facility was among the earliest U.S. dealerships at which one could purchase a Toyota. When Toyota opened its first U.S. sales headquarters on Hollywood Boulevard in 1957, it occupied an existing commercial building that had previously been occupied by various other auto-oriented commercial tenants and shared space with the adjacent Hollywood Ford dealership. Historic photographs show that the building was a vernacular structure that was positioned directly on the street and lacked architectural interest or distinctive features, aside from prominent corporate signage. In 1950, a permit was issued to construct a two-story automobile servicing and repair facility (the current car wash canopy) for a different enterprise and was later incorporated into the Toyota of Hollywood facility. In 1970, permits were issued to demolish the existing showroom buildings on the site, as well as most ancillary structures along the 6000 block of Hollywood Boulevard. The small building from which Toyota made its debut into the American market was demolished as part of that project. In its place, a new automobile dealership that sold Ford, Lincoln, Mercury, and Toyota-branded vehicles was built in 1970—three years after Toyota had moved its sales headquarters to Torrance. An additional service bay (Service Bay E) was added to the rear of the Project Site in 1973, and a canopy structure (Entrance Canopy) was added to the east of the showroom building in 1982.

National Register Bulletin (NRB) 15: How to Apply the National Register for Evaluation states that to be eligible for listing, a resource must be significant, and it must also retain integrity to convey its significance. Implicit in the discussion of integrity is an understanding that a resource must retain physical characteristics from its historic period to be eligible. Per NRB 15, "the evaluation of integrity is sometimes a subjective judgment, but it must always be grounded in an understanding of a property's physical features and how they relate to its significance." Conversely, it is also understood that resources that do not retain sufficient physical characteristics from their historic period are generally not eligible for listing. Further, NRB 15 emphasizes that properties that are associated with historical events, patterns of events, or people must retain physical evidence relating to an event, pattern, or person. When this guidance is applied to the site, it does not appear to be significant for any potential association with the early history of the Toyota company. The above-referenced quidance emphasizes the importance of physical evidence in conveying associative significance; however, as noted, there are no physical features associated with the commercial building from which Toyota launched its United States operations. That building was demolished and replaced with the present-day dealership in 1970, and there are no traces of it remaining on the Project Site. Therefore, there is no direct physical relationship between the Toyota company's early history at the Project Site and the present-day dealership. The buildings associated with the present-day dealership are contemporary improvements that date to the 1970s and beyond, and have no direct relationship with the Toyota company's early presence at the Project Site.

In the broader context of commercial development in Hollywood, there is insufficient evidence demonstrating that there is anything about the site that would render it historically significant. A number of post-World War II commercial properties can be found along Hollywood Boulevard and other major commercial thoroughfares and, like the Project Site, most of these postwar commercial properties consist of simple, utilitarian buildings that reflect the gradual decline of Hollywood at this time. The Project Site is a representative—but not distinctive—example of commercial development from this era.

Based on the above, the Historical Resources Assessment concludes that the Project Site is not associated with events that have made a significant contribution to the broad patterns of national, state, or local history. Therefore, the Project Site does not satisfy National Register Criterion A/California Register Criterion 1/Local (HCM) Criterion 1.

Additionally, as detailed in the Historical Resources Assessment, there is insufficient evidence demonstrating that the Project Site is associated with the lives of historically significant individuals. For this reason, the Project Site does not satisfy National Register Criterion B/California Register Criterion 2/Local (HCM) Criterion 2.

With regard to National Register Criterion C/California Register Criterion 3/Local (HCM) Criterion 3, neither the showroom building nor any of its associated ancillary structures are notable for their method of construction. While the property exhibits characteristics of a post-World War II automobile dealership, a common commercial property type during this period, it is not rare, nor is there evidence indicating that it was a notable or influential example of a postwar car dealership. The Toyota of Hollywood dealership has some of the essential features that are characteristic of postwar car dealerships; however, it does not express the principles of postwar car dealerships in a particular compelling way. Compared against the broader pool of extant postwar car dealerships in Los Angeles, the existing dealership reads as a relatively modest and ubiquitous example of its respective type and period. Most improvements on the Project Site were designed by architect Leason Pomeroy III. Built in 1970, the showroom and various structures on the Project Site fit into Pomeroy's oeuvre of corporate commercial architecture. However, there is insufficient evidence that Pomeroy or his firm contributed to the architectural profession in a manner that would render him/them "masters" in the spirit of this criterion. There is also insufficient evidence that Snyder-Langston Inc.—contractor for the property—is a master. Based on the above, there is insufficient evidence demonstrating that the Project Site is significant for reasons relating to its architecture and physical design. Thus, the Project Site does not satisfy National Register Criterion C/California Register Criterion 3/Local (HCM) Criterion 3.

As further discussed in the Historical Resources Assessment, though it contains multiple buildings, structures, and site features, the Project Site occupies a singular site and does not meet the definition of a Historic Preservation Overlay Zone (HPOZ).

With regard to surrounding historical resources, the Historical Resources Assessment Report identified one (1) designated historical resource and three (3) eligible historical resources. The designated historical resource is individually listed in the California Register; the three eligible historical resources were all identified in the survey of the CRA-LA's Hollywood Redevelopment Project Area (2020).

The one designated historical resource is the Hawaii Theatre (now Salvation Army Tabernacle), a former theater building located at 5941 W. Hollywood Boulevard, across the street and slightly to the east of the Project Site. The resource was formally determined to be eligible for listing in the National Register in 1994 through the Section 106 process, and by virtue of this determination it was listed in the California Register with the California Historical Resource Status Code of 2S2. The three eligible historical resources include 1622 Gower Street (Celia Kreutzer Apartments), 5939 W. Hollywood Boulevard (Palms Grill), and 5951 W. Hollywood Boulevard (Florentine Gardens).

The Celia Kreutzer Apartments is a multi-family residential building located southwest of the Project Site. While this property is located on the same city block, it does not directly abut the boundaries of the Project Site. It was constructed in 1923 and designed by architect R.M. Schindler. The resource was identified in the 2020 CRA-LA historic resources survey as individually eligible for the California Register and for local designation, and was assigned the corresponding California Historical Resource Status Codes of 3CS and 5S3. The survey noted that the resource is "a rare remaining example of an intact 1920s multi-family residence in Hollywood," and a "significant example of Early Modern residential architecture in Hollywood [and the] work of master architect R.M. Schindler."

The Palms Grill (now Salvation Army Hollywood Weingart Youth Center) is a former restaurant building located across the street and to the east of the Project Site. It was built in 1936 and designed by architect Gordon Kaufmann. The resource was identified in the 2020 CRA-LA historic resources survey as individually eligible for the California Register and for local designation, and was assigned the corresponding California Historical Resource Status Codes of 3CS and 5S3. The survey noted that the resource is an "excellent example of Streamline Moderne commercial architecture in Hollywood [and the] work of noted Los Angeles architect Gordon Kaufmann."

Florentine Gardens is an event venue located across the street from the Project Site. It was constructed in 1938 and designed by architect Gordon Kaufmann. The resource was identified in the 2020 CRA-LA historic resources survey as individually eligible for the California Register and for local designation, and was assigned the corresponding California Historical Resource Status Codes of 3CS and 5S3. The survey noted that the resource is a "significant example of a commercial property associated with the entertainment industry. Between the 1930s and 1950s, Florentine Gardens was one of Hollywood's most popular dinner theaters and nightclubs known for its celebrity-studded lineups and risqué performances."

As previously described, the Project would be constructed within the boundaries of the Project Site, which does not include any historical resources and as such would not directly affect any onsite historical resources. In addition, as detailed above and in the Historical Resources Assessment, the historical resources located in the vicinity of the Project Site would retain their current status and would not be affected by the Project in a manner that would alter their significance and designation as historical resources. Therefore, the Project would not directly impact any historical resources located in the vicinity of the Project Site. Overall, the Project would not cause a substantial adverse change in the significance of a historical resource. Impacts would be less than significant, and no further evaluation is required in the EIR.

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

**Potentially Significant Impact.** CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within an urbanized area of the City and has been subject to grading, excavation and fill activities, and development in the past. Nevertheless, the Project would require grading and excavation for the construction of the proposed subterranean parking garage, which would extend to a

depth of approximately 30 to 40 feet below ground surface.<sup>32</sup> Since the Project would include excavation to previously undisturbed depths, there is potential for archaeological resources to be identified during construction activities associated with the Project. Therefore, further evaluation of the Project's potential to disturb previously undiscovered archaeological resources will be included in the EIR.

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

Less Than Significant Impact. The Project Site is located 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 the Project 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 Specifically, in accordance with CEQA Guidelines Section the remains are Native American. 15064.5(e), if the coroner determines the remains to be Native American, the coroner shall contact the Native American Heritage Commission who shall identify the most likely descendent. The most likely descendent may make recommendations regarding the treatment of the remains and any associated grave goods in accordance with PRC Section 5097.98. Therefore, due to the low potential that any human remains are located on the Project Site and because compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities, the Project's impact related to human remains would be less than significant, and no further evaluation of this topic in an EIR is required.

#### VI. ENERGY

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

<sup>32</sup> As previously noted, excavation associated with Building C would extend to 20-25 feet below ground surface.

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

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

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

**Potentially Significant Impact.** The Project involves the construction and operation of a new mixed-use development that would replace the existing automotive sale use within the Project Site. The Project would be subject to numerous state and local plans related to energy efficiency. The Project's potential impacts related to conflicts with applicable plans related to renewable energy or energy efficiency would be analyzed in the Draft EIR.

#### VII. GEOLOGY AND SOILS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VV	ould 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?			$\boxtimes$	
	iii. Seismic-related ground failure, including liquefaction?			$\boxtimes$	
	iv. Landslides?				$\boxtimes$
b.	Result in substantial soil erosion or the loss of topsoil?				

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

The following analysis is based on the Preliminary Geotechnical Report prepared for the Project by Langan Engineering and Environmental Services, Inc., dated May 2022. All specific information on geologic and soils conditions in the discussion below is from this report unless otherwise noted. The Preliminary Geotechnical Report is included as Appendix IS-3 of this Initial Study.

- a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

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

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

hazards from any potential surface ruptures. In addition, the City designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

According to the Preliminary Geotechnical Report and a review of the City's General Plan Safety Element, the Project Site is not within an Alquist-Priolo Earthquake Fault Zone or within a City-designated Fault Rupture Study Area, and no known active faults underlie the Project Site. Based on the Preliminary Geotechnical Report, the closest active fault to the Project Site is the Hollywood Fault, which is located approximately 0.1 mile northwest of the Project Site. As such, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone as mapped by CGS or within a Preliminary Fault Rupture Study Area as designated by the City. In addition, as discussed in the Preliminary Geotechnical Report, based on a geologic review of the Project Site, there is no indication of the presence of active surface faulting within the Project Site. Furthermore, while the Project would involve excavation for the subterranean parking levels, the proposed development would not involve mining operations or deep excavation into the earth, which could create unstable seismic conditions or stresses in the Earth's crust. Therefore, the Project's impacts associated with surface rupture from a known earthquake fault would be less than significant, and no further evaluation of this topic in an EIR is required.

#### ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. As previously stated, the Project is not located in an Alquist-Priolo Earthquake Fault Zone; the closest fault zone is associated with the Hollywood Fault located approximately 0.1 mile northwest of the Project Site. As noted in the Preliminary Geotechnical Report, the northern limits of the Project Site are just outside of the southern limits of the Hollywood Earthquake Fault Zone and a surface trace is mapped approximately 600 feet northwest of the Project Site, at its closest approach. As discussed in the Preliminary Geotechnical Report, ground shaking is addressed by proper engineering design and construction in conformance with current building codes and engineering practices. Specifically, state and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. The Project would comply with the Los Angeles Building Code, which incorporates current seismic design provisions of the California Building Code with City amendments. The California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of the labs, including the recommendations provided in a comprehensive design level geotechnical investigation for the Project to be approved by LADBS. Therefore, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

#### iii. Seismic-related ground failure, including liquefaction?

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

According to the Preliminary Geotechnical Report and based on the EZRIM for the Hollywood Quadrangle (CGS, 2014) and City of Los Angeles ZIMAS, the Project Site is not located within a state designated liquefaction hazard zone. Therefore, impacts related to liquefaction would be less than significant, and no further evaluation of this topic in an EIR is required.

#### iv. Landslides?

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

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

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

<sup>33</sup> Ibid.

<sup>&</sup>lt;sup>34</sup> City of Los Angeles, 2018 Local Hazard Mitigation Plan, Central APC, Figure 11-6, Landslide Susceptibility Zones, p. 246.

City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5545-006-029; 005-005; 005-022, http://zimas.lacity.org/, accessed April 4, 2023.

compliance with applicable regulatory requirements, the Project's potential impacts due to soil erosion or the loss of topsoil would be less than significant, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed above, the Project Site is not located near mountains or other geologic features that would result in on- or off-site landslides. While there is a grade change across the Project Site extending from Hollywood Boulevard to Carlton Way, 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. Therefore, no impacts related to landslides would occur.

Liquefaction-related effects include lateral spreading. As evaluated in the Preliminary Geotechnical Report and discussed above, the Project Site is not susceptible to liquefaction and would not potentially result in lateral spreading. Impacts related to liquefaction and lateral spreading would be less than significant.

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. As discussed in the Preliminary Geotechnical Report, the Project Site is not mapped within any oil field boundaries. The nearest plugged oil well is located approximately 2,600 feet southwest of the Project Site.<sup>36</sup> Additionally, no large scale extraction of groundwater, gas, oil or geothermal energy is planned at the Project Site or in the general vicinity of the Project Site. Therefore, since there is no local or gas extraction currently occurring or planned as part of the Project, there is no potential for ground subsidence due to withdrawal of fluid or gas at the Project Site. Thus, no impacts related to subsidence would occur.

Collapsible soils consist primarily of sand- and silt-sized particles arranged in a loose structure held together by water-soluble cementing agents. In a dry state, the cementing agents lead to a strong soil with relatively low compressibility. However, upon wetting and softening of the cementing agents, the loose soil structure can collapse and the soil would become weaker and more compressible. As discussed in the Preliminary Geotechnical Report, the alluvial soils, soils that are not primarily sand, encountered in the borings drilled at the site were stiff and/or dense, did not contain water soluble elements, and would not be susceptible to collapse. Therefore, impacts associated with collapsible soils would be less than significant.

Based on the above, the Project would not cause a geologic unit or soil to become unstable. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

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

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Langan Engineering and Environmental Services, Inc., Preliminary Geotechnical Report for Hollywood Toyota Site, May 17, 2022, included as Appendix IS-3 of this Initial Study.

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clavey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. Due to high clay content, expansive soils expand with the addition of water and shrink when dried, which can cause damage to overlying structures. According to the Preliminary Geotechnical Report, the on-site geological materials are in the low to medium expansive potential range. Project design and construction would comply with all applicable requirements of the LADBS for a site with underlying expansive soils. Such requirements may include excavation and replacement of upper soils (for any expansive soils at the street level), deepening of foundations, cement treatment, and/or moisture conditioning of the upper soils. As described in Section 3, Project Description, of this Initial Study, the Project would include grading and excavation for the subterranean parking, which would extend to a depth of 30 to 40 feet below ground surface, except for the construction of Building C within the Carlton Lot which would require excavation to a depth of 20 feet to 25 feet. As such, soils underlying the Project Site would be removed to at least a minimum of 20 feet below ground surface. The Project would also incorporate ground improvements within the Carlton Lot to reduce settlement and impacts associated with expansive soils. In addition, other specific requirements would be determined as part of review and approval of the site-specific design-level geotechnical investigation by LADBS. Thus, through removal of existing underlying soils as well as compliance with regulatory requirements, potential impacts associated with expansive soils would be less than significant. No further evaluation of this topic in an EIR is required.

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

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

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

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

### VIII. GREENHOUSE GAS EMISSIONS

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact			
Wo	ould 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?							
<b>Potentially Significant Impact.</b> Gases that trap heat in the atmosphere are called greenhouse gases (GHGs) since they have effects that are analogous to the way in which a greenhouse retains heat. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of greenhouse gases in the atmosphere affects the earth's temperature. The State of California has undertaken initiatives designed to address the effects of GHG emissions, and to establish targets and emission reduction strategies for greenhouse gas emissions in California. Activities associated with the Project, including construction and operational activities, could result in GHG emissions that may have a significant impact on the environment. Therefore, further evaluation of the Project's GHG emissions will be provided in the EIR.								
	Would the project conflict with an applicable plant plant is properly as a second conflict with an applicable plant plant is a second conflict with an applicable plant plant is a second conflict with an applicable plant plant is a second conflict with an applicable plant plant is a second conflict with an applicable plant plant is a second conflict with an applicable plant plant plant plant plant is a second conflict with an applicable plant plan		or regulati	on adopte	d for the			
<b>Potentially Significant Impact.</b> The Project would have the potential to emit GHGs. Therefore, further evaluation of Project-related emissions and associated emission reduction strategies to determine whether the Project conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs will be included in an EIR.								
IX	. HAZARDS AND HAZARDOUS MATE	RIALS						
		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact			
Wo	ould the project:							
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?							

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

a. Would this 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 types and amounts of hazardous materials potentially used in connection with the construction and operation of the Project are anticipated to be typical of those used for construction of residential and commercial uses, including vehicle sales. Specifically, Project operations would likely involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and petroleum products. Project construction and operation also would involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. Accordingly, further analysis of these potential impacts will be provided in the EIR.

b. Would this 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.** The Project Site is currently occupied by Toyota of Hollywood and associated buildings and parking areas. Based on the age of the existing structures and the previous uses, asbestos containing materials (ACM) and/or lead-based paints (LBP) and other recognized environmental conditions may be present on site. Therefore, further evaluation will be included in the EIR to determine the Project's potential impacts with respect to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

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

Less Than Significant Impact. The nearest Los Angeles Unified School District (LAUSD) schools located in the vicinity of the Project Site include Joseph Le Conte Middle School (approximately 0.5 mile south of Project Site): Hollywood Senior High School (approximately 1.7 miles west of Project Site); and Grant Elementary (approximately 0.45 mile northeast of Project Site). As discussed under Threshold (a), Project operations would likely involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and petroleum products. Project construction and operation also would involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. As discussed under Threshold (b), based on the age of the existing structures and previous uses of the Project Site, asbestos containing materials (ACM) and/or lead-based paints (LBP) and other recognized environmental conditions may be present on site. As such, this would potentially result in the release of hazardous materials into the environment and would require the appropriate handling and disposal of such hazardous materials per applicable regulations. However, the Project is not expected to involve hazardous emissions or require the handling of acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. In addition, the Project Site is not located within one-quarter mile of an existing or proposed school. As such, impacts would be less than significant, and no further evaluation of this topic will be included in the EIR.

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

**Potentially Significant Impact.** The Project Site may appear on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. In addition, properties in the surrounding area have the potential to be listed on various environmental databases. Therefore, further evaluation of this issue will be included in the EIR.

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

**No Impact.** The Project Site is not located within 2 miles of an airport or within an airport planning area. The closest airport is the Bob Hope Airport, which is approximately 7.9 miles north of the Project Site. Given the distance between the Project Site and this airport, the Project would not have the potential to result in a safety hazard or excessive noise for people residing or working near an airport. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in the EIR is required.

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

Less Than Significant Impact. According to the City General Plan Safety Element, California Government Code Section 65302(q)(1) specifies the need to plan for swift evacuation in the event of a fire or other emergency. In response, the City includes a wide range of physical environments and dramatic differences in population density based on the time of day or day of the week. To better accommodate the variety of evacuation scenarios, the City has developed a dynamic approach to evacuation response, one that can respond to different conditions. As specified in the City EOP Evacuations Annex "primary evacuation routes consist of the major interstates, highways, and primary arterials within the City and Los Angeles County." However, in response to a more localized emergency, such as a hillside wildfire, the LAFD works in coordination with the Los Angeles Department of Transportation and Los Angeles Police Department to identify the most appropriate local egress option and direct individuals to those routes. Other routes are shared in real time depending on which disaster and suitable evacuation routes are identified.<sup>37</sup> While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, both directions of travel would continue to be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area as set forth in California Vehicle Code (CVC) 21806(a)(1). In addition, the Project would comply with Los Angeles Fire Department (LAFD) access requirements and applicable LAFD regulations regarding safety. Therefore, with compliance with applicable regulatory requirements, the Project would not impede emergency access within the Project Site or vicinity that could cause an impediment along City designated disaster routes such that the Project would impair the implementation of the City's emergency response plan. As such, the Project's impact related to the implementation of the City's emergency response plan would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

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

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

City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5545-006-029; 005-005; 005-022, http://zimas.lacity.org/, accessed April 4, 2023.

<sup>&</sup>lt;sup>39</sup> City of Los Angeles, 2018 Local Hazard Mitigation Plan, Central APC, Figure 13-2., Wildfire Severity Zones, p. 277.

#### X. HYDROLOGY AND WATER QUALITY

		Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Wo	ould the project:				
a.	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?				
b.	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				
C.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
	<ul> <li>Result in substantial erosion or siltation on- or off-site;</li> </ul>				
	<ul> <li>Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;</li> </ul>				
	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?				$\boxtimes$
d.	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				
e.	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				

The following analysis is based on the Hydrology and Water Resources Technical Report prepared for the Project by KPFF Consulting Engineers, dated May 2023. The Hydrology and Water Resources Technical Report is included as Appendix IS-4 of this Initial Study.

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

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

#### **Surface Water Quality**

#### Construction

As discussed in the Hydrology and Water Resources Technical Report, construction activities for the Project could cause exposed and stockpiled soils to 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 the construction area would be greater than one acre, the Project would be required to obtain coverage under the NPDES General Construction stormwater permit. In accordance with the requirements of this permit, the Project would implement a site-specific Stormwater Pollution Prevention Plan (SWPPP) adhering to the California Stormwater Quality Association Best Management Practices (BMP) Handbook. The SWPPP would set forth BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC) that require necessary measures, plans, and inspections to reduce sedimentation and erosion.

With the implementation of regulatory compliance requirements, including site-specific BMPs set forth in the SWPPP required to comply with NPDES program requirements under federal and state law and City grading permit regulations, the Project would reduce or eliminate the discharge of potential pollutants from stormwater runoff during construction. Therefore, with compliance with NPDES requirements and City grading regulations, construction of the Project would not result in discharge that would violate any water quality standard or waste discharge requirements or otherwise substantially degrade surface water quality. Thus, temporary construction-related impacts on surface water quality would be less than significant, and no further evaluation of this topic in the EIR is required.

#### Operation

As discussed in the Hydrology and Water Resources Technical Report, the Project Site is located within the Ballona Creek Watershed in the Los Angeles Basin. The Ballona Creek Watershed encompasses an area of approximately 130 square miles extending from the Santa Monica Mountains and the Ventura-Los Angeles County line on the north, to the Harbor Freeway (11) on the east, Santa Monica to the west, and to the Baldwin Hills on the south. Ballona Creek is a 9-mile long flood protection channel that drains the Ballona Creek Watershed to the Pacific Ocean. The major tributary areas to the Ballona Creek include Centinela Creek, Sepulveda Canyon Channel, Benedict Canyon Channel, and numerous storm drains. Constituents of concern listed for the Ballona under California's Clean Water Act Section 303(d) List include Indicator Bacteria, Copper, Cyanide, Lead, Toxicity, Trash, Viruses (Enteric), and Zinc. Construction of the Project would not increase concentrations of the items listed as constituents of concern for the Ballona Creek Watershed.

As is typical of most urban developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. Under

Section 3.1.3 of the LID manual, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs onsite for the volume of water produced by the 85th percentile storm event. The Project would incorporate appropriate LID BMPs in accordance with the City's LID Ordinance intended to control and treat stormwater runoff in compliance with LID. As stated in the Hydrology and Water Resources Technical Report, it appears that the Project Site currently discharges without any means of treatment. As such, implementation of LID BMPs as part of the Project would improve existing site conditions. As such, with the implementation of LID BMPs in compliance with the City's LID Ordinance and LID Manual, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. Impacts to surface water quality during operation of the Project would be less than significant, and no further evaluation of this topic in an EIR is required.

#### **Groundwater Quality**

#### Construction

As discussed in the Hydrology and Water Resources Technical Report, groundwater was encountered at depths of 82 and 89 feet below ground surface. In addition, the historic high groundwater in the vicinity of the Project Site is 80 feet below ground surface. Construction activities for the Project would include excavations approximately 30 to 40 feet below ground surface for the proposed subterranean parking garage. As the Project's proposed excavation would not be deeper than the historic high groundwater elevation, temporary dewatering is not expected during construction. If groundwater is encountered during construction, temporary pumps and filtration would be used in compliance with all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations.

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would therefore require proper management and disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials released into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste, would reduce the potential for the construction of the Project to release contaminants that could percolate inro groundwater. In addition, as there are no groundwater production wells or public water supply wells within one mile of the Project Site, construction activities would not be anticipated to affect existing wells. Based on the above, construction of the Project would not result in discharges that would violate any water quality standard or waste discharge requirement associated with groundwater protection. Therefore, construction-related impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

#### Operation

Operational activities which could affect groundwater quality include hazardous material spills and leaking underground storage tanks. As discussed in the Phase I ESA, no underground storage tanks are known to be currently operated or will be operated by the Project. Compliance with all applicable existing regulations at the Project Site regarding the handling and potentially required cleanup of

<sup>40</sup> As previously noted, excavation associated with Building C would extend to 20-25 feet below ground surface.

hazardous materials would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Furthermore, as discussed in the Hydrology and Water Resources Technical Report, operation of the Project would not require extraction from the groundwater supply based on the depth of excavation for the proposed uses and depth of groundwater below the Project Site. Additionally, the Project does not involve drilling to or through a clean or contaminated aquifer. Therefore, Project operations would not result in violations of any water quality standards or waste discharge requirements or otherwise substantially degrade groundwater quality. The Project's potential impact on groundwater quality operation would be less than significant, and no further evaluation of this topic in an EIR is required.

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

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

#### Construction

As described above, there are no groundwater wells located in the vicinity of the Project Site. As described in Section 3. Project Description, of this Initial Study, the Project would involve excavations approximately 30 to 40 feet below ground surface for the proposed subterranean parking garage.41 As provided in the Geotechnical Report and the Hydrology and Water Resources Technical Report included as Appendix IS-3 and Appendix IS-4 of this Initial Study, historic high groundwater levels in the vicinity of the Project Site are approximately 80 feet below ground surface. groundwater was encountered at depths of 82 and 89 feet below ground surface. As the Project's proposed excavation would not be deeper than the historic high groundwater elevation, temporary dewatering is not expected during construction. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations. Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts on groundwater supplies during construction would be less than significant, and no further evaluation of this topic in the EIR is required.

#### Operation

As discussed in the Hydrology and Water Resources Technical Report, the Project Site is approximately 100 percent impervious. With implementation of the Project, the Project Site is expected to maintain the overall percentage of impervious area from the current condition of the Project Site. As such, the potential for groundwater recharge during Project operations would remain

<sup>&</sup>lt;sup>41</sup> As previously noted, excavation associated with Building C would extend to 20-25 feet below ground surface.

minimal. Furthermore, the Project's BMPs would control stormwater runoff with no increase in runoff resulting from the Project. 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, Project operations would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts on groundwater supplies during construction would be less than significant, and no further evaluation of this topic in the EIR is required.

- c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
  - i. Result in substantial erosion or siltation on- or off-site;

**Less Than Significant Impact.** As provided by the following analysis, the Project would not substantially alter the existing drainage pattern of the Project Site or area in a manner that would result in substantial erosion or siltation on- or off-site.

#### Construction

The Project Site is not crossed by any water courses or rivers. Construction of the Project would involve the demolition of the existing structures and surface parking areas followed by grading and excavation for the subterranean parking. These activities have the potential to temporarily alter existing drainage patterns and flows of the Project Site by exposing 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 nutrient loading in runoff. However, as discussed above, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. These BMPs would be designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. 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 General Construction Permit requirements, implementation of BMPs, and compliance with applicable City grading regulations, construction of the Project would not substantially alter the Project Site's drainage patterns in a manner that would result in substantial erosion on- or off-site. As such, construction-related impacts to erosion and siltation would be less than significant, and no further evaluation of this topic in an EIR is required.

#### Operation

As previously discussed, the Project Site is currently approximately 100 percent impervious. With implementation of the Project, the Project Site would maintain the overall percentage of impervious area. Accordingly, similar to existing conditions, there would be a limited potential for erosion or siltation to occur from the exposed soils or large expanses of impervious areas. Therefore, the Project would not substantially alter the Project Site's drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. Operational impacts to erosion and siltation would be less than significant, and no further evaluation of this topic in an EIR is required.

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

**Less Than Significant Impact.** As provided by the following analysis, the Project would not substantially alter the existing drainage pattern of the Project Site or area in a manner that would substantially increase the rate or amount of surface runoff and result in flooding on- or off-site.

#### Construction

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

#### Operation

As previously discussed, with implementation of the Project, the Project Site would maintain the overall percentage of impervious area (approximately 100 percent). In addition, the Project would comply with the City's LID Ordinance, which requires that post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on site for the volume of water produced by the greater of the 85th percentile storm evet or the 0.75-inch storm event (i.e. "first flush"). Consistent with LID requirements to reduce the quantity and improve the quality of rainfall that leaves the Project Site, the Project proposes to include infiltration as established by the LID manual. Therefore, with implementation of BMPs the Project would not increase the rate of or amount of surface runoff in a manner which would result in flooding on- or off-site. Operational impacts associated with flooding from surface runoff would be less than significant, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As detailed in the Hydrology and Water Resources Technical Report, a comparison of the pre- and post-Project peak flow rates indicates a decrease in stormwater runoff from the Project Site from 10.44 cubic feet per second under existing conditions to 9.69 cubic feet per second with the implementation of the Project. In addition, the Project Site currently does not have BMPs for the management of pollutants or runoff. The BMPs implemented as part of the Project would control stormwater runoff and ultimately reduce or eliminate the discharge of potential pollutants from stormwater runoff. Furthermore, the Project would not cause flooding during a 50-year

storm event or result in a permanent adverse change to the movement of surface water on the Project Site. Therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial sources of polluted runoff. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

#### iv. Impede or redirect flood flows?

**No Impact.** The Project is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City.<sup>42,43</sup> Thus, the Project would not impede or redirect flood flows. No impacts would occur, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

Less Than Significant Impact. 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. 44,45 In addition, the Safety Element of the City's General Plan does not map the Project Site as being located within a flood control basin or within a potential inundation area. In addition, given its distance of the Project Site from the Pacific Ocean, the Safety Element of the City of Los Angeles does not map the Project Site as being located within a tsunami hazard area. Therefore, no tsunami or tsunami events would be expected to impact the Project Ste. Additionally, there are no standing bodies of water near the Project Site that may experience a seiche.

Earthquake-induced flooding can result from the failure of dams or other water-retaining structures resulting from earthquakes. According to the General Plan's Safety Element, the Project Site is not located within a flood impact zone.<sup>47</sup> However, the Project Site is mapped within an inundation area for the Hollywood Reservoir, which is held by the Mulholland Dam.<sup>48</sup> The Mulholland Dam is a LADWP dam located in the Hollywood Hills. The Mulholland Dam was built in 1924 and designed to hold 2.5 billion gallons of water. Dam safety regulations are the primary means of reducing damage or injury due to inundation occurring from dam failure. The California Division of Safety of Dams regulates the siting, design, construction, and periodic review of all dams in the State. In addition, LADWP operates the dams and mitigates the potential for overflow and seiche hazard through control of water levels and dam wall height. These measures include seismic retrofits and other related dam improvements completed under the requirements of the 1972 State Dam Safety Act. In addition, the

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Federal Emergency Management Agency, Flood Insurance Rate Map, Panel Number 06037C1605F, effective on September 26, 2008.

City of Los Angeles, 2018 Local Hazard Mitigation Plan, Central APC, Figure 10-9., FEMA DFIRM Flood Hazard Areas, p. 230.

Federal Emergency Management Agency, Flood Insurance Rate Map, Panel Number 06037C1605F, effective on September 26, 2008.

<sup>&</sup>lt;sup>45</sup> City of Los Angeles, 2018 Local Hazard Mitigation Plan, Central APC, Figure 10-9., FEMA DFIRM Flood Hazard Areas, p. 230.

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

<sup>&</sup>lt;sup>47</sup> Los Angeles General Plan Safety Element, November 1996, Exhibit G, Inundation & Tsunami Hazard Areas, p. 59.

<sup>48</sup> Los Angeles General Plan Safety Element, November 1996, Exhibit G, Inundation & Tsunami Hazard Areas, p. 59.

City's Local Hazard Mitigation Plan, which was adopted in January 2018, provides a list of existing programs, proposed activities and specific projects that may assist the City of Los Angeles in reducing risk and preventing loss of life and property damage from natural and human-caused hazards, including dam failure. The Hazard Mitigation Plan evaluation of dam failure vulnerability classifies dam failure as a moderate risk rating.

Considering the above information and risk reduction projects, the risk of flooding from a tsunami, inundation by a seiche or dam failure is considered low. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As previously discussed, the Project Site is located within and drains into 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 & sediment), coliform bacteria, copper (dissolved), cyanide, DDT, lead, PAHs, PCBs, selenium, sediment toxicity, Shellfish Harvesting Advisory, silver, toxicity, trash, viruses (Enteric), and zinc. As discussed in the Hydrology and Water Resources Technical Report, operation of the Project would not be anticipated to increase concentrations of these constituents of concern for the Ballona Creek Watershed. Project operation would introduce sources of potential water pollution that are typical of urban development (e.g., sediment, nutrients, pesticides, metals, pathogens, and oil and grease). The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. As such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans for the Ballona Creek Watershed. Additionally, during construction, the Project would be required to implement a SWPPP under the NPDES Construction General Permit that would set forth BMPs for stormwater and nonstormwater discharges to minimize the discharge of pollutants in stormwater runoff during construction.

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

#### XI. LAND USE AND PLANNING

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
W	ould the project:				
a.	Physically divide an established community?				

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

#### a. Would the project physically divide an established community?

Less than Significant Impact. The Project Site is located within the highly urbanized Hollywood Community Plan area and is currently occupied by Toyota of Hollywood. The area surrounding the Project Site is highly urbanized and includes a mix of low- to mid-rise buildings containing a variety of uses. Land uses immediately surrounding the Project Site include a hotel to the east; surface parking and commercial uses to the east; residential and commercial uses to the south; and commercial uses to the north. On the northeast side of the Project Site is a two-story strip mall. A one-story apartment building resides directly east of the Project Site. The Project proposes the development of new residential uses, commercial office uses, and retail uses. These uses would be consistent with other developments located adjacent to and in the general vicinity of the Project Site. Additionally, all proposed development would occur within the boundaries of the Project Site and would not include the closure of any surrounding travel routes. Furthermore, the Project does not propose a freeway or other large infrastructure that could divide the existing surrounding community. surrounding properties would continue to be available upon buildout of the Project. Therefore, the Project would not physically divide an established community. Impacts related to the physical division of an established community would be less than significant, and no further evaluation of this topic in an EIR is required.

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

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

#### XII. MINERAL RESOURCES

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

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

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

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

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

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

<sup>50</sup> State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2018.

<sup>&</sup>lt;sup>51</sup> City of Los Angeles Department of Public Works, Bureau of Engineering, NavigateLA, http://navigatela.lacity.org/navigatela, accessed January 17, 2023..

#### XIII. NOISE

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

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

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

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

**Potentially Significant Impact.** Construction of the Project could generate ground borne 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 ground borne vibration and noise levels. Therefore, further evaluation of this topic will be provided in the EIR.

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

**No Impact.** The Project Site is not located within the vicinity of a private airstrip or airport land use plan. The closest private airstrip or airport is Bob Hope Airport, which is located approximately 7.9 miles north of the Project Site. Given the distance between the Project Site and the nearest airport, the Project would not expose people residing or working in the Project area to excessive noise levels. Therefore, no impact would occur, and no mitigation measures are required. No further evaluation of this topic is required.

#### XIV. POPULATION AND HOUSING

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

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

**Less Than Significant Impact.** The Project proposes the demolition of existing improvements; replacing them with 350 residential units, 136,000 square feet of commercial office uses, and 22,542 square feet of retail uses, including 18,004 square feet of retail, 4,038 square feet for dining, and 500 square feet of support uses. Since the Project proposes the development of new residential uses, it would induce a new residential population that could contribute to population growth in the vicinity of the Project Site.

With regard to future growth, SCAG has prepared the 2020-2045 RTP/SCS, which provides population, housing, and employment projections for cities under its jurisdiction through 2045. According to the 2020-2045 RTP/SCS, the forecasted population for the City of Los Angeles in 2023 is approximately 4,135,955 persons. In 2029, the projected buildout year of the Project, the City of Los Angeles is anticipated to have a population of approximately 4,309,231. Therefore, the projected population growth between 2023 and 2029 is approximately 173,276 persons.<sup>52</sup> Applying the factor for residential uses included in the City's VMT Calculator Documentation of 2.25 residents per unit,

SCAG. 2020-2045 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, p. 35. Based on a linear interpolation of SCAG's population data for 2016 (3,933,800) and 2045 (4,771,300). The 2023 value is extrapolated from 2016 and 2045 values:  $[(4,771,300-3,933,800) \div 29) * 7] + 3,933,800 = ~ 4,135955$ . The 2029 value is extrapolated from 2016 and 2045 values:  $[(4,771,300-3,933,800) \div 29) * 13] + 3,933,800 = ~ 4,309,231$ . The projected population growth between 2023 and 2029 is approximately 173,276 (4,309,231 – 4,135,955 = 173,276).

the development of 306 residential units would result in the increase of approximately 689 residents.<sup>53</sup> In addition, applying the City's VMT Calculator Documentation factor for affordable housing of 3.14 persons per unit for the Project's 44 affordable housing units would result in the increase of approximately 138 persons.<sup>54</sup> Therefore, the Project would result in a net residential population of 827.<sup>55</sup> The estimated 827 residents generated by the Project would represent approximately 0.48 percent of the population growth forecasted by SCAG in the City of Los Angeles between 2023 and 2029.<sup>56</sup> Furthermore, the Project does not include the extension of roads or other infrastructure that would indirectly induce substantial population growth in the area. Therefore, the Project's residents would be within SCAG's population projection for the City of Los Angeles Subregion.

According to the 2020-2045 RTP/SCS, the forecasted number of households for the City of Los Angeles in 2023 is approximately 1,469,828 households. In 2029, the projected occupancy year of the Project, the City of Los Angeles is anticipated to have approximately 1,557,966 households. Therefore, the projected household growth in the City between 2023 and 2029 is approximately 88,138 households. The Project would add a total of 350 residential units. No existing residential units are located on the Project Site. Therefore, the Project's 350 residential units would constitute approximately 0.4 percent of the housing growth forecasted between 2023 and 2029. Therefore, the Project's housing units would be within SCAG's housing projection for the City of Los Angeles.

Based on employee generation factors from the City of Los Angeles Department of Transportation (LADOT)'s Vehicle Miles Traveled Calculator, the Project is estimated to generate 532 net new employees to the Project Site. <sup>57,58</sup> According to SCAG's 2020-2045 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2023 is approximately 1,917,721 employees. <sup>59</sup> In 2029, the projected buildout year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,977,224 employees. <sup>60</sup> Therefore, the projected employment growth in the City

LADOT and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. The existing commercial uses to be removed produce approximately 64 employees (commercial 31,833 square feet \* 0.002). The Project would produce 600 employees (office 136,000 square feet \* 0.004 = 544) + (retail 18,004 square feet \* 0.002 = 36) + (restaurant 4,038 square feet \* 0.004 = 16). Therefore, the Project would produce approximately 532 net new employees.

LADOT and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. The Multi-Family Residential factor of 2.25 persons per unit is applied to the 306 market-rate units (306 \* 2.25 = 689 persons).

LADOT and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. The Affordable Housing - Family Residential factor of 3.14 persons per unit is applied to the 44 affordable housing units (44 \* 3.14 = 138 persons).

Accounting for both market-rate and affordable housing units, the Project would produce an estimated total of 827 persons (689 + 138 = 827).

 $<sup>827 \</sup>div 173,276 = 0.0047$ 

<sup>&</sup>lt;sup>58</sup> The existing occupied uses to be removed include commercial uses, including Toyota of Hollywood as well as low rise buildings and parking areas.

SCAG. 2020-2045 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, p. 35. Based on a linear interpolation of SCAG's employment data for 2016 (1,848,300) and 2045 (2,135,900). The 2023 value is extrapolated from 2016 and 2045 values:  $[(2,135,900-1,848,300) \div 29) * 7] + 1,848,300 = ~ 1,917,721$ .

SCAG. 2020-2045 RTP/SCS, Demographics and Growth Forecast Appendix, Table 14, p. 35. Based on a linear interpolation of SCAG's employment data for 2016 (1,848,300) and 2045 (2,135,900). The 2029 value is extrapolated from 2016 and 2045 values:  $[(2,135,900-1,848,300) \div 29) * 13] + 1,848,300 = ~ 1,977,224$ .

between 2023 and 2029 based on SCAG's 2020–2045 RTP/SCS is approximately 59,504 employees. Thus, the Project's estimated 532 net new employees would constitute 0.9 percent of the employment growth forecasted between 2023 and 2029. Therefore, the Project would not cause an exceedance of SCAG's employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities.

As analyzed above, the net new population and housing that would be generated by the Project would be within SCAG's population and housing projections for the City of Los Angeles Subregion. Therefore, the Project would not induce substantial population or housing growth. Impacts related to population and housing would be less than significant, and no mitigation measures would be required. No further analysis of this topic in the EIR is required.

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

**No Impact.** As described in Section 3, Project Description, of this Initial Study, the Project Site is currently developed as an automotive dealership for Toyota and includes a showroom, parts storage structure, auto repair facility with five service bays, and surface parking. No housing currently exists on the Project Site. Accordingly, the Project would not displace any existing persons or housing, or require the construction of replacement housing elsewhere. Therefore, the Project would not create any impacts related to displacement of people or housing, and no further evaluation of this topic in an EIR is required.

#### XV. PUBLIC SERVICES

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

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

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 would cause significant

environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?

**Potentially Significant Impact.** LAFD provides fire protection and emergency medical services for the Project Site. The Project would increase the floor area and associated occupancy on-site which could result in the need for additional fire protection services during Project operation. Therefore, further evaluation of this topic in an EIR is required.

b. 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 would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?

**Potentially Significant Impact.** Police protection for the Project Site is provided by the City of Los Angeles Police Department (LAPD). The Project would increase the floor area and associated occupancy on-site which could result in the need for additional police services during Project operation. Therefore, further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). LAUSD is divided into six local districts.<sup>61</sup> The Project Site is located in Local District-West.<sup>62</sup> The Project Site is currently served by one elementary school (Grant Elementary), one middle school (Joseph Le Conte Middle School), and one high school (Hollywood Senior High School).63 As previously discussed, the Project includes the construction of 350 Based on LAUSD Student Generation Rates, the Project would generate approximately 252 new students consisting of 138 elementary school students, 38 middle school students, and 76 high school students.<sup>64</sup> As discussed in Section 3, Project Description, of this Initial Study, the Project would replace the approximately 31,833-square-foot existing automotive dealership and surface parking on the Project Site. Using the applicable LAUSD student generation rates, the existing uses to be removed would generate approximately nine students consisting of five elementary school students, one middle school student, and three high school students. Thus, when accounting for the removal of the existing uses, the Project would result in a net increase of 243 students consisting of 133 elementary school students, 37 middle school students, and 76 high school students.65 However, it should be noted that the number of Project-generated students who could

<sup>&</sup>lt;sup>61</sup> LAUSD, Board of Education Districts Maps 2015–2016, June 2015.

<sup>62</sup> LAUSD, Board of Education Local District—West Map, July 2015.

<sup>&</sup>lt;sup>63</sup> Los Angeles Unified School District, Residential School Identifier, http://rsi.lausd.net/ResidentSchoolIdentifier/, accessed February 7, 2023.

<sup>64</sup> Los Angeles Unified School District, 2020 Developer Fee Justification Study, March 2020, Table 3.

<sup>&</sup>lt;sup>65</sup> Los Angeles Unified School District, 2020 Developer Fee Justification Study, March 2020, Table 3.

attend LAUSD schools serving the Project Site would likely be less than the estimate presented because this estimate does not account for students who may enroll in private schools or participate in home-schooling. In addition, the estimated total number of students that may be generated by the Project does not account for surrounding residents who may already reside in the school attendance boundaries of the Project Site and would move to the Project Site. Other LAUSD options that are not accounted for that may be available to Project-generated students and which would reduce the demand on the schools serving the Project Site include the following:

- Open enrollment that enables students anywhere within the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats;
- Magnet schools and centers, which are open to qualified students in the LAUSD;
- The Permits With Transportation Program, which allows students to continue to go to the schools within the same feeder pattern of the school they were enrolled in from elementary through high school. The LAUSD provides transportation to all students enrolled in the Permits With Transportation Program regardless of where they live within the LAUSD;
- Intra-district parent employment-related transfer permits that allow students to enroll in a school that serves the attendance area where the student's parent is regularly employed if there is adequate capacity available at the school;
- Sibling permits that enable students to enroll in a school where a sibling is already enrolled; and
- Child care permits that allow students to enroll in a school that serves the attendance area
  where a younger sibling is cared for every day after school hours by a known child care
  agency, private organization, or a verifiable child care provider.

Additionally, pursuant to Senate Bill 50, the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of the Project's building permit. LAUSD collects development fees for new construction within its district boundaries. Pursuant to Government Code Section 65995, the payment of these fees fully addresses Project-related school impacts. Thus, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (i.e., schools), need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools. Therefore, with payment of the applicable development school fees to the LAUSD, the Project's impact on schools would be less than significant, and no mitigation measures are required. No further evaluation of this issue in an EIR is required.

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

**Less Than Significant Impact.** Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. Nearby

public parks and recreational facilities within an approximate 2-mile radius include Carlton Way Park (0.12 mile south); Seily Rodriguez Park (0.69 mile south); Selma Park (0.70 mile west); Yucca Park and Yucca Community Center (0.86 mile west); De Longpre Park (0.91 mile southwest); La Mirada Park (0.93 mile southeast); Barnsdall Art Park (1.52 miles east); Runyon Canyon Park (1.64 miles northwest); and Burns (Robert L) Park (1.80 miles south).

#### Construction

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

#### Operation

An increase in the use of existing parks and recreational facilities is directly associated with an increase in population. As previously discussed, the Project includes the construction of 350 residential units. Based on generation factors from the City of Los Angeles Department of Transportation (LADOT)'s Vehicle Miles Traveled Calculator, the Project's new residential units would generate approximately 827 residents.<sup>66</sup>

As discussed in Section 3, Project Description, of this Initial Study, the Project would provide common open space at the ground level that could be publicly accessible during daytime hours in the form of gardens, courtyards, and terraces. The publicly accessible open space proposed to be provided within the Project Site would total 23,526 square feet. In addition, the Project would include 19,076 square feet of private open space. As illustrated in Figure 9 in Section 3, Project Description, of this Initial Study, the primary public open space amenity would be a landscaped and paved central plaza along Hollywood Boulevard, which would include access to retail, outdoor dining, and terrace stairs that provide additional gathering space as well as access to a landscaped upper plaza and residential garden walk. Interior common areas would include resident amenities such as a pool deck, view deck, fitness areas, game rooms, lounges and meeting rooms. Additional common area opens

<sup>66</sup> Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1.

spaces would be provided in gardens and terraces throughout the Project Site. Many of the residential structures would also include roof top open spaces.

Due to the amount, variety, and availability of the proposed open space and recreational amenities, it is anticipated that Project residents would generally utilize on-site open space to meet their recreational needs. Thus, while the Project's residents would be expected to utilize off-site public parks and recreational facilities to some degree, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Similarly, while the Project's commercial component would result in a demand for parks and recreational facilities, the Project also includes publicly accessible open space, which would be available for use by other users of the Project Site. Furthermore, it is expected that employees of the commercial uses would prefer to use parks and recreational facilities near their place of residence when not at the Project Site.

Additionally, the Project would comply with the City's Parks Dedication and Fee Update Ordinance (Ordinance No. 184,505) for the provision of open space and to dedicate land and/or pay in-lieu fees for parks and recreational facilities. As such, through compliance with the City's requirements and payment of applicable park fees, the Project would not substantially increase the demand for off-site public parks and recreational facilities and would not require the provision of new or physically altered parks and recreational facilities, the construction of which could cause significant environmental impacts. As such, the Project's potential impacts on parks would be less than significant, and no mitigation measures are required. No further analysis of the issue in an EIR is required.

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

**Less Than Significant Impact.** Other public facilities provided to the Project Site include library services. The Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles through its Central Library, 72 branch libraries, as well as through Web-based resources.<sup>67</sup> The Project area is served by existing LAPL facilities within the Hollywood Community Plan Area, including the Frances Howard Goldwyn–Hollywood Regional Library located 0.6 mile west of the Project Site.

The new residential population generated by the Project may result in additional demand for library services provided by the LAPL. However, while the new residents generated by the Project would be anticipated to make use of the various libraries serving the Project Site, not all residents would use the library or travel to the same library. Additionally, the Project's residential units would be equipped to allow individual internet service, which provides information and research capabilities that studies have shown to reduce demand at physical library locations.<sup>68,69</sup> The LAPL also provides access to a

Los Angeles Public Library Strategic Plan, 2015–2020.

Denise A. Troll, How and Why Libraries are Changing: What We Know and What We Need to Know, Carnegie Mellon University, 2002.

variety of web-based collections, reducing the demand for physical library locations. Furthermore, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, and business tax, etc.) that could be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the Project Site and vicinity, as deemed appropriate. The Project's revenue to the General Fund would help offset the Project-related increase in demand for library services. With the installation of internet service capabilities throughout the Project Site and the generation of revenues to the City's General Fund that could be applied toward the provision of new library facilities and related staffing, impacts on library facilities would be less than significant, and no mitigation measures are required. No further evaluation of this issue in an EIR is required.

### XVI. RECREATION

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

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

Less Than Significant Impact. As previously discussed, parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. Nearby public parks and recreational facilities within an approximate 2-mile radius include Carlton Way Park (0.12 mile south); Seily Rodriguez Park (0.69 mile south); Selma Park (0.70 mile west); Yucca Park and Yucca Community Center (0.86 mile west); De Longpre Park (0.91 mile southwest); La Mirada Park (0.93 mile southeast); Barnsdall Art Park (1.52 miles east); Runyon Canyon Park (1.64 miles northwest); and Burns (Robert L) Park (1.80 miles south).

As previously discussed, while the population increase associated with the Project could generate additional demand for parks and recreational facilities in the vicinity of the Project Site, the Project would comply with the City's requirements, including LAMC Section 12.33 for the payment of park

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<sup>&</sup>lt;sup>69</sup> Carol Tenopir, "Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies," 2003.

<sup>&</sup>lt;sup>70</sup> City Administrative Officer, City of Los Angeles 2016–2017 Budget Overview, July 2016.

fees. In addition, the Project would comply with applicable open-space requirements with respect to the Project's residential component. As discussed above, the Project would provide common open space at the ground level that could be publicly accessible during daytime hours in the form of gardens, courtyards, and terraces. The common open space proposed to be provided within the Project Site would total 42,602 square feet, pursuant to the requirements of the LAMC. As illustrated in Figure 9 in Section 3, Project Description, of this Initial Study, the primary public open space amenity would be a landscaped and paved central plaza along Hollywood Boulevard, which would include access to retail, outdoor dining, and terrace stairs that provide additional gathering space as well as access to a landscaped upper plaza and residential garden walk. Interior common areas would include resident amenities such as a pool deck, view deck, fitness areas, game rooms, lounges and meeting rooms. Additional common area opens spaces will be provided in gardens and terraces throughout the Project Site. Many of the residential structures would also include roof top open spaces.

Due to the amount, variety, and availability of the proposed open space and recreational amenities provided within the Project Site, including publicly accessible open space, it is anticipated that Project residents and employees would often utilize on-site open space and common areas to meet their recreational needs. Thus, while the Project's residents would be expected to utilize off-site public parks and recreational facilities to some degree, the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. In addition, pursuant to Section 12.33 of the LAMC, the Applicant would be required to comply with applicable park fee requirements with regard to the residential component of the Project, which would be used to increase recreational opportunities for project residents and improve existing parks, both of which would reduce the Project resident's use of existing parks and recreational facilities and/or address any deterioration of those facilities. Thus, based on the above, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated, and impacts would be less than significant. No mitigation measures are required, and no further analysis of the issue in an EIR is required.

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

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

#### XVII. TRANSPORTATION

		Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
W	ould 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?			$\boxtimes$	

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

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

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

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

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

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

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

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

**Potentially Significant Impact.** The Project would not introduce hazards due to incompatible uses such as farm equipment. However, the Project would include new access improvements, including driveways to the Project Site. Therefore, further discussion of this topic will be provided in the EIR.

## d. Would the project result in inadequate emergency access?

Less Than Significant Impact. According to the City General Plan Safety Element, California Government Code Section 65302(q)(1) specifies the need to plan for swift evacuation in the event of a fire or other emergency. In response, the City includes a wide range of physical environments and dramatic differences in population density based on the time of day or day of the week. To better accommodate the variety of evacuation scenarios, the City has developed a dynamic approach to evacuation response, one that can respond to different conditions. As specified in the City EOP Evacuations Annex "primary evacuation routes consist of the major interstates, highways, and primary arterials within the City and Los Angeles County." However, in response to a more localized emergency, such as a hillside wildfire, the LAFD works in coordination with the Los Angeles Department of Transportation and Los Angeles Police Department to identify the most appropriate local egress option and direct individuals to those routes. Other routes are shared in real time depending on which disaster and suitable evacuation routes are identified.<sup>71</sup> 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

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

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 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. Therefore, the Project would not result in inadequate emergency access to the Project Site or surrounding uses. Impacts regarding emergency access would be less than significant, and no further evaluation of this topic in an EIR is required.

#### XVIII. TRIBAL CULTURAL RESOURCES

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

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

- a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?
- b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public

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

Potentially Significant Impact (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. On April 25, 2023, the City mailed a project notification letter to the Gabrieleño Band of Mission Indians-Kizh Nation (Tribe). The City has received the Tribe's request for tribal consultation.

The Project would require excavations for the three level below-ground parking garage which could have the potential to disturb existing but undiscovered tribal resources. Therefore, the potential exists for the Project to impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with AB 52, the City will participate in the requested consultation for the Project as described above. Further evaluation of this topic will be provided in the EIR.

## XIX. UTILITIES AND SERVICE SYSTEMS

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

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

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

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

With regard to storm water drainage, as discussed above in Checklist Question X, Hydrology and Water Quality, a comparison of the pre- and post-Project peak flow rates indicates a decrease in stormwater runoff from the Project Site from 10.44 cubic feet per second under existing conditions to 9.69 cubic feet per second with the implementation of the Project. In addition, the BMPs implemented as part of the Project would control stormwater runoff and ultimately reduce or eliminate the discharge of potential pollutants from stormwater runoff. Therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. As such, the Project would not require or result in the relocation or construction of new or expanded storm water drainage.

With regard to telecommunications infrastructure, the Project would require construction of new on-site telecommunications infrastructure to serve the new buildings and potential upgrades and/or relocation of existing telecommunications infrastructure. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. Such activities could involve temporary closure of portions of sidewalks or travel lanes. However, the Project would implement a construction management plan during construction, which would ensure safe pedestrian access, as well as emergency vehicle access and safe vehicle travel in general, to reduce any temporary pedestrian and traffic impacts occurring as a result of construction activities. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration (i.e., months) and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution with minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications

systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers and the City, as applicable. Therefore, impacts would be less than significant, and no further analysis of this topic in an EIR is required.

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

**Potentially Significant Impact.** LADWP supplies water to the Project Site. Given the Project's increase in 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 this issue will be provided in the EIR.

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

**Potentially Significant Impact**. The Project would result in an increase in wastewater generation from the Project Site. Therefore, further analysis of this issue will be provided in the EIR.

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

Less Than Significant Impact. While the LASAN generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential, commercial and institutional developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the Los Angeles County are categorized as either Class III (e.g., landfills permitted to accept non-hazardous and non-designated solid waste) or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, is disposed of in inert waste landfills.<sup>72</sup> Ten Class III landfills and one inert landfill are currently operating within the County.<sup>73</sup> In addition, there is one solid waste transformation facility within Los Angeles County (Southeast Resource Recovery Facility) that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery.<sup>74</sup>

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

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

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

Based on the 2020 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the most recent report available, the total amount of solid waste disposed at in-county Class III landfills, transformation facilities, and exports to out-of-County landfills was 14.57 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 36,544 tons per day, and the remaining lifespan of each landfill ranges from 8 to 35 years. The estimated remaining capacity for the County's Class III landfills open to the City of Los Angeles is approximately 132.58 million tons as of December 31, 2020.<sup>75</sup> In addition, the permitted inert waste landfill serving the County is Azusa Land Reclamation.<sup>76</sup> This facility has 64.64 million tons of remaining capacity and an average daily in-County disposal rate of 1,032 tons per day.<sup>77</sup> Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the ColWMP 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.<sup>78</sup>

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

#### Construction

As summarized in Table 2 on page 81, to provide for the proposed improvements, the Project would remove approximately 31,833 square feet of existing commercial (automotive dealership) uses and construct 350 residential uses; 136,000 square feet of office uses; and 22,542 square feet of retail uses.

Pursuant to the requirements of SB 1374,<sup>79</sup> the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of its non-hazardous demolition and construction debris.

In addition, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. As discussed above, non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, is disposed of in inert waste

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

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

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

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

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

Table 2
Project Demolition and Construction Waste Generation and Disposal

Land Use	Size	Generation Rate (lbs/sf) <sup>a</sup>	Total (tons)
Demolition Waste			
Commercial	31,833 sf	155.22	2,471
Total Demolition Waste			2,471
Construction Waste			
Residential	342,643 sf (350 du)	4.38	750
Office	136,000 sf	3.89	265
Retail/Restaurant	22,542 sf	3.89	44
Total Construction Waste			1,059
Total Demolition and Construction Waste (prior to diversion)			3,530
Total Disposal (After 75% Diversion)			883

lbs = pound

sf = square feet

Source: Eyestone Environmental, 2023.

landfills. Thus, although the total diversion rate may ultimately exceed 75 percent, this analysis conservatively assumes a diversion rate of 75 percent.

After accounting for mandatory recycling, as shown in Table 2, the Project would result in approximately 883 tons of construction and demolition waste. This amount of construction and debris waste would represent approximately 0.001 percent of the Azusa Land Reclamation Landfill's remaining disposal capacity of 64.64 million tons.<sup>80</sup> It should be noted that soil export is not included in the calculation of construction waste since soil is not disposed of as waste but, rather, is typically used as a cover material or fill at other construction sites requiring soils import. As reported above, the Azusa Land Reclamation landfill, the County's inert waste landfill, would be able to accommodate waste from the Project's construction activities.

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

<sup>&</sup>lt;sup>a</sup> U.S. Environmental Protection Agency, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, Report No. EPA530-R-09-002, March 2009, Tables 4 and 6.

<sup>80 (881</sup> tons  $\div$  64.64 million tons) \* 100 = 0.001 percent.

#### Operation

As shown in Table 3 on page 83, based on solid waste generation factors from LASAN, the Project would generate approximately 1,001 net tons of solid waste per year. The estimated amount of solid waste is conservative because the waste generation factors do not account for recycling or other waste diversion measures. For example, the estimate does not account for AB 939, which requires California cities, counties, and approved regional solid waste management agencies responsible for enacting plans and implementing programs to divert 50 percent of their solid waste away from landfills. The estimate also does not account for compliance with AB 341, which requires California commercial enterprises and public entities that generate four or more cubic yards per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's recycLA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.

The Project's estimated solid waste disposal of 1,001 net tons per year represents approximately 0.008 percent of the remaining capacity (132.58 million tons) at the County's Class III landfills that serve the City. The Project's estimated solid waste generation would therefore represent a nominal percentage of the remaining daily disposal capacity of those landfills. As such, Project operation would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals or strategies identified in the ColWMP or by the City (refer to Response to Question No. XIX(e) regarding consistency with City solid waste planning goals). Therefore, the Project's potential construction impacts to solid waste facilities would be less than significant, and no mitigation measures would be required.

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

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

 $<sup>^{81}</sup>$  (1,001 tons per year  $\div$  132.58 million tons) \* 100 = 0.0008 percent.

Table 3
Estimated Project Solid Waste Generation

Land Use	Size	Employee Generation Rate <sup>a</sup>	Estimated No. of Employees	Solid Waste Generation Rate <sup>b,c</sup>	Total Generation (tons/year)
Existing to Be Removed					
Retail	31,833 sf	0.002	64	1.05 tn/emp/yr	67
Total Existing to Be Removed					67
Proposed					
Residential	342,643 sf (350 du)	N/A	N/A	2.23	781
Office	136,000 sf	0.004	544	0.37	201
Retail	18,004 sf	0.002	36	1.05	38
Restaurant	4,038 sf	0.004	16	2.98	48
Total with Implementation of Project					1,068
<b>Total Net Increase</b> (prior to diversion)					1,001

sf = square feet

du = dwelling units

emp = employees

tn = tons

yr = year

- Employee Generation Rates from Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, Table 1, May 2020. Based on the employee generation rate of 2.0 employees per 1,000 square feet for "General Retail," employee generation rate of 2.0 employees per 1,00 square feet for "General Office" applied to retail, and employee generation rate of 4.0 per 1,000 square feet for "High-Turnover Sit-Down Restaurant."
- Non-residential yearly solid waste generation factors from LASAN City Waste Characterization and Quantification Study, Table 4, July 2002. Assumes rate of 0.37 ton per employee per year for servicesbusiness, 1.05 tons per employee per year (Overall Commercial Sector) for retail uses, and 2.98 tons per employee per year for retail-restaurants.
- Residential solid waste generation factor based on a rate of 12.23 pounds per household per day (or 2.23 tons per household per year), pursuant to the L.A. CEQA Thresholds Guide.

Source: Eyestone Environmental, 2023.

landfills. In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste<sup>82</sup> on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week were required to arrange for organic waste recycling services. In addition, beginning

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

January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.<sup>83</sup> The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

#### XX. WILDFIRE

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact			
cla	located in or near state responsibility areas or lands assified as very high fire hazard severity zones, would a project:							
a.	Substantially impair an adopted emergency response plan or emergency evacuation plan?				$\boxtimes$			
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?							

<sup>&</sup>lt;sup>83</sup> Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

**No Impact.** As discussed above, the Project Site is located in an urbanized area and is developed with relatively flat topography. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or a City-designated Wildfire Severity Zone.<sup>84,85</sup> Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones and would not result in impacts related to impairing an adopted emergency response plan or emergency evaluation plan within a wildfire area. No impacts regarding wildfire risks or related post-fire conditions would occur, and no further evaluation of this topic in the EIR is required.

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

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

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

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

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

City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APNs 5545-006-029; 005-005; 005-022, http://zimas.lacity.org/, accessed April 4, 2023. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

<sup>&</sup>lt;sup>85</sup> City of Los Angeles, 2018 Local Hazard Mitigation Plan, Central APC, Figure 13-2., Wildfire Severity Zones, p. 277.

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

## XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

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

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

threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal.

As analyzed above, based on the Historical Resources Assessment, no historical resources are located on the Project Site; therefore, the Project would not result in a direct impact to historical resources. In addition, the Project would be constructed within the boundaries of the Project Site and would not directly affect any surrounding historical resources. Overall, the Project would not cause a substantial adverse change in the significance of a historical resource. Therefore, the Project would not eliminate important examples of the major periods of California history, and impacts would be less than significant.

As provided above, further evaluation of the Project's potential impacts to archaeological resources and paleontological resources will be included in an EIR.

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

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

- Aesthetics—Pursuant to Senate Bill 743 and ZI No. 2452, the Project is considered an employment center project on an infill site within a transit priority area, and thus in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment. Given the level of urbanization and transit in the Project vicinity, the majority of related projects would likewise be subject to SB 743 and could not combine with the Project to generate cumulative impacts under CEQA. Any related projects that are not subject to SB 743 would require appropriate analysis of potential impacts and mitigation, as necessary, to reduce such impacts to the extent feasible.
- Agricultural, Forest, and Mineral Resources—With regard to agriculture, forest
  resources, and mineral resources, no such resources are located on the Project Site or in
  the surrounding area. The Project would have no impact on these resources, and
  therefore could not combine with other projects to result in cumulative impacts. As such,
  cumulative impacts to agriculture, forest resources, and mineral resources would be less
  than significant.
- Air Quality (Odors)—Due to the site-specific nature, impacts related to other emissions (such as those leading to odors) adversely affecting a substantial number of people are

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

- Biological Resources—As it relates to biological resources, the Project vicinity is highly urbanized, and similar to the Project, other developments occurring in the vicinity would occur on previously disturbed land. The Project Site does not contain any sensitive biological resources, and there are no native or protected trees located on-site or within the adjacent rights-of-way. Like the Project, related projects involving tree removals would be required to comply with the Migratory Bird Treaty Act, and vegetation removal would be limited such that it would not occur during the nesting season to ensure significant impacts to migratory birds do not occur. As such, the Project would not contribute to a cumulative effect associated with biological resources.
- **Cultural Resources**—Impacts related to historical resources tend to be site-specific. however cumulative impacts could occur if: several projects affect local resources with the same level or type of designation and evaluation; affect other structures located within the same historic district; or involve resources that are significant within the same context. As discussed above, the Project would not result in any significant direct impacts to historic resources. None of the buildings on-site that would be removed by the Project are historical resources. Therefore, the Project would not result in direct impacts to historical resources. Historical resources in the vicinity are not directly adjacent to the Project Site. Instead, they are separated from the Project Site by streets. As a result, no indirect construction impacts could occur. In addition, other potential development projects would be subject to the same CEQA requirements as the Project and potential impacts to historic resources would be evaluated as part of those projects' environmental analysis. The determinations regarding impacts to historical resources from other development projects would be made on a case-by-case basis and the impacts of cumulative development on historical resources would be mitigated to the extent feasible. Therefore, Project impacts with respect to historic resources in the vicinity of the Project Site would not be cumulatively considerable, and cumulative impacts to historical resources would be less than significant.
- With regard to impacts related to human remains, if human remains were discovered during construction of any related projects, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.91 and 5097.98, as amended. Therefore, with the implementation of regulatory requirements, cumulative impacts related to human remains would be less than significant
- Geology and Soils—Due to their site-specific nature, geology and soils impacts are
  typically assessed on a project-by-project basis or for a particular localized area.
  Therefore, as with the Project, related projects would address site-specific geologic
  hazards through the implementation of site-specific geotechnical recommendations and/or
  mitigation measures. Thus, impacts would not be cumulatively considerable and would be
  less that significant.

- Hydrology and Water Quality—With regard to hydrology and water quality, related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, as with the Project, related projects 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.
- Land Use and Planning (Physically divide an established community)—No related projects that could cause land use incompatibility are known to be located in the immediate vicinity of the Project Site. Additionally, the Project's scope of work is limited to the Project Site, and the requested discretionary actions are site-specific. The Project would not amend or change the land use designation or zones of any of the other properties in the vicinity. Project-level impacts related to physically dividing an established community would be less than significant, and therefore could not combine with other projects to result in cumulative impacts. As such, cumulative impacts would be less than significant.
- Population and Housing—Regarding population and housing, related development would not induce substantial population growth in the vicinity of the Project Site since most of the area is already fully developed and occupied by a longstanding residential population. In addition, not all related projects would include residential uses. While the Project proposes the development of residential units, the net new population and housing that would be generated by the Project would be within SCAG's population and housing projections for the City of Los Angeles Subregion. Additionally, while the Project would not displace housing or people, other projects might displace existing housing and people residing in them. However, even if construction of replacement housing were required elsewhere, such developments would likely occur on infill sites within the City and the appropriate level of environmental review would be conducted to analyze the extent to which the related projects could cause significant environmental impacts. Overall, the Project's contribution would not be cumulatively considerable, and cumulative impacts related to population and housing would be less than significant.
- Public Services (Schools, Parks and Recreation, and Libraries)—Similar to the Project, construction of related projects would generate part-time and full-time jobs associated with construction of the related projects between the start of construction and buildout. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, which require construction workers to commute to job sites that change many times in the course of a year, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. Therefore, like the Project, the construction employment generated by related projects would not result in a notable increase in the resident population or a corresponding demand for schools, parks and recreation, and libraries in the vicinity of the Project Site.

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

- Utilities and Service Systems—Solid Waste—The Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction periods. However, as discussed above in Checklist Question No. XIX, unclassified landfills in the County do not generally have capacity concerns, and inert landfills serving the Project and the related projects would have sufficient capacity to accommodate construction waste disposal needs. With regard to operational solid waste disposal needs, the increase in solid waste generated by the Project would be well within the capacity of existing landfills, as discussed in Checklist Question No. XIX of this Initial Study. In addition, with the implementation of solid waste policies and objectives intended to help achieve the requirements of AB 939 and the City's 90 percent diversion goal, it is expected that the Project and related projects would not substantially reduce the projected timeline for landfills within the region to reach capacity. Furthermore, the County of Los Angeles conducts ongoing evaluations to ensure that landfill capacity is adequate to serve the forecasted disposal needs of the region. Therefore, the Project would not contribute considerably to cumulative solid waste impacts, and cumulative solid waste impacts would be less than significant.
- Wildfire—The Project Site is located in an urbanized area and there are no wildlands located in the vicinity of the Project Site. Therefore, the Project would not contribute to an increased wildfire risk. Moreover, the Project and related projects would be developed in accordance with LAMC and LAFD requirements pertaining to fire safety. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to wildfires. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less that significant.

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

**Potentially Significant Impact.** Based on the analysis contained in this Initial Study, the Project could result in potentially significant impacts with regard to the following topics: air quality; cultural resources (archaeological resources); energy; geology and soils (paleontological resources);

greenhouse gas emissions; hazards and hazardous materials; land use and planning; noise; public services (fire protection and police protection); transportation; tribal cultural resources; and utilities (water supply, wastewater, and energy infrastructure). As a result, these potential effects will be analyzed further in the EIR.