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

INITIAL STUDY

The Star Project

Case Number: ENV-2021-8030-EIR

Project Location: 6061–6087 Sunset Boulevard and 6056–6090 Harold Way, Los Angeles, California 90028

Community Plan Area: Hollywood Community Plan

Council District: 13—Soto-Martinez

Project Description: The Star Project (Project) involves the construction of a 29-story mixed-use building comprising 434,581 square feet of office uses, 40,324 square feet of restaurant uses, 22,265 square feet of entertainment production/production support uses, and 8,880 square feet of theater space, with a maximum building height of 460 feet. The Project would also include 21,873 square feet of outdoor dining areas, as well as other outdoor amenity areas. Upon completion, the Project would result in approximately 506,050 square feet of floor area on a two-acre site. All existing structures, totaling 72,877 square feet of floor area, would be demolished.

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

PREPARED BY:
Eyestone Environmental, LLC

APPLICANT:
The Star LLC

November 2025

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1 INTRODUCTION

An application for The Star 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 the Project is subject to the California Environmental Quality Act (CEQA) and that the preparation of an Initial Study is required.

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

1.1 PURPOSE OF AN INITIAL STUDY

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

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

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

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1. INTRODUCTION

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

2. EXECUTIVE SUMMARY

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

3. PROJECT DESCRIPTION

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

4. EVALUATION OF ENVIRONMENTAL IMPACTS

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

1.3 CEQA PROCESS

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

1.3.1 Initial Study

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

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

1.3.2 Draft EIR

Once the Draft EIR is complete, a Notice of Completion and Availability is prepared to inform public agencies and the general public of the availability of the document and the locations where the

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

1.3.3 Final EIR

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

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

2 EXECUTIVE SUMMARY

PROJECT TITLE	The Star
ENVIRONMENTAL CASE NO.	ENV-2021-8030-EIR
RELATED CASES	CPC-2021-8029-GPA-VZC-HD-MCUP-CUX-SPP-SPR VTT-83520
PROJECT LOCATION	6061–6087 West Sunset Boulevard and 6056–6090 West Harold Way, Los Angeles, California 90028
COMMUNITY PLAN AREA	Hollywood Community Plan
GENERAL PLAN DESIGNATION	High Medium Residential, Regional Center Commercial
ZONING **(VESTED)**	[Q]R4-1VL, C4-1-SN
COUNCIL DISTRICT	13—Soto-Martinez
LEAD AGENCY	**City of Los Angeles**
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	More Song, City Planner
ADDRESS	221 North Figueroa Street, Suite 1350 Los Angeles, CA 90012
PHONE NUMBER	(213) 978-1319
EMAIL	more.song@lacity.org
APPLICANT	Stellar Horizon LLC
ADDRESS	865 Comstock Ave, 11E,
PHONE NUMBER	(310) 595-3154

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

More Song, City Planner	November 21, 2025
PRINTED NAME, TITLE	**DATE**

EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

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

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

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

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

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

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

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

9) The explanation of each issue should identify:

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

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

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Star Project (Project) involves the demolition of four commercial office buildings and four residential buildings totaling 72,877 square feet of floor area for the construction of a 29-story mixed-use building comprising 434,581 square feet of office uses, 40,324 square feet of restaurant uses, 22,265 square feet of entertainment production/production support uses, and 8,880 square feet of theater space, with a maximum building height of 460 feet. The Project would also include 124,154 square feet of outdoor amenity areas and 21,873 square feet of outdoor dining areas. Upon completion, the Project would result in approximately 506,050 square feet of floor area on a 87,339-square-foot (approximately two-acre) site, equal to a Floor Area Ratio (FAR) of approximately 5.8:1.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located at 6061–6087 West Sunset Boulevard (Sunset Parcels) and 6056–6090 West Harold Way (Harold Parcels) within the Hollywood Community Plan area of the City of Los Angeles (City).[2] As shown in Figure 1 and Figure 2 on pages 8 and 9, the block that contains the Project Site is bounded by Harold Way to the north, Sunset Boulevard to the south, La Baig Avenue to the east, and Gower Street to the west. Regional access to the Project Site is provided by the Hollywood Freeway (US-101), which is located approximately 0.35 miles east of the Project Site. In addition, major arterials providing regional and sub-regional access to the Project Site include Sunset Boulevard, Gower Street, Hollywood Boulevard, and Vine Street.

The Project Site is served by a variety of public transit options, including various local and regional bus lines serviced by the Los Angeles County Metropolitan Transit Authority (Metro) and the Los Angeles Department of Transportation (LADOT). Specifically, Metro Lines 180, 217, and LADOT DASH Hollywood (HW) travel along Hollywood Boulevard; Metro Local Line 2, LADOT DASH HW, and LADOT DASH Hollywood/Wilshire (HWL) travel along Sunset Boulevard; and Metro Local Line 210 and LADOT DASH Beachwood Canyon and HWL travel along Vine Street. The Project Site is also located approximately 0.3 miles southeast of the Metro Hollywood/Vine Station, which serves the B Line of the Metro underground rail system.

3.2.2 Existing Conditions

As shown in Figure 2, the Project Site is located between a commercial strip plaza along the western property line and a motel along the eastern property line. The Project Site is currently occupied by four commercial office buildings located at 6061, 6063, 6069, 6075, 6085, 6087 Sunset Boulevard; three residential bungalows located at 6056, 6062, and 6066 Harold Way, and a back house located at 6062 ½ Harold Way; and a surface parking lot. The three bungalows and the back house are currently

[2] The Hollywood Community Plan Update (HCPU) became effective on February 11th, 2025, by action of the City Council. The application for this Project was filed before the HCPU became effective; therefore, the Project is vested in the zoning regulations in effect at that time, and the new zoning designations under the HCPU do not apply to this Project.



Figure 1
Project Location Map

Source: ArcGIS, 2025; Eyestone Environmental, 2025.



Figure 2
Aerial Photograph of the Project Site and Vicinity

Source: Google Maps, 2025; Eyestone Environmental, 2025.

vacant. The three bungalows have been designated as contributors to the Selma–La Baig Historic District.[3,4] The total floor area of the existing buildings on the Project Site is approximately 72,877 square feet. Vehicular access to the Project Site is currently available via a driveway along Harold Way and another from Sunset Boulevard leading into the surface parking lot, and individual curb cuts and driveways for the bungalows.

Existing landscaping within the Project Site includes 30 trees, including three Australian Bush Cherry, ten Camphor, 10 Chinese Elm, one Edible Fig, one Mulberry, and five Olive trees. In addition, there are 11 street trees within the public rights-of-way surrounding the Project Site which include Pink Trumpet trees and Mexican Fan palms. None of the 30 on-site trees or 11 street trees are protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.[5,6]

The Project Site is located in the Hollywood Community Plan, which designates the parcels fronting Sunset Boulevard for Regional Center Commercial land uses and the parcels fronting Harold Way for High Medium Residential land uses. The parcels fronting Sunset Boulevard are presently zoned [Q]C2-2D-SN-CPIO, and the parcels fronting Harold Way are presently zoned [Q]R4-1VL-CPIO. However, the Project was deemed complete on October 21, 2021; at that time, the parcels fronting Sunset Boulevard were designated for High Oriented Commercial land uses and zoned C4-1-SN, and the parcels fronting Harold Way were designated for High Medium Residential land uses and zoned [Q]R4-1VL.

The Harold Parcels are located on the northern portion of the Project Site and are designated for High Medium Residential land uses and are vested in the [Q]R4-1VL Zone (Qualified Condition, Multiple Dwelling zone, Height District 1VL).[7,8,9] Pursuant to LAMC Section 12.11 A, the R4 zone permits multi-family residential development, single family dwellings, apartment houses, parks, childcare facilities, churches and schools. Height District 1VL in conjunction with the R4 Zone permits a maximum FAR of 3:1 and a maximum height of 45 feet or three stories.[10]

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3 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5545-008-011, -012, -044, http://zimas.lacity.org/, accessed November 18, 2024, and March 21, 2025.

4 State of California Department of Parks and Recreation DPR523 Continuation Sheet, "Selma–Labaig District," page 1.

5 Carlberg Associates, City of Los Angeles Tree Inventory Report—6061-6087 Sunset Boulevard, 6056-6090 Harold Way, Los Angeles, California 90028, April 2025. See Appendix IS-1 of this Initial Study.

6 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.

7 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5545-008-011, -012, -044, http://zimas.lacity.org/, accessed November 18, 2024.

8 Los Angeles City Planning Commission, Letter of Determination, Case No. CPC-2016-1450-CPU, Exhibit E, Change Area Matrices and Mapping, p.7.

9 City of Los Angeles, Department of City Planning, Summary of Amendments to the Final Zone Change Ordinance for Hollywood Community Plan Update; CF 21-0934, September 24, 2024, p.1.

10 LAMC Section 12.21.1 A.

The Sunset Parcels are located on the southern portion of the Project Site and are designated for Regional Center Commercial land uses and are vested in the C4-1-SN Zone (Commercial zone, Height District 1, Sign District).[11] Pursuant to LAMC Section 12.16 A, the C4 zone permits a wide range of commercial uses, including office, retail, restaurant, and hotel uses, as well as any land use permitted in the R4 zone. Height District 1, in conjunction with the C4 Zone, allows unlimited building height but limits the FAR to 1.5:1.[12] Pursuant to LAMC Section 13.11, the SN designation indicates that the Sunset Parcels are located within the Hollywood Signage Supplemental Use District (HSSUD), which establishes various signage regulations, in addition to those set forth in the LAMC.

The Project Site is also identified by the City's Zoning Information and Map Access System (ZIMAS) as being in a Transit Priority Area as defined by Senate Bill (SB) 743 and City Zoning Information (ZI) File No. 2452. As described above, the Project Site is located approximately 0.3 miles southeast of the Metro Hollywood/Vine Station, which is a Major Transit Stop as defined by Section 21064.3 of the Public Resources Code. In addition, the Project Site is located within the boundaries of the Los Angeles State Enterprise Zone.[13]

3.2.3 Surrounding Land Uses

The Project Site is located within the highly urbanized Hollywood area of the City, which is known for its tourist attractions and as an entertainment destination that showcases Hollywood's history of music, film, entertainment, and dining. The land uses in the immediate vicinity of the Project Site are characterized by a mix of low- to high-rise buildings with commercial/retail uses, entertainment-related uses, offices, hotels, educational institutions, and single-family and multi-family residences. Properties to the north along Harold Way are zoned [Q]R4-1VL and are developed with various lower-density single- and multi-family residences, and the IO Music Academy Production School. To the south of the Project Site across Sunset Boulevard are the Sunset Gower Studios, which are zoned M1-1. To the east of the Project Site is the Hollywood Palms Inn and Suites, which is zoned [Q]R4-1VL and C4-1-SN. Properties to the west of the Project Site are developed with commercial uses including a liquor store, restaurants/cafes, and office uses and are zoned C4-1 and C4-1-SN. Other nearby uses include Emerson College Los Angeles to the southeast along Sunset Boulevard, and the Columbia Square development, which includes a 23-story mixed-use tower located to the west along Sunset Boulevard.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

As detailed in Table 1 on page 12, the Project involves the development of a 506,050-square-foot mixed-use entertainment office building comprised of approximately 434,581 square feet of office uses, 40,324 square feet of restaurant uses, 22,265 square feet of entertainment production/production support uses, and 8,880 square feet of theater space. The Project would also include 124,154 square feet of outdoor amenity areas and 21,873 square feet of outdoor dining areas. Approximately

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[11] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5545-008-011, -012, -044, http://zimas.lacity.org/, accessed November 18, 2024.

[12] LAMC Section 12.21.1 A.

[13] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5545-008-011, -012, -044, http://zimas.lacity.org/, accessed November 18, 2024, and March 21, 2025.

Table 1
Existing and Proposed Floor Area

Land Use	Floor Area
Existing Floor Area (All to Be Removed)	
Three Bungalows[a]	4,780 sf
Four Commercial Office Buildings	68,097 sf
Total Existing Floor Area to Be Removed	*72,877 sf*
Proposed Floor Area	
Office [b]	434,581 sf
Restaurant	40,324 sf
Entertainment Production/Production Support	22,265 sf
Theater (200 seats)	8,880 sf
Total Floor Area Upon Completion of Project	**506,050 sf**
Outdoor Restaurant Areas[c]	21,873 sf
Ancillary Basecamp Area[d]	4,060 sf

sf = square feet

[a] *The 6062 W Harold Way bungalow includes a back house unit.*

[b] *A 13,709-square-foot market place grab and go cafe is included in the square footage of the proposed office use.*

[c] *The Project would include a total of 21,873 square feet of outdoor dining areas–20,173 square feet located on the roof top (level 29) and 1,700 square feet located on the ground floor (1,350 square feet of uncovered and 350 square feet of covered); however, these areas are not included as part of the total floor area since they are not floor area per LAMC Section 12.03. To ensure a conservative analysis, the Initial Study applies a full-service restaurant use.*

[d] *As described above, the Project would also include 4,060 square feet of ancillary basecamp area; however, this area is not included as part of the total floor area since it is not floor area per LAMC Section 12.03. To ensure a conservative analysis, the Initial Study applies a production use.*

Source: Adamson Associates, Inc., 2025.

53,685 square feet of landscaped outdoor uncovered areas would also be provided on the ground floor and on the podium. The proposed uses would be located within a single 29-story building with a maximum height of 460 feet. The proposed building has been designed as a cylindrical structure that would include integrated covered outdoor areas throughout each level of the building. The Project would also include approximately 4,060 square feet of ancillary production basecamp areas located on the ground floor. Upon completion, the Project would result in 506,050 square feet of floor area, equal to a FAR of approximately 5.8:1.

Approximately 1,287 vehicular parking spaces would be provided within a six-level subterranean parking garage and 185 short-term and long-term bicycle parking spaces would be provided for the Project's proposed uses.

Four existing commercial office structures, three residential bungalows, and one back house totaling approximately 72,877 square feet of floor area, along with associated surface parking, would be removed as part of the Project.

The Project would require minor off-site improvements that would generally be contained within the adjacent rights-of-way to the Project Site. Off-site improvements would consist of sidewalk, curb, and gutter repair, planting of street trees, and removal and installation of various underground utility infrastructure requiring minor trenching.

3.3.2 Design and Architecture

The base of the building would consist of a two-level podium with a rooftop garden area. As illustrated in Figure 3 on page 14, the Project would create a pedestrian-oriented streetscape with active uses along Sunset Boulevard, including a ground floor restaurant, the building's office and fine dining restaurant lobbies, access to the subterranean parking and landscaped podium levels, and a theater with up to 200 seats. Additionally, the first floor would include an interior circulation and basecamp area, which would support the entertainment production and production support uses by providing areas for parking and loading for studio production vehicles, set up and take down of sets, and equipment storage. A basecamp area would also provide for activities such as wardrobe, hair, make-up, and craft service as well as parking and storage of mobile facilities and support vehicles. Ingress for a one-way internal loop for shuttle bus pick-up/drop-off and access for freight deliveries, production vehicles, and trash pickup, and a separate one-way loop for rideshare pick-up/drop-off would be located on the southwestern corner of the Project Site and egress would be on the southeastern corner of the Project Site. Ingress and egress to the six-level subterranean parking garage for passenger vehicles would be located on the southwestern corner of the Project Site. The second level would provide access to the building's mechanical, electrical, and plumbing systems as well as additional production support and theater space. As shown in Figure 4 and Figure 5 on pages 15 and 16, along Harold Way, the two-level podium wall would be covered with lush landscaping with building levels 3 through 29 stepped back towards Sunset Boulevard. The rooftop level of the podium (level 3) would include open space amenities such as gardens, a plaza, lawn and seating areas, and an exercise loop. Further, level 3 would include a 13,709 square foot office marketplace (grab and go café area), which would be available to the building tenants.

As shown in the conceptual rendering included as Figure 6 and Figure 7 on pages 17 and 18, the design of the building breaks down the overall massing through its cylindrical shape and stepped base. Levels 3 through 26 would include office uses with terraced outdoor areas containing lush vegetation, displayed in a way to showcase four continuous garden features that spiral up the building. Levels 27 through 29 would include a fine dining restaurant with the dining rooms located on levels 27 and 28 inclusive of outdoor terraced areas. The building's roof top level (level 29) is designed with an extruded aluminum profile that would partially cover the roof area and would include outdoor restaurant seating areas and landscaping that would maximize the panoramic city views.

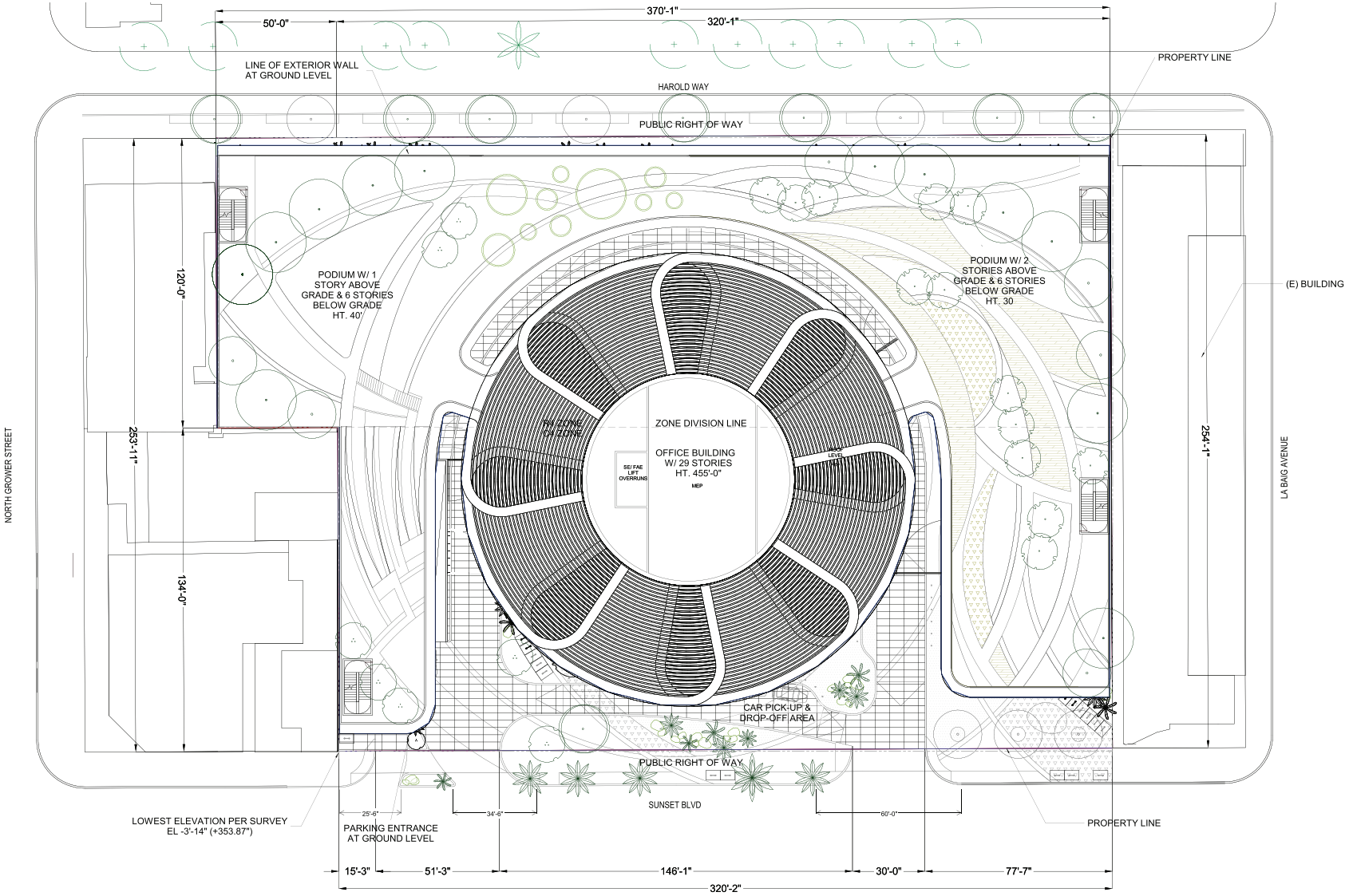


Figure 3
Conceptual Site Plan

Source: Foster + Partners, SALT Landscape Architects, and Adamson Associates, Inc., 2025.



Figure 4
Building Section—North-South

Source: Foster + Partners, SALT Landscape Architects, and Adamson Associates, Inc., 2025.



Figure 5
Building Section—East-West

Source: Foster + Partners, SALT Landscape Architects, and Adamson Associates, Inc., 2025.



Figure 6
Conceptual Rendering—East View along Harold Way

Source: Foster + Partners, SALT Landscape Architects, and Adamson Associates, Inc., 2025.



Figure 7
Conceptual Rendering—View from Sunset Boulevard

Source: Foster + Partners, SALT Landscape Architects, and Adamson Associates, Inc., 2025.

3.3.3 Outdoor Areas and Landscape Improvements

As a non-residential development, the Project is not required to provide open space in accordance with the LAMC. Notwithstanding, the Project's landscaping plan has been designed to provide useable outdoor areas on-site, while enhancing the public right-of-way and creating more effective transitions between off-site and on-site areas. As shown in Figure 8 on page 20, the Project would include a 37,931-square-foot roof garden on Level 3 of the podium that would include amenities such as gardens, a plaza, lawn and seating areas, and an exercise loop. Additionally, the Project would provide approximately 124,154 square feet of outdoor amenity areas and 21,873 square feet of outdoor dining areas.[14] As shown in Figure 9 on page 21, the Project's landscaping would use a varying plant palette and would be located throughout the Project Site to unify the building and activities on the ground floor and third level of the podium, within the spiral terraces and roof terrace, and along the streetscape. Plantings would include resilient, drought-tolerant, native, and adaptive tree, shrub, and groundcover species, including shade trees.

The Project would remove the 30 existing on-site trees and six of the 11 existing street trees, none of which are protected trees under the City's Protected Tree and Shrubs Ordinance No. 186,873. Pursuant to the requirements of the City's Urban Forestry Division and subject to approval of the Board of Public Works, the on-site trees to be removed would be replaced at a 1:1 ratio, and the street trees to be removed would be replaced at a 2:1 basis. The Project would replace the on-site trees with approximately 82 new trees, including Desert Willow (*Chilopsis linearis)*, Chinese Elm *(Ulmus parvifolia),* Blue Jacaranda *(Jacaranda mimosifolia),* California Palm *(Washingtonia filifera)*, Engelmann Oak *(Quercus engelmanii),* Valley Oak *(Quercus lovata),* Pink Malaleuca *(Malaleuca nesophila),* Desert Museum Palo Verde *(Cercidium x 'Desert Museum')*, Purple Fernleaf Acacia *(Acacia baileyana 'Purpurea'),* Pink Trumpet Tree *(Tobebuia impetiginosa),* Chinese Flame Tree *(Koelreuteria bipinnata),* California Bay Tree *(Umbellularia californica)*. In addition, the six existing street trees along Harold Way to be removed would be replaced with 12 new street trees including Blue Jacaranda *(Jacaranda mimosifolia)* and Chinese Elm *(Ulmus parvifolia)*. The five existing street trees along Sunset Boulevard would not be removed.

3.3.4 Access, Circulation, and Parking

As shown on Figure 10 on page 22, vehicular access to the Project Site would be provided from the Sunset Boulevard frontage. Ingress would be provided via a consolidated driveway at the southwestern corner, accommodating passenger vehicles, trucks, rideshares, and shuttle buses. This driveway would lead to: (1) a two-way ramp for the six-level subterranean parking garage, (2) a one-way internal loop for shuttle bus pick-up/drop-off and access for freight deliveries, production vehicles, and trash pickup, and (3) a separate one-way loop for rideshare pick-up/drop-off. Egress would be provided via a two-way driveway ramp located in the southwest corner of the Project Site from the subterranean parking garage, and from the one-way egress only exit on the southeast corner of the Project Site for rideshares, shuttle buses, freight trucks, production vehicles, and trash pickup trucks. The Project does not include any ingress or egress access along the Project Site's Harold Way frontage.

[14] The Project would include a total of 21,873 square feet of outdoor dining areas–20,173 square feet located on roof top (level 29) and 1,700 square feet located on the ground floor; however, these areas are not included as part of the total floor area since they are not floor area per LAMC Section 12.03. To ensure a conservative analysis, the Initial Study applies a full-service restaurant use.

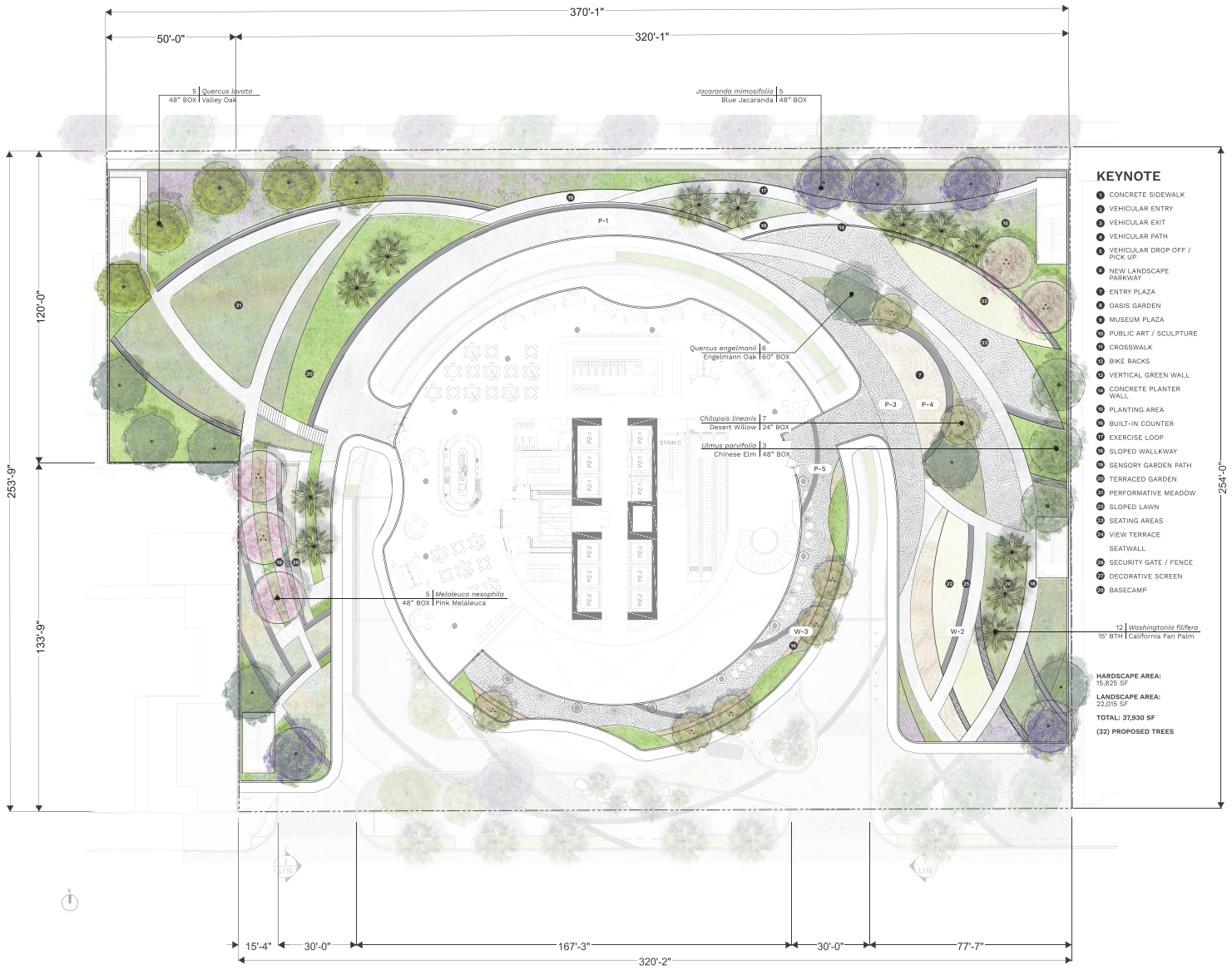


Figure 8
Landscape Site Plan—Podium

Source: Foster + Partners, SALT Landscape Architects, and Adamson Associates, Inc., 2025.

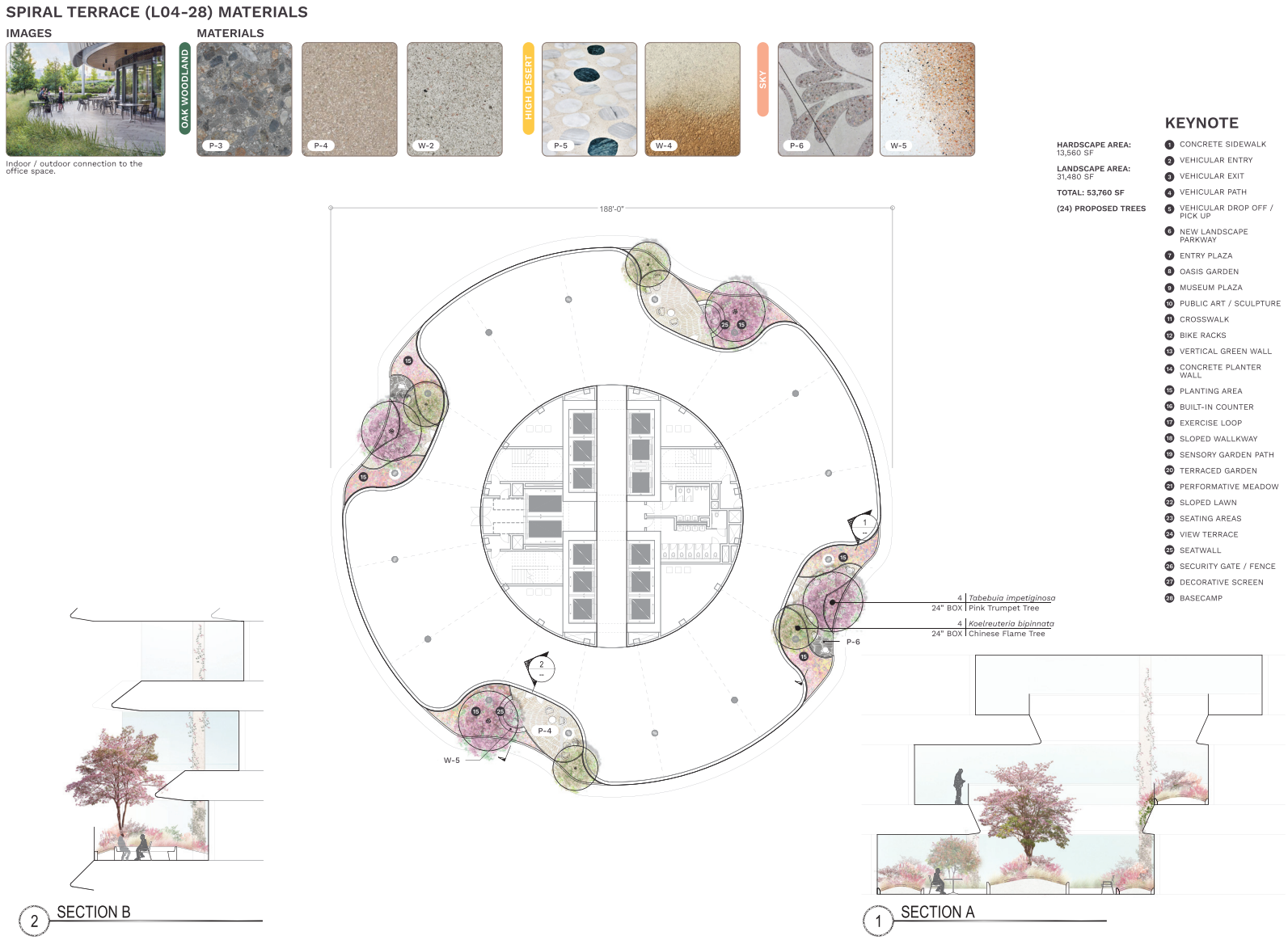


Figure 9
Landscape Site Plan—Spiral Terraces

Source: Foster + Partners, SALT Landscape Architects, and Adamson Associates, Inc., 2025.

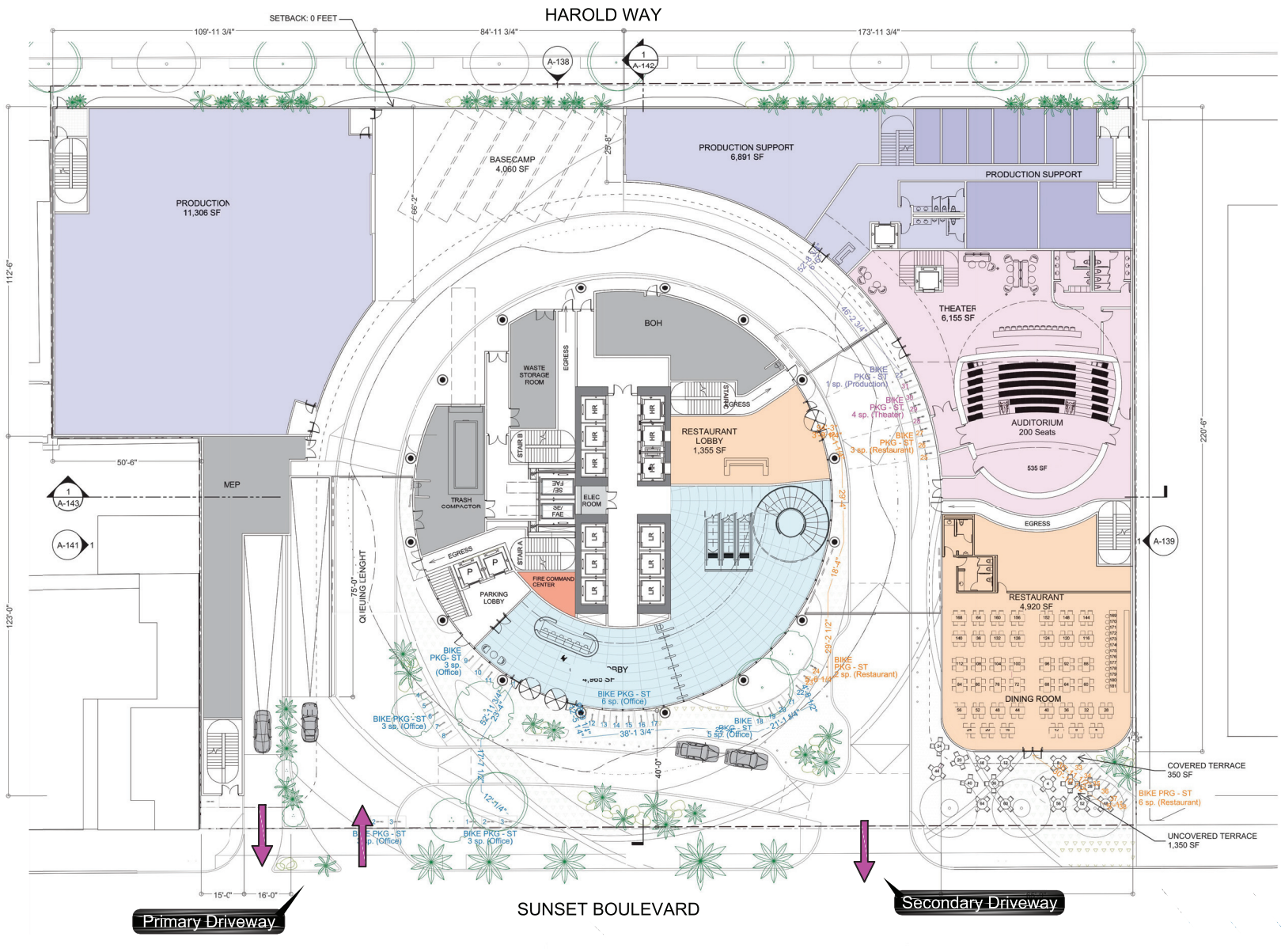


Figure 10
Access and Circulation Plan

Source: Gibson Transportation Consulting, Inc., 2025.

Primary pedestrian access to the Project Site would be provided via the entry plaza along the Sunset Boulevard frontage and expansive landscaped open space areas and pedestrian paths would be provided on the upper roof level of the podium.

The Project proposes approximately 1,287 vehicle parking spaces. A minimum of 387 spaces (30 percent) of the total vehicle parking spaces provided would be electric vehicle (EV) parking spaces. Of those, 258 spaces(20 percent of the total) would have electric vehicle charging stations. Additionally, the Project would provide 72 short-term and 113 long-term bicycle parking spaces in accordance with LAMC Section 12.21-A.16(a)(2), for a total of 185 bicycle parking spaces. Showers and lockers would also be provided pursuant to LAMC Section 91.6307.1.3.

3.3.5 Lighting and Signage

All Project lighting would comply with current energy standards and codes (i.e., California Code of Regulations, Title 24, Part 11; referred to as the CALGreen Code) in effect at the time of construction while providing appropriate light levels to accent signage, architectural features, and landscaping elements. Light sources would be shielded and/or directed toward Project Site areas to minimize light spill-over to neighboring properties and the surrounding area while utilizing low-level exterior lights at the site perimeter, as needed, for aesthetic, security, and wayfinding purposes. Additionally, new street and pedestrian lighting within the public right-of-way would provide appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties, in compliance with applicable City regulations and with approval by the City's Bureau of Street Lighting. Glass in building façades would be selected for qualities such as low reflectivity to reduce glare; energy efficiency to limit solar heat gain; high visibility for adequate light transmission; and acoustic performance to reduce noise from outside.

Proposed signage would be designed to be aesthetically compatible with the proposed architecture of the Project and its surroundings. The Project's signage would include identity signage, building and tenant signage, and general ground level and way-finding pedestrian signage that would comply with LAMC and HSSUD signage regulations. The HSSUD regulations are applicable to the Sunset Parcels of the Project Site and allow a maximum permitted sign area of 2 square feet for each 1 foot of linear street frontage, allowing the Project to include up to 640 square feet of signage along Sunset Boulevard. Further, a maximum of 1,280 square feet of signage would be allowed along Harold Way under LAMC Section 14.4.10 A.5. The Project would not include signage with flashing or mechanical properties. Project signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off site glare. Illumination used for Project signage would comply with light intensities set forth in LAMC Section 14.4.4 E and as measured at the property line of the nearest residentially zoned property.

3.3.6 Setbacks

The Project would provide setbacks on Sunset Boulevard and Harold Way. Specifically, the Project would include a seven-foot setback along Sunset Boulevard measured from the property line to the building edge, and a three-foot setback along Harold Way measured from the property line to the building edge.

3.3.7 Site Security

Project Site security would be achieved via a combination of physical and operational strategies aimed at providing a secure and safe and flexible working studio environment. Fencing, walls, landscaping, and other elements would be used to create a separation of the entertainment production uses to maintain the necessary privacy for certain production activities and ensure pedestrian safety and Project internal circulation. The west side of the tower would have a second security gate that would allow the auditorium to be closed or open to visitors without visitors having to enter the office building. In addition, vehicle points of entry would be secured by elements such as guard booths and/or key card passes, pedestrian and vehicular access controls, and site-wide lighting. Operational elements such as 24-hour security, employee and visitor badging, and visual surveillance would further enhance the security and safety of the production areas. Office lobbies would also include security-controlled access. Additionally, the Project would be designed such that entrances to and exits from the buildings, landscaped areas around the buildings, and pedestrian walkways would be open and in view of surrounding sites. Further, building exteriors and walkways would be properly lit 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.

3.3.8 Special Events

The Project's office, production, and restaurant uses, as well as outdoor spaces, may be used for hosting special events. The requested conditional use permit for the sale and dispensing of a full line of alcoholic beverages throughout the proposed entertainment production uses, theater use, restaurant uses, and certain outdoor spaces, would allow alcoholic beverages to be served in conjunction with those uses and during special events between the hours of 7:00 A.M. and 2:00 A.M. These events would include both production-related and non-production-related events, such as premieres, charitable events, community events, commercial events, and non-commercial events, and other special events as defined in LAMC Section 41.20.1(a).

3.3.9 Sustainability Features

The Project would be designed to be equivalent to the standards for United States Green Building Council Leadership in Energy and Environmental Design (LEED) Gold Certification. The Project would support environmental sustainability by incorporating sustainable building features and construction protocols required by the Los Angeles Green Building Code (LAMC Chapter IX, Article 9), the California Green Building Standards Code (California Code of Regulations, Title 24, Part 11; referred to as the CALGreen Code), and the California Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6; California Energy Code). The Project also represents an infill development in proximity to existing transit lines and walkable streets, and would utilize existing utility infrastructure to service the proposed uses. Sustainability features would include, but would not be limited to, water conservation features that include the use of native plants, passive cooling strategies, a bicycle-friendly site design, and waste reduction features (e.g., strategies to encourage recycling). Additionally, the Project would implement a capture and use cistern system within the basement level of the proposed building to capture stormwater runoff and hold it for subsurface irrigation in accordance with the City's Low Impact Development (LID) requirements.

3.3.10 Anticipated Construction Schedule

Project construction would begin with the demolition of the existing buildings and surface parking areas at the Project Site. The next phase of construction would include grading and excavation for foundations. The foundation would then be laid, followed by building construction, and then finally paving and landscaping installation. Project construction is anticipated to commence in 2028 and be completed in 2031. Project excavation would extend to a depth of up to 77 feet below ground surface. It is estimated that up to 300,000 cubic yards of export would be hauled from the Project Site. Construction delivery/haul trucks would travel on approved truck routes between the Project Site and US-101 via the following optional routes:

- **Incoming Truck Route 1:** Empty trucks would exit US-101 onto Sunset Boulevard, make a left turn onto Sunset Boulevard, and enter the Project Site on the right.
- **Incoming Truck Route 2:** Empty trucks would exit US-101 and head south on Gower St, then make a left onto Sunset Blvd, and enter the Project Site via a left turn.
- **Incoming Truck Route 3:** Empty trucks would exit US-101 and turn left onto Santa Monica Blvd, right onto Gower St, right onto Sunset Blvd, and enter the Site via a left turn.
- **Outgoing Truck Route 1:** Loaded trucks would exit the Project Site heading east on Sunset Boulevard proceed east to US-101 South.
- **Outgoing Truck Route 2:** Loaded trucks would exit the Project Site make a right turn onto Sunset Blvd, then a right onto Gower St, then a right onto Hollywood Blvd, and proceed east to US-101 South.
- **Outgoing Truck Route 3:** Loaded trucks would exit the Project Site make a right onto Sunset Blvd, then a left onto Gower St, then a left onto Santa Monica Boulevard, and proceed east to US-101 South.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. This Initial Study analyzes the potential environmental impacts associated with the Project and provides 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:

- A **General Plan Amendment** to amend the land use designation to Regional Center Commercial for the lots fronting Harold Way;
- A **Vesting Zone Change and Height District Change** to change the zoning to C2-2 for the lots fronting Harold Way and to C2-2-SN for the lots fronting Sunset Boulevard;
- A **Main Conditional Use Permit** to permit the sale and dispensing of a full line of alcoholic beverages for on-site consumption within two restaurants, an outdoor podium deck, production space, and a theater;.

- A **Site Plan Review** to permit the development of a project which creates or results in an increase of 50,000 square feet or more of nonresidential floor area;

- A **Zoning Administrator Interpretation** relative to the calculation of Floor Area for covered open space areas;

- A **Vesting Tentative Tract Map** for the merger and re-subdivision of the Project Site into one ground lot and 14 airspace lots, a waiver of a 10-foot dedication requirement along Harold Way, and a Haul Route for the export of 300,000 cubic yards of soil; and

- Other discretionary and ministerial permits that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, off-site or right-of-way encroachment permits, on-site and off-site tree removal permits, and sign permits.

3.5 RESPONSIBLE PUBLIC AGENCIES AND TRUSTEE AGENCIES

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

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) Section 21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." PRC Section 21099 defines a "transit priority area" as an area within 0.5 miles 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 or applicable regional transportation plan." PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail or bus rapid 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 20 minutes or less during the morning and afternoon peak commute periods.[15]*" PRC Section 21099 defines an "employment center project" as "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099 defines an "infill site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.*

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA."[16]

PRC Section 21099 applies to the Project as an employment center project located on an infill site within a TPA. The Project Site is located on an infill site, as that term is defined in PRC Section 21099(a)(4), because the Project Site is located within a highly urbanized area of the City and includes lots that have been previously developed. In addition, as illustrated in Figure 11 on page 28, 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 County Metropolitan Transit Authority (Metro) B 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 do not have to be evaluated under CEQA.

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[15] California Assembly Bill 2553, which went into effect on January 1, 2025, amends Section 21064.3 of the Public Resources Code to revise the definition of "major transit stop." The new definition increases the service interval frequency to 20 minutes, whereas the previous definition required a frequency of 15 minutes or less during peak commute periods.

[16] Department of City Planning, ZI No. 2452, TPAs/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA.



Figure 11
Project Site Location within a TPA

Source:Gibson Transportation Consulting, Inc., 2025.

The analysis regarding aesthetics in this Initial Study (or in the EIR, if any aesthetic impact discussion is included) is for informational purposes only and not for determining whether the Project will result in significant aesthetic impacts on the environment. As such, nothing in the aesthetic impact discussion in this Initial Study shall trigger the need for any CEQA Findings of Fact, CEQA analysis, or CEQA mitigation measures pursuant to PRC Section 21099(d)(1).

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

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

b. Would the project 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, 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?

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

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

II. AGRICULTURE AND FOREST RESOURCES

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

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

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

No Impact. The Project Site is located in an urbanized area of the City. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with four commercial office structures, three residential bungalows with one back house, and associated surface parking. No agricultural uses or operations 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.[17,18] 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.

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

No Impact. The Project Site is zoned [Q]R4-1VL (Qualified Condition, Multiple Dwelling zone, Height District 1VL) and C4-1-SN (Commercial, Height District 1, Sign District). The R4 zone permits multi-family residential development, single family dwellings, apartment houses, parks, childcare facilities, churches and schools. The C4 zone permits a wide range of commercial uses, including office, retail, restaurant, and hotel uses, as well as any land use permitted in the R4 zone. The Project Site is not zoned for agricultural use. Furthermore, no agricultural zoning is present in the surrounding area. Additionally, the Project Site and surrounding area are not enrolled under the California Land Conservation Act and are not subject to a Williamson Act Contract.[19] 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 discussed above in Response to Checklist Question II.a, the Project Site is located in an urbanized area and is currently developed with four commercial office structures, three residential bungalows with one back house, and associated surface parking. 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.[20] 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 discussed above in Response to Checklist Question II.c, the Project Site is located in an urbanized area and does not include any forest land. Therefore, the Project would not result in the

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17 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APN 5545-008-011, -012, -044, http://zimas.lacity.org/, accessed November 18, 2024 and March 21, 2025.

18 California Department of Conservation, California Important Farmland Finder, https://maps.conservation.ca.gov/DLRP/CIFF/App/index.html?marker=-118.29152006048791%2C34.02551004278704%2C%2C%2C%2C&markertemplate=%7B%22title%22%3A%22%22%2C%22longitude%22%3A-118.29152006048791%2C%22latitude%22%3A34.02551004278704%2C%22isIncludeShareUrl%22%3Atrue%7D&level=14, accessed March 21, 2025.

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

20 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5545-008-011, -012, -044, http://zimas.lacity.org/, accessed November 18, 2024 and March 21, 2025.

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 in Response to Checklist Question II.a and II.c, 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.[21] As such, the Project would not result in the conversion of farmland to non-agricultural use or in the conversion of forest land to non-forest use. No impacts would occur, and no further evaluation of this topic in an EIR is required.

III. AIR QUALITY

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

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

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

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (Basin). Within the Basin, the South Coast Air Quality Management District (SCAQMD) is required, pursuant to the federal Clean Air Act, to reduce emissions of criteria pollutants for which the

[21] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5545-008-011, -012, -044, http://zimas.lacity.org/, accessed November 18, 2024 and March 21, 2025.

Basin is in non-attainment (i.e., ozone, particulate matter less than 2.5 microns in size [$PM_{2.5}$], and lead[22]). SCAQMD's Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment.[23] With regard to future growth, SCAG has prepared their Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area. Construction and operation of the Project may result in an increase in stationary and mobile source air emissions. As a result, development of the Project could have a potential adverse effect on SCAQMD's implementation of the AQMP. Therefore, further evaluation of the Project's potential conflicts with the AQMP will be included in an EIR.

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

Potentially Significant Impact. As discussed above, construction and operation of the Project would result in the emission of air pollutants in the Basin, which is currently in non-attainment of federal air quality standards for ozone, $PM_{2.5}$ and lead, and State air quality standards for ozone, particulate matter less than 10 microns in size (PM_{10}), and $PM_{2.5}$. Construction related pollutants are anticipated to be associated with sources such as construction worker vehicle trips, trucks exporting debris or soil, operation of construction equipment, removal of the surface parking lot, site grading and preparation activities, and the application of architectural coatings. During Project operation, air pollutants would be emitted on a daily basis from motor vehicle travel, energy consumption, and other on-site activities. As a result, implementation of the Project would generate air quality emissions, which could potentially cause a cumulative impact in the Basin. Therefore, further evaluation of the Project's potential cumulative air pollutant emissions will be included in an EIR.

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

Potentially Significant Impact. According to the California Air Resources Board, sensitive receptors include children, the elderly, asthmatics, and others who are at a heightened risk of negative health outcomes due to exposure to air pollution. The locations where these sensitive receptors congregate are considered sensitive receptor locations. As discussed above, the Project could result in increased short- and long-term air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Sensitive receptors located in the vicinity of the Project Site include residential uses located to the north and west along Harold Way and La Baig Avenue. Therefore, further evaluation of the Project's potential to result in substantial adverse impacts to sensitive receptors will be included in an EIR.

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

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

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

Less Than Significant Impact. No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. With respect to Project 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.[24] 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.[25] 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.[26]

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

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐

[24] SCAQMD CEQA Air Quality Handbook, 1993.

[25] SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/rules-compliance/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed March 21, 2025.

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
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 developed with four commercial office structures, three residential bungalows with one back house, and associated surface parking. The Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County of Los Angeles (County).[27,28] In addition, there are no other sensitive natural communities identified by the California Department of Fish and Wildlife (CDFW) or the U.S. Fish and Wildlife Service (USFWS) located in or adjacent to the Project

[27] 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.

[28] County of Los Angeles, Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

Site.[29,30] Rather, the Project Site and surrounding areas contain urbanized and disturbed land. Due to the urbanized and disturbed nature of the Project Site, species likely to occur on-site or in surrounding areas are limited to small terrestrial and avian species typically found in urbanized developed settings. Based on the lack of species habitat on the Project Site and in the surrounding areas, it is unlikely that any special status species listed by the CDFW[31] or by the USFWS[32] would be present on-site.

According to the Tree Inventory Report prepared for the Project included in Appendix IS-1 of this Initial Study, existing landscaping within the Project Site includes 30 trees, including three Australian Bush Cherry, ten Camphor, 10 Chinese Elm, one Edible Fig, one Mulberry, and five Olive trees. None of the 30 on-site trees are protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.[33,34] In addition, there are 11 street trees within the public rights-of-way surrounding the Project Site that are not species that are protected by the Los Angeles Municipal (LAMC) (e.g., Pink Trumpet trees and Mexican Fan palms). Although unlikely, these trees could potentially provide nesting sites for migratory birds. However, the Project would comply with California Fish and Game Code Section 3503, which states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." While the Project would require the removal of 30 on-site trees and six street trees, which could potentially provide nesting sites for migratory birds, compliance with California Fish and Game Code Section 3503 and standard construction processes during nesting season would ensure that construction activities would not adversely affect nesting sites. In accordance with California Fish and Game Code Section 3503, with the implementation of BIO-PDF-1, tree removal activities associated with the Project would take place outside of the nesting season (February 1–September 15, to the extent feasible. Should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found during removal activities, a buffer would be established until the fledglings have left the nest. The size of the required buffer area would vary with the species and local circumstances (e.g., presence of busy roads) and would be based on the professional judgment of the monitoring biologist, in coordination with the CDFW.

Therefore, with implementation of BIO-PDF-1 which includes compliance with California Fish and Game Code Section 3503, Migratory Bird Treaty Act (MBTA), and standard construction processes, including best management practices during nesting season, the Project would not have a substantial adverse

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29 California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), Hollywood Quad Species List, https://apps.wildlife.ca.gov/bios6/, accessed March 21, 2025.

30 California Department of Fish and Wildlife, CDFW Lands, https://apps.wildlife.ca.gov/lands/, accessed March 21, 2025.

31 California Department of Fish and Wildlife, California Natural Diversity Database, Special Animals List, January 2025.

32 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, March 21, 2025.

33 Carlberg Associates, City of Los Angeles Tree Inventory Report—6061-6087 Sunset Boulevard, 6056-6090 Harold Way, Los Angeles, California 90028, April 2025. See Appendix IS-1 of this Initial Study.

34 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.

effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

Project Design Feature BIO-PDF-1: The Project Applicant shall include on the Project plans an acknowledgement of the requirements to comply with the Migratory Bird Treaty Act and California Fish and Game Code Section 3503 and best management practices recommended by a Qualified Biologist to avoid impacts to active nests, including checking for nests prior to construction activities during nesting season (February 1 to August 31) and what to do if an active nest is found, including inadvertently during grading or construction activities. To the extent feasible tree removal would occur outside of nest season. Such best management practices shall include giving an adequate construction and grading buffer to avoid the active nest during construction, such as the following:

- **Pre-Construction Survey:** For any Project requiring tree or vegetation removal during the bird nesting season (February 1 to August 31), a pre-construction nesting bird survey of all suitable habitat shall be conducted no more than 10 days prior to the initiation of demolition or tree or vegetation removal to determine if nesting birds are present. The pre-construction nesting bird survey shall be conducted on foot within the Project Site boundaries by a Qualified Biologist.
- **Buffer for Active Nests:** If any active bird nest is found during a pre-construction nesting bird survey or is discovered inadvertently during construction related activities, a Qualified Biologist shall recommend an avoidance buffer which shall be no less than is necessary to protect the nest, eggs and/or fledglings, from damage or disturbance in consideration of the following factors: the bird species, the availability of suitable habitat within the immediate area, the proposed work activity, and existing disturbances associated with surrounding land uses. The buffer shall be demarcated using bright orange construction fencing, flagging, or other similar means to mark the boundary of the buffer. All construction personnel shall be notified of the buffer zone and shall avoid entering the protected area. No ground disturbing activities or vegetation removal shall occur within this buffer area until the Qualified Biologist has confirmed that breeding/nesting is complete and the young have fledged the nest and/or that the nest is no longer an active nest.

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

No Impact. The Project Site is located in an urbanized area and is currently developed with four commercial structures, three residential bungalows with one back house, and associated surface parking. No riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area.[35,36] Furthermore, the Project Site and surroundings are not located in or adjacent to

[35] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5545-008-011, -012, -044, http://zimas.lacity.org/, accessed November 18, 2024 and March 21, 2025.

[36] United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed March 21, 2025.

a Biological Resource Area or Significant Ecological Area as defined by the City or County.[37,38] There are no other sensitive natural communities identified by the CDFW or the USFWS on the Project Site or its surroundings.[39,40] 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. The Project Site is located in an urbanized area and is currently developed with four commercial office structures, three residential bungalows with one back house, and associated surface parking. No state and federally protected wetlands exist on the Project Site or in the immediate surroundings of the Project Site.[41] As such, the Project would not have a substantial 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. The Project Site is located in an urbanized area and is currently developed with four commercial office structures, three residential bungalows with one back house, and associated surface parking. 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. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County.[42,43]

According to the Tree Inventory Report prepared for the Project included in Appendix IS-1 of this Initial Study, existing landscaping within the Project Site includes 30 trees, including three Australian Bush Cherry, ten Camphor, 10 Chinese Elm, one Edible Fig, one Mulberry, and five Olive trees. None of the 30 on-site trees are protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No.

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37 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.

38 County of Los Angeles, Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

39 California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), Hollywood Quad Species List, https://apps.wildlife.ca.gov/bios6/, accessed March 21, 2025.

40 California Department of Fish and Wildlife, CDFW Lands, https://apps.wildlife.ca.gov/lands/, accessed March 21, 2025.

41 United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/data/Mapper.html, accessed March 21, 2025.

42 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.

43 County of Los Angeles, Department of Regional Planning, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, February 2015.

186,873.[44,45] In addition, there are 11 street trees within the public rights-of-way surrounding the Project Site that are not species that are protected by the LAMC (e.g., Pink Trumpet trees and Mexican Fan palms).

As part of the Project, 30 existing on-site trees and six street trees would be removed. Although unlikely, these trees could potentially provide nesting sites for migratory birds. However, the Project would comply with the MBTA[46], which prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. The Project would further comply with the MBTA regulations by conducting tree or vegetation removal activities outside of the nesting season (February 1–August 31), to the extent feasible, and consistent with Project Design Feature BIO-PDF-1, if tree or vegetation removal activities occur during the nesting season, the Applicant would retain a biological monitor during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and is based on the professional judgement of the monitoring biologist, in coordination with the CDFW, as appropriate. Additionally, the Project would comply with the California Fish and Game Code Section 3503, which states that "[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." In accordance with City requirements, these trees would be replaced at a 2:1 ratio.

Overall, in compliance with the MBTA and California Fish and Game Code Section 3503 which are ensured through Project Design Feature BIO-PDF-1, and standard construction processes during nesting season, and replacement of street trees in accordance with the Bureau of Street Services, Urban Forestry Division's requirements, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

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

No 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), Southern California black walnut trees, Western sycamore trees, California Bay trees, Mexican Elderberry shrubs, and Toyon shrubs of at least 4 inches in cumulative diameter at breast height or 4.5 feet above the ground level at the base of the tree or shrub. These tree and shrub

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44 Carlberg Associates, City of Los Angeles Tree Inventory Report—6061-6087 Sunset Boulevard, 6056-6090 Harold Way, Los Angeles, California 90028, April 2025. See Appendix IS-1 of this Initial Study.

45 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.

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

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 the root system or other parts of the tree or shrub…” The protected tree or shrub must be replaced within the property by at least four specimens of a protected variety, except where the protected species is relocated pursuant to the LAMC. In addition, a protected tree shall only be replaced by other protected tree varieties and shall not be replaced by shrubs. A protected shrub shall only be replaced by other protected shrub varieties and shall not be replaced by trees, to the extent feasible as determined by the Advisory Agency, Board of Public Works, or a licensed or certified arborist.

According to the Tree Inventory Report prepared for the Project included in Appendix IS-1 of this Initial Study, existing landscaping within the Project Site includes 30 trees, including three Australian Bush Cherry, ten Camphor, 10 Chinese Elm, one Edible Fig, one Mulberry, and five Olive trees. In addition, there are 11 street trees within the public rights-of-way surrounding the Project Site. As part of the Project, 30 existing on-site trees and six street trees would be removed. However, in accordance with the Bureau of Street Services, Urban Forestry Division’s requirements and Street Tree Ordinance No. 153500, the Project would replace the removed street trees at a 2:1 ratio. On-site trees would be replaced at a 1:1 ratio. None of the on-site trees or street trees are considered protected by the City of Los Angeles’ Tree Preservation Ordinance No. 186,873. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources, including the City of Los Angeles’ Tree Preservation Ordinance No. 186,873. No impact would occur, 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 in Response to Checklist Question IV.a, the Project Site is located in an urbanized area and is currently developed with four commercial office structures, three residential bungalows with one back house, and associated surface parking. No Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.[47] 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.

[47] California Department of Fish and Wildlife, California Natural Community Conservation Plans, August 2023.

V. CULTURAL RESOURCES

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

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

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

As previously described, the Project Site is currently developed with four commercial office structures, three residential bungalows with one back house, and associated surface parking. As discussed in Section 3, Project Description, of this Initial Study, the three bungalows have been designated as contributors to the Selma–La Baig Historic District. Therefore, further evaluation of the Project's potential impacts on historical resources will be included in an EIR.

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

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

important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within an urbanized area of the City and has been subject to grading, excavation and fill activities, and development in the past. Therefore, surficial archaeological resources that may have existed at one time have likely been previously disturbed. Nevertheless, the Project would require excavation up to approximately 77 feet below existing grade. Therefore, further evaluation of the Project's potential to disturb previously undiscovered archaeological resources will be included in an EIR.

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

Potentially Significant Impact. As previously discussed above, the Project would require excavation up to approximately 77 feet below existing grade, trenching within the public right-of-way for utility connections, and other construction activities that could have the potential to disturb existing but undiscovered human remains. Therefore, further evaluation of the Project's potential to disturb previously undiscovered human remains will be included in an EIR.

VI. ENERGY

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

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

Potentially Significant Impact. The Project would generate an increased demand for electricity and, potentially, natural gas services provided by the Los Angeles Department of Water and Power (LADWP) and the Southern California Gas Company, respectively, as well as petroleum based fuels, 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 an EIR.

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

Potentially Significant Impact. First established in 2002 under SB 1078, California's Renewables Portfolio Standard (RPS) requires all electric load serving entities to procure 60 percent of their electricity portfolio from eligible renewable energy resources by 2030.[48] LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources.

Regarding energy efficiency, the California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction, system design, and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2022 Title 24 standards, which became effective on January 1, 2023.[49]

As previously described, the Project Site is currently developed with four commercial office structures, three residential bungalows with one back house, and associated surface parking. The Project Site does not include any renewable energy sources used by LADWP. The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and the State's Green Building Standards Code (CALGreen). While the Project would not be anticipated to conflict with or obstruct a State or local plan for renewable energy or energy efficiency, further evaluation of the Project's compliance with LADWP's plans for renewable energy, as well as the Project's compliance with California Building Energy Efficiency Standards, will be provided in an EIR.

VII. GEOLOGY AND SOILS

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

[48] CPUC, California Renewables Portfolio Standard (RPS) Program, www.cpuc.ca.gov/RPS_Overview/, accessed March 21, 2025.

[49] CEC, 2019 Building Energy Efficiency Standards, www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency, accessed March 21, 2025.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☒	☐	☐	☐

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.

Potentially 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 of Los Angeles designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

The Project Site is not located within a City-designated Fault Rupture Study Area or an Alquist-Priolo Earthquake Fault Zone as mapped by CGS.[50,51] The closest fault zone is associated with the Hollywood Fault and is located approximately 1,000 feet north of the Project Site. Given the Project Site's location in the seismically active Southern California region, further evaluation in regard to the potential for fault rupture will be provided in an EIR.

ii. Strong seismic ground?

Potentially 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. Additionally, the Project would increase the amount of development on-site, thereby increasing the number of people on-site exposed to potential adverse effects from ground shaking. Further evaluation of the potential for strong seismic ground shaking will be provided in an EIR.

iii. Seismic-related ground failure, including liquefaction?

Potentially Significant Impact. Liquefaction is a phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: shallow groundwater; low density, fine, clean sandy soils; and strong ground motion. The Project Site is not located within an area identified by the City, County, or CGS as having a potential for liquefaction.[52,53] However, development of the Project would include excavations to a maximum depth of 77 feet below grade and have the potential to encounter groundwater, which, in combination with certain soil conditions, could increase the potential for seismic-related ground failure such as liquefaction. As such, further evaluation regarding the potential for liquefaction will be included in an EIR.

iv. Landslides?

No Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and the Project Site is generally characterized by relatively level topography. Given the largely impervious (developed/paved) and topographically flat nature of the Project Site and the immediate surrounding area, 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

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50 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5545-008-011, -012, -044, http://zimas.lacity.org/, accessed November 18, 2024 and March 21, 2025.

51 California Department of Conservation, Earthquake Zones of Required Investigation, https://maps.conservation.ca.gov/cgs/EQZApp/, accessed March 21, 2025.

52 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5545-008-011, -012, -044, http://zimas.lacity.org/, accessed November 18, 2024 and March 21, 2025.

53 California Department of Conservation, Earthquake Zones of Required Investigation, https://maps.conservation.ca.gov/cgs/EQZApp/, accessed March 21, 2025.

area by the City.[54,55] Therefore, the Project would not directly or indirectly cause potential substantial adverse effects involving landslides. As such, no impact would occur, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Given the largely impervious (developed/paved) nature of the Project Site, there are limited landscaped areas with exposed topsoil. However, 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 the 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 Low Impact Development (LID) Ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Therefore, with compliance with all applicable regulatory requirements, impacts regarding soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

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

Potentially Significant Impact. As discussed above, the Project Site is susceptible to ground shaking and thus the potential for lateral spreading, subsidence, and liquefaction may be present. As such, further evaluation of geologic stability will be provided in an EIR.

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

Potentially Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. The Project Site may contain soils that are considered to have a moderate to high expansive potential. Therefore, further evaluation of expansive soils will be provided in an EIR.

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?

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[54] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5545-008-011, -012, -044, http://zimas.lacity.org/, accessed November 18, 2024 and March 21, 2025.

[55] California Department of Conservation, Earthquake Zones of Required Investigation, https://maps.conservation.ca.gov/cgs/EQZApp/, accessed March 21, 2025.

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. 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 excavation up to a depth of 77 feet below existing grade, and other construction activities that 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 an EIR.

VIII. GREENHOUSE GAS EMISSIONS

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

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

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

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

Potentially Significant Impact. The Project would have the potential to emit GHGs. Therefore, further evaluation of Project-related emissions and associated emission reduction strategies 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 MATERIALS

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

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

Potentially Significant Impact. The types and amount of hazardous materials potentially used in connection with the construction and operation of the Project are anticipated to be typical of those used for studio, office, and commercial uses. 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, and pesticides for landscaping. Project construction and set fabrication during Project operation may also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. Additionally, deep excavation activities could encounter contaminated soil or groundwater due to the historical uses of surrounding properties. Accordingly, further analysis of these potential impacts will be provided in the EIR.

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

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with four commercial office structures, three residential bungalows with one back house, and associated surface parking. The existing buildings were constructed in 1909, 1920, 1931, and 1947. Therefore, given 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 an EIR to determine the Project's potential impacts with respect to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

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

Potentially Significant Impact. The nearest school is Emerson College, located approximately 200 feet southeast (less than 0.1 miles) of the Project Site along Sunset Boulevard. As discussed above, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of office, studio, and commercial developments and would include fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed uses would be typical of such developments and would include cleaning products, paints, and those used for landscaping maintenance. While the Project is not expected to involve hazardous emissions or handle acutely hazards materials, substances, or waste, due to the Project's proximity to schools, further evaluation of this topic will be included in the EIR.

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

No Impact. Section 65962.5 of the California Government Code requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a collective database of hazardous waste sites and other contaminated sites compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Resources Control Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions or extensive investigations are planned or have occurred.

Based on a review of several databases found in CalEPA's Cortese List Data Resources webpage,[56] the Project Site is not listed on any of the databases that comprise the Cortese List. Therefore, the Project Site's location on a list of hazardous materials sites would not create a significant hazard to the public or the environment. No impact would occur, and no further evaluation of this topic in an EIR is required.

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

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

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

Less Than Significant Impact. California Government Code Section 65302(g)(1) specifies the need to plan for swift evacuation in the event of a fire or other emergency. The City's General Plan Safety Element (Safety Element) responds to this State Code by identifying the dramatic differences and population density based on the time of day or day of the week within the city of Los Angeles. According to the Safety Element, 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 within the city. As specified in the City Emergency Operations Plan (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 Los Angeles Fire Department (LAFD) works in coordination with the Los Angeles Department of Transportation (LADOT) and Los Angeles Police Department (LAPD) to identify the most appropriate local egress option and direct individuals to those routes. Other routes are shared in real time depending on which disaster and suitable evacuation routes are identified.[57] While it is expected that the majority of construction activities for the Project would be confined to the Project Site, off-site construction activities could occur in adjacent street rights-of-way, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would remain open such that at least one travel lane in each direction would be available. Furthermore, in accordance with standard construction practices, the Project would provide temporary traffic controls such as flag persons to manage traffic movement during temporary traffic flow disruptions. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure adequate emergency access. In the event of an emergency during construction of the Project, the LAFD and the LAPD would instruct businesses and residents of the area as to the specific evacuation plan as set forth in the Safety Element. The Applicant and construction contractor would comply with all instructions of the LAFD and LAPD as to evacuation

[56] CalEPA. Cortese List Data Resources, available at https://calepa.ca.gov/sitecleanup/corteselist/, accessed November 3, 2025.
[57] Safety Element, November 2021, p. 23.

requirements. In addition, while operation of the Project would generate traffic in the Project Site vicinity and would result in some modifications to the Project Site's access, the Project would comply with LAFD access requirements and would not impede emergency access in the Project Site vicinity. Therefore, the Project would not physically interfere with or impair the implementation of an emergency evacuation plan. The Project's potential impacts would be less than significant, and no further evaluation of this topic in the EIR is required.

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

No Impact. The Project Site is located in an urbanized area, and there are no wildlands in the vicinity of the Project Site. Pursuant to Government Code Government Code 51178, the State Fire Marshal is mandated to classify lands into Fire Hazard Severity Zones (FHSZ). Fire Hazard Severity Zones fall into one of the following classifications moderate, high, and very high. FHSZ maps are developed using a science-based and field-tested model that assigns a hazard score based on the factors that influence fire likelihood and fire behavior. Many factors are considered such as fire history, existing and potential fuel (natural vegetation), predicted flame length, blowing embers, terrain, and typical fire weather for the area. Based on a review of California Department of Forestry and Fire Protection's (CALFIRE) 2025 Fire Hazard Severity Zones online mapper, the Project Site is not located within a FHSZ.[58] Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. In addition, the Project's proposed uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, the Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death as a result of exposure to wildland fires. As such, no impact would occur, and no further evaluation of this topic in an EIR is required.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☒	☐	☐	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☒	☐	☐	☐

[58] CALFIRE, Fire Hazards Severity Zones, 6061 Sunset Boulevard, https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones, accessed May 6, 2025.

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

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

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

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

Potentially Significant Impact. A significant impact may occur if a project includes deep excavations which have the potential to interfere with groundwater movement or includes the withdrawal of groundwater or paving of existing permeable surfaces that are important to groundwater recharge. Given the largely impervious (developed/paved) nature of the Project Site, reductions to existing groundwater recharge are not anticipated as a result of Project implementation. During a storm event, stormwater runoff would continue to flow to the adjacent roadways where it is directed into the City's storm drain system. As such, the Project Site is not a source of groundwater recharge. Following

redevelopment of the Project Site, groundwater recharge would remain negligible, similar to existing conditions. However, development of the Project would include excavations to a maximum depth of 77 feet below grade and have the potential to encounter groundwater. Therefore, temporary dewatering may be required during the construction of the proposed subterranean parking levels. As such, further evaluation of potential impacts to groundwater supplies will be provided in an EIR.

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

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

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

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

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

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

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

iv. Impede or redirect flood flows?

No Impact. The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City, and therefore, the risk of flooding would be minimal.[59,60] Thus, the Project would not impede or redirect flood flows. No impacts would occur, and no further evaluation of this topic in an EIR is required.

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

[60] City of Los Angeles, 2024 Local Hazard Mitigation Plan, Figure 13-1, Mapped Flood Hazard Areas in the Central APC, p. 13-16.

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

No Impact. As discussed above, the Project Site is not located within a 100-year flood hazard area as mapped by FEMA or by the City. In addition, the Project Site is located approximately 12 miles northeast of the Pacific Ocean. Therefore, no tsunami or tsunami events would be expected to impact the Project Site and cause any discharge of pollutants. Additionally, there are no standing bodies of water near the Project Site that may experience a seiche, and therefore there is no significant risk that flows from a seiche could result in the discharge of any pollutants from the Project Site caused by the Project.

Earthquake-induced flooding can result from the failure of dams or other water-retaining structures resulting from earthquakes. The Project Site is not located within a combined Very High and High Hazard Dam Inundation Area as mapped by the City.[61]

Considering the above information, the risk of flooding from a tsunami or inundation by a seiche or dam failure is considered low. No impact would occur, 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?

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

XI. LAND USE AND PLANNING

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

[61] City of Los Angeles, 2024 Local Hazard Mitigation Plan, Figure 8-5, Central APC Combined Dam Failure Inundation Area, p. 8-16.

a. Would the project physically divide an established community?

As discussed in Section 3, Project Description, of this Initial Study, the Project proposes the demolition of the existing uses and the development of a 506,050-square-foot mixed-use entertainment office building. These uses would be consistent with the mix of uses located adjacent to and in the general vicinity of the Project Site. In addition, access to the adjacent streets and properties would be maintained throughout construction and operation. Although construction of the Project could result in temporary roadway and/or sidewalk closures, in accordance with standard construction practices, the Project would provide temporary traffic controls such as flag persons to manage traffic movement during temporary traffic flow disruptions. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure safe and adequate access. Furthermore, the Project does not propose a freeway or other large infrastructure that would divide the existing surrounding community. Therefore, Project 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. While the Project is not anticipated to conflict with any land use plans, policies or regulations that were adopted for the purpose of avoiding or mitigating an environmental effect, an EIR will provide further analysis of the Project's consistency with applicable land use plans, policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
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. The Project Site is located within an urbanized area and 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 California Geologic Survey.[62,63] The Project Site is also not located within a City-designated oil field or oil drilling area.[64] As such, the potential for mineral resources to occur on-site is low. Therefore, the Project would not result in the loss of availability of a known mineral resource or a mineral resource recovery site. No impact would occur, and no further evaluation of this topic in an EIR is required.

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

No Impact. No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geological Survey.[65,66] 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 a locally-important mineral resource recovery site. No impact would occur, and no further evaluation of this topic in an EIR is required.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐

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

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

64 City of Los Angeles Department of Public Works, Bureau of Engineering, NavigateLA, Parcel Profile Report, www.ladbsservices2.lacity.org/OnlineServices/PermitReport/ParcelProfileDetail/750010, accessed March 25, 2025.

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

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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. Noise sensitive uses near the Project Site include residential uses to the north and west along Harold Way and La Baig Avenue. During construction activities associated with the Project, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate noise on a short-term basis. In addition, noise levels from on-site sources may increase during operation of the Project. Furthermore, traffic attributable to the Project has the potential to increase noise levels along adjacent roadways. Therefore, further evaluation of this topic will be provided in an EIR.

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

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

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

No Impact. The Project Site is not located within the vicinity of a private airstrip or airport land use plan. The closest private airstrip or airport is the Hollywood Burbank Airport located approximately 7 miles north of the Project Site. Given the distance between the Project Site and the nearest airport, the Project would not expose people residing or working in the Project area to excessive noise levels. Therefore, no impact would occur, and no further evaluation of this topic is required.

XIV. POPULATION AND HOUSING

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

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

Less Than Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project does not include a housing component and thus would not directly introduce a new residential population that contributes to population growth in the vicinity of the Project Site or the Hollywood Community Plan area.

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

Based on employee generation factors from the City of Los Angeles Department of Transportation (LADOT)'s Vehicle Miles Traveled (VMT) Calculator, the Project is estimated to generate a net increase of 1,795 new employees on the Project Site.[67,68] According to SCAG's 2024-2050 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2025 is approximately 2,016,175

[67] LADOT and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. The existing uses to be removed produce approximately 272 employees [(office 68,097 square feet * 0.004). The Project would produce 2,067 new employees [(office 434,581 square feet * 0.004 = 1,738) + (entertainment production 22,265 square feet * 0.002 = 45) + (restaurant 40,324 square feet + outdoor dining areas 21,873 square feet * 0.004 = 249) + (theater 8,880 square feet * 0.004 = 36)]. Therefore, the Project would produce approximately 1,795 net new employees.

[68] The existing occupied uses to be removed include four commercial office buildings.

employees.[69] In 2031, the projected buildout year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 2,078,350 employees.[70] Therefore, the projected employment growth in the City between 2025 and 2031 based on SCAG's 2024–2050 RTP/SCS is approximately 62,175 employees. Thus, the Project's estimated 1,795 net new employees would constitute approximately 2.89 percent of the employment growth forecasted between 2025 and 2031.

While some new Project employees may be anticipated to relocate to the vicinity of the Project Site, many would not. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project Site, and other employees would be expected to commute to the Project Site from other communities both in and outside of the City. Accordingly, the potential indirect increase in population would not be substantial. Therefore, given that the Project would not directly contribute to substantial population growth in the Project area through the development of residential uses and since some of the employment opportunities generated by the Project could be filled by people already residing in the vicinity of the Project Site or others who would commute to the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Further, as the Project would be located in an urbanized area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth. Therefore, the Project would not induce substantial population growth either directly or indirectly. Impacts would be less than significant, and no further evaluation of this topic is required in an EIR.

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

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with four occupied commercial office structures, and three vacant residential bungalows and one back house. Based on the generation rates for the three bungalows and back house provided by LADOT's VMT Calculator, the existing bungalows could house up to approximately nine people.[71] Therefore, further evaluation of potential impacts associated with the displacement of existing people or housing will be included in an EIR.

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

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69 SCAG. Connect SoCal (2024-2050 RTP/SCS). Based on a linear interpolation of SCAG's employment data for the City of Los Angeles for 2019 (1,954,000) and 2035 (2,119,800). The 2025 value is extrapolated from the 2019 and 2035 values to find the average increase between years and then applying that annual increase to 2025: [(2,119,800 – 1,954,000) ÷ 16) * 6] + 1,954,000 = ~ 2,016,175.

70 SCAG. Connect SoCal (2024-2050 RTP/SCS). Based on a linear interpolation of SCAG's employment data for the City of Los Angeles for 2019 (1,954,000) and 2035 (2,119,800). The 2031 value is extrapolated from the 2019 and 2035 values to find the average increase between years and then applying that annual increase to 2031: [(2,119,800 – 1,954,000) ÷ 16) * 12] + 1,954,000 = ~ 2,078,350.

71 Based on the LADOT and Los Angeles DCP, City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020, the generation rate 2.25 persons per unit for "Multi-Family Residential" land use is applied to the three existing bungalows and back house.

construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

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

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

Potentially Significant Impact. LAFD provides fire protection and emergency medical services for the Project Site. The Project would increase the floor area and associated occupancy on-site which could result in the need for additional fire protection services during Project operation. Additionally, construction activities have the potential to result in accidental on-site fires by exposing combustible materials to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. Therefore, further evaluation of this topic will be analyzed in an EIR.

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

Less Than Significant Impact. The Project Site and the surrounding area are currently served by the Los Angeles Police Department's (LAPD) West Bureau and the Hollywood Community Police Station, located at 1358 North Wilcox Avenue (approximately 0.5 miles southwest of the Project Site).[72]

Construction of the Project would not generate a permanent population on the Project Site that would substantially increase the police service population of the Hollywood Community Police Station since the daytime population generated at the Project Site during construction would be temporary in nature.

[72] LAPD, Your LAPD By Division, Hollywood Community Police Station, www.lapdonline.org/lapd-contact/west-bureau/hollywood-community-police-station/?zip=6061%20Sunset%20boulevard%20%20Los%20Angeles%20, accessed March 25, 2025.

In addition, the Project Site would be enclosed with fencing, walls, or other barriers to prevent unauthorized access. Therefore, Project construction would not contribute to an increased demand for police protection services, and impacts would be less than significant.

Project construction could potentially impact the provision of LAPD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. While the majority of construction activities would be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures, roadway/access improvements, and trenching associated with utility line connections. Project construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. However, construction-related traffic, including hauling activities and construction worker trips, would occur outside the typical weekday commuter morning and afternoon peak periods, thereby reducing the potential for traffic-related conflicts. In addition, a construction traffic management plan, which would be required by LADOT, would be implemented during Project construction to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Project's construction traffic management plan would include employing temporary traffic controls, such as flag persons, to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, since emergency access to the Project Site would remain unobstructed during construction of the Project, impacts related to LAPD emergency access would be less than significant.

Based on guidance from the LAPD, the LAPD considers the residential population within their service area to evaluate service capacity. As previously noted, the Project does not include the development of residential uses. Therefore, the Project would not directly affect the existing officer-to-resident ratio within LAPD's Hollywood Area. However, the Project would introduce an increased employee and visitor population to the Project Site, which could result in an indirect demand for police services. These employment opportunities would include a range of full-time and part-time positions, which may be filled, in part, by employees already residing in the vicinity of the Project Site and who are already included in the residential population of the LAPD's Hollywood Area. Other positions may be filled by persons who would commute and who would not relocate their place of residence as a result of working at the Project Site. Overall, given the LAPD's metrics for evaluating service capacity based on residential population, the Project's increase in the police service population would not affect the officer-to-resident ratio for LAPD's Hollywood Area and the officer-to-resident ratio would remain at its current level.

Additionally, as indicated by LAPD in the September 17, 2025, correspondence regarding the police protection impacts of the Project, included as Appendix IS-2 of this Initial Study, the LAPD would be available for advisement on crime prevention features appropriate for the design of the Project. It is noted that as part of the Project, sufficient lighting would be provided throughout the Project Site to ensure safety and visibility and well illuminated entryways, walkways, and parking areas to eliminate areas of concealment. In addition, as set forth in LAPD's correspondence, upon completion of the Project, LAPD encourages the Project Applicant to provide a diagram of the Project to the Area

Commanding Officer to facilitate police response. Therefore, prior to the issuance of a building permit, the Applicant would submit the Project plans to LAPD for review regarding the incorporation of feasible crime prevention features as well as access routes and other information that might facilitate police response. The Project would also generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate. Overall, as determined by the LAPD, the Star Project, individually or combined with other past, present or future projects, will not result in the need for new or altered police facilities. As such, as concluded in the written correspondence from LAPD, Project operation would not necessitate the provision of new or physically altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain LAPD's capability to serve the Project Site.[73] Impacts to police protection services would be less than significant, and no further analysis of this issue in an EIR is required.

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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), which is divided into six local districts. According to the School Finder of the LAUSD, the Project Site is located in Local District (LD) West and is served by Grant Elementary, Joseph Le Conte Middle School, and Hollywood Senior High School.[74,75.]

Construction

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

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[73] Written correspondence from Alfonso Velasco, Public Engagement Section, Crime Prevention Through Environmental Design, Los Angeles Police Department, September 17, 2025. See Appendix XX of this Initial Study.

[74] Los Angeles Unified School District, Local District—West Map.

[75] Los Angeles Unified School District, School Finder, https://rsi.lausd.net/ResidentSchoolIdentifier/, accessed March 25, 2025.

Operation

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of students within the service area of LAUSD. Furthermore, pursuant to SB 50, the Project Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered full legal mitigation of Project-related school impacts. Thus, the Project would not result in the need for new or altered school facilities. Therefore, impacts on school facilities during Project operation would be less than significant, and no further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. As shown in Table 2 on page 64, there are 16 parks and recreational facilities located within a 2-mile radius of the Project Site.

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

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of the new employees generated by the Project could create an additional demand for parks. While it is possible that some of

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

No.[a]	Facility and Address	Distance from Project Site[b] (miles)	Type of Park/ Recreational Facilities
1	**Carlton Way Park** 5927 Carlton Way Los Angeles, CA 90028	0.20	Park
2	**Seily Rodriguez Park** 5707 Lexington Ave. Hollywood, CA 90038	0.54	Park
3	**Hollywood Recreation Center and Pool** 1122 Cole Ave Los Angeles, CA 90038	0.67	Park, Pool
4	**Selma Park** 6567 Selma Ave. (Corner of Selma and Schrader) Los Angeles, CA 90028	0.69	Park
5	**De Longpre Park** 1350 N. Cherokee Ave. Los Angeles, CA 90028	0.84	Park
6	**La Mirada Park** 5401 La Mirada Ave. Los Angeles, CA 90029	0.84	Park
7	**Yucca Park and Community Center** 6671 Yucca St. Hollywood, CA 90028	0.92	Park, Community Center
8	**Las Palmas Senior Citizen Center** 1820 Las Palmas Ave. Los Angeles, CA 90028	0.97	Senior Citizen Center
9	**Lemon Grove Recreation Center** 4959 Lemon Grove Ave. Los Angeles, CA 90029	1.27	Recreation Center
10	**Dorothy and Benjamin Park** 7020 Franklin Ave. Los Angeles, CA 90028	1.29	Park
11	**Barnsdall Art Park** 4800 Hollywood Blvd. Los Angeles, CA 90027	1.53	Park
12	**Burns (Robert L.) Park** 4900 Beverly Blvd. Los Angeles, CA 90004	1.59	Park
13	**Runyon Canyon Park and Dog Park** 2000 N Fuller Ave. Los Angeles, CA 90046	1.65	Park, Dog Park
14	**Griffith Observatory** 2800 East Observatory Rd. Los Angeles, CA 90027	1.82	Observatory
15	**Poinsettia Recreation Center** 7341 Willoughby Ave. Los Angeles, CA 90046	1.83	Recreation Center

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

No.[a]	Facility and Address	Distance from Project Site[b] (miles)	Type of Park/ Recreational Facilities
16	**Wattles Mansion and Gardens** 1824 N Curson Ave. Los Angeles, CA 90046	2.00	Garden

Source: City of Los Angeles Department of Recreation and Park, Facility Map Locator, www.laparks.org/discover-facilities.

these employees may utilize local parks and recreational facilities, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access off-site local parks. In addition, Project employees would be more likely to use parks near their homes during non-work hours. Furthermore, the Project proposes outdoor amenity areas for employees, reducing the likelihood employees would use local parks. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks or the need for new or physically altered parks. Impacts would be less than significant, and no 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, and through Web-based resources.[76] The Project area is served by existing LAPL facilities within the Hollywood Community Plan Area, including the Frances Howard Goldwyn–Hollywood Regional Library, which is the nearest to the Project Site located 0.45 mile northwest.[77]

Construction

As previously discussed, construction of the Project would result in a temporary increase of construction workers on the Project Site. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of Project construction. In addition, construction workers would be more likely to use libraries near their places of residence during non-work hours. Therefore, Project-related construction workers would not result in a notable increase in the resident

[76] Los Angeles Public Library Strategic Plan, 2015–2020.

[77] Los Angeles Public Library, Branch Map, https://lapl.org/branches?distance%5Bpostal_code%5D=90021&distance%5Bsearch_distance%5D=3&distance%5Bsearch_units%5D=mile, accessed March 25, 2025.

population within the service area of either library serving the Project Site or an overall corresponding demand for library services in the vicinity of the Project. As such, construction of the Project would not exceed the capacity of local libraries to adequately serve the existing residential population based on target service populations or as defined by the LAPL. Project construction would not substantially increase the demand for library services for which current demand exceeds the ability of the facility to adequately serve the population. Therefore, Project construction would not result in the need for new or physically altered governmental facilities, and impacts would be less than significant.

Operation

As previously discussed, the Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in a direct increase in the number of residents within the service population of the local LAPL facilities. In addition, Project employees would have internet access to LAPL and other web-based resources, decreasing the demand on library facilities. Furthermore, as Project employees would be more likely to use library facilities near their homes during non-work hours and given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, Project employees and the potential indirect population generation that could be attributable to those employees would generate minimal demand for library services. Therefore, impacts on new or physically altered governmental facilities including library facilities would be less than significant, and no further evaluation of this topic 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 facilities would occur or be accelerated?

Less Than Significant Impact. As discussed above in Response to Checklist Question XV.d., the Project would not generate a new residential population that would regularly utilize nearby parks and recreational facilities, and any use of local parks and recreational facilities is anticipated to be limited. The new employment opportunities generated by the Project may be filled, at least in part, by employees presently residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, only a fraction of new Project employees would be expected to create new demand

for local parks and recreational facilities, and such use is anticipated to be limited due to work obligations and the travel time necessary to access off-site parks and recreational facilities. In addition, Project employees are often more likely to use parks and facilities near their homes during non-work hours. Furthermore, the Project proposes on-site outdoor amenity areas for Project employees, thus reducing the likelihood that employees would use local parks and recreational facilities. Therefore, impacts related to parks and recreational facilities would be less than significant, and no further analysis of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed above in Response to Checklist Question XV.d and XVI.a, the Project would not generate a new residential population that would regularly utilize nearby public parks and recreational facilities and would not require construction or expansion of public recreational facilities. Therefore, impacts with respect to the construction or expansion of recreational facilities would be less than significant, and no further evaluation of this topic in an EIR is required.

XVII. TRANSPORTATION

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

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

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

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

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

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

The Project is anticipated to meet one or more of the thresholds listed above; therefore, a Transportation Assessment in accordance with LADOT's Transportation Assessment Guidelines (TAG) will be prepared for the Project. In accordance with the TAG and consistent with the City CEQA Transportation Thresholds (adopted July 30, 2019), the transportation assessment's CEQA-required analyses will include an assessment of whether the Project would result in potential conflicts with transportation-related plans, ordinances, or policies. Therefore, further evaluation of this topic will be included in an EIR.

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

Potentially Significant Impact. SB 743, which went into effect in January 2014, required the Governor's Office of Planning and Research to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis has shifted from driver delay, which is typically measured by traffic level of service (LOS), to a new measurement that better addresses the State's goals on reduction of greenhouse gas emissions, creation of a multi-modal transportation, and promotion of mixed-use developments. CEQA Guidelines Section 15064.3 states that VMT is the most appropriate measure of transportation impacts, replacing LOS; specifically, subdivision (b) states that development projects that increase VMT may have a potentially significant impact, while those that decrease VMT are presumed to have a less-than-significant impact.

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 office, studio, and commercial uses. As a result, VMT could increase over existing conditions. Therefore, further evaluation of this topic will be provided in an EIR.

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

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

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

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. The Project Site is located in an established urban area that is well-served by the surrounding roadway network. According to the City's GeoHub system, The nearest emergency/disaster route to the Project Site is Santa Monica Boulevard 0.6 mile south of the Project Site.[78] 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. As discussed previously, a construction traffic management plan would be required by LADOT and would be implemented during Project construction. If lane closures are necessary, both directions of travel would continue to be maintained in accordance with the construction traffic management plan to ensure adequate circulation and emergency access. In addition, while operation of the Project would generate vehicle trips in the Project vicinity and would result in limited modifications to Project Site access, the Project would comply with LAFD access requirements and would not impede emergency access within the Project vicinity. Therefore, the Project would not result in inadequate emergency access. Impacts 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	☒	☐	☐	☐

[78] City of Los Angeles, Geohub, Disaster Routes, https://geohub.lacity.org/datasets/lacounty::disaster-routes-1/explore?location=34.062986%2C-118.234620%2C18.63, accessed March 25, 2025.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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.

As previously discussed, the Project would require excavations that extend up to 77 feet below existing grade. As such, construction activities could potentially disturb any existing buried tribal cultural resources. Therefore, the potential exists for the Project to impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with AB 52, the City notified all applicable tribes on June 8, 2022, and the City will participate in any requested consultations for the Project. Further analysis of this topic will be provided in an EIR.

XIX. UTILITIES AND SERVICE SYSTEMS

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

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

Potentially Significant Impact (Water, Wastewater, Electric Power, Natural Gas, Stormwater)/Less Than Significant Impact (Telecommunications Facilities). Water, wastewater, electric power, and natural gas systems consist of two components, including 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 over the existing conditions within the Project Site and the potential corresponding increase in water, electricity, and, potentially, natural gas demand and wastewater generation, further analysis of these topics will be provided in an EIR.

Regarding stormwater drainage, as discussed above in Response to Checklist Question X.c.iii., potential changes in drainage patterns on-site could create or contribute runoff which could exceed the capacity of the local stormwater drain system. As such, potential impacts will be evaluated in an EIR.

Telecommunications Facilities

The Project would be required to construct new on-site telecommunications infrastructure to serve the new building 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 the ground surface. Such activities could involve temporary closure of portions of sidewalks or travel lanes. However, the Project would implement a construction traffic management plan during construction, which would be required by LADOT and 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 network. 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, the Project would increase demand for water provided by LADWP. Therefore, further evaluation of this topic will be provided in an EIR.

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

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

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

Less Than Significant Impact. While the Los Angeles Bureau of Sanitation (LASAN) generally provides solid waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide solid 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.[79] Ten Class III landfills and one inert landfill are currently operating within the County.[80] 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.[81]

Based on the 2021 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the most recent report available, the total remaining permitted Class III landfill capacity in the County is estimated at 137.09 million tons.[82] The estimated remaining capacity for the County's Class III landfills open to the City is approximately 127.44 million tons.[83] In addition, the permitted inert waste landfill serving the County, the Azusa Land Reclamation facility, has 50.77 million tons of remaining capacity.[84] Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the CoIWMP Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.[85]

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

Construction

As summarized in Table 3 on page 74, based on construction and debris rates established by the U.S. Environmental Protective Agency (USEPA), it is anticipated that construction of the Project would generate a total of approximately 5,648 tons of demolition debris and approximately 1,035 tons of construction debris, for a combined total of 6,683 tons of construction-related waste before the implementation of required/proposed recycling.

Signed in 2002, the Construction and Demolition Waste Materials Diversion Requirements (Senate Bill [SB] 1374) were codified in PRC Section 42919. SB 1374 requires that jurisdictions include in their

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

80 County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022. 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.

81 County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022.

82 County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022.

83 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).

84 County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022.

85 County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2021 Annual Report, December 2022.

Table 3
Project Demolition and Construction Waste Generation and Disposal

Land Use	Size	Generation Rate (lbs/sf)[a]	Total (tons)[b]
Demolition Waste			
Four Commercial Office Buildings	68,097 sf	155	5,278
Three Bungalows	4,780 sf	155	370
Total Demolition Waste			*5,648*
Construction Waste			
Office	434,581 sf	3.89	845
Restaurant + Outdoor Restaurant Areas[c]	62,197 sf	3.89	121
Entertainment Production/Production Support + Ancillary Basecamp Area[d]	26,325 sf	3.89	51
Theater (200 Seats)	8,880 sf	3.89	17
Total Construction Waste			*1,035*
Total Demolition and Construction Waste (prior to diversion)			**6,683**
Total Disposal (After 75% Diversion)			**1,671**

lbs = pound

sf = square feet

[a] *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; Based on the non-residential demolition debris generation rate of 155 pounds per square foot and the non-residential construction debris generation rate of 3.89 pounds per square foot.*

[b] *1 ton is equal to approximately 2,000 pounds.*

[c] *The Project includes a total of 21,873 square feet of outdoor dining areas–20,173 square feet located on roof top (levels 27 to 29) and 1,700 square feet located on the ground floor; however, these areas are not included as part of the total floor area since they are not floor area per LAMC Section 12.03. To ensure a conservative analysis, the Initial Study applies a full-service restaurant use.*

[d] *The Project also includes 4,060 square feet of ancillary basecamp area; however, this area is not included as part of the total floor area since it is not floor area per LAMC Section 12.03. To ensure a conservative analysis, the Initial Study applies a production use.*

Source: Eyestone Environmental, 2025.

annual AB 939 report a summary of the progress made in diverting construction and demolition waste. Pursuant to the requirements of SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of 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 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 3 on page 74, the Project would generate a total of approximately 1,671 tons of construction and demolition waste. It should be noted that soil export is not typically included in the calculation of construction waste to be landfilled since soil is not disposed of as waste but, rather, is typically used as a cover material or fill at other construction sites requiring soils import. Given the remaining capacity at the Azusa Land Reclamation facility, which is approximately 50.77 million tons, as well as the remaining 127.44 million tons of capacity at the Class III landfills serving the County, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

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

Operation

As shown in Table 4 on page 76, based on solid waste generation factors from LASAN, the Project would generate approximately 3,613net 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 take into account 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 take into account 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 3,613 tons per year represents approximately 0.003 percent of the remaining capacity (127.44 million tons) at the County's Class III landfills that serve the County.[86] 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. Therefore, the Project's potential impacts to solid waste facilities during operation of the Project would be less than significant, and no further analysis of this topic in an EIR is required.

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

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated

[86] (3,613 tons per year ÷ 127.44 million tons) * 100 = 0.003 percent.

Table 4
Estimated Project Solid Waste Generation

Land Use	Size	Employee Generation Rate[a]	Estimated No. of Employees	Solid Waste Generation Rate[b]	Total Generation (tons/year)
Existing to Be Removed					
Four Commercial Office Buildings	68,097 sf	0.004	272	2.02 tn/emp/yr	550
Three Bungalows	1,780 sf	0.004	7	2.02 tn/emp/yr	14
Vacant Bungalows	3,000 sf	0	0	—	—
Total Existing to Be Removed					564
Proposed					
Office	434,581 sf	0.004	1,738	2.02 tn/emp/yr	3,511
Restaurant + Outdoor Restaurant Areas[c]	62,197 sf	0.004	248	1.92 tn/emp/yr	478
Entertainment Production/Production Support + Ancillary Basecamp Area[d]	26,325 sf	0.002	52	2.02 tn/emp/yr	106
Theater (200 Seats)	8,880 sf	0.004	35	2.3 tn/emp/yr	82
Total with Implementation of Project					4,177
Total Net Increase (prior to diversion)					3,613
Total Net Disposal (after 50% diversion/recycling)					1,807

tn = tons

emp = employees

yr = year

[a] *Project employee generation rates from Los Angeles Departments of Transportation and City Planning, City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. Assumes general office rate for office uses and theater; general retail rate for entertainment production/production support uses and ancillary basecamp area; and high-turnover restaurant rate for restaurant uses and outdoor restaurant areas.*

[b] *Solid waste generation rates are from CalRecycle's Disposal and Diversion Rates for Business Groups, www2.calrecycle.ca.gov/wastecharacterization/businessgrouprates, accessed July 2, 2025. . Assumes Services - Professional, Technical, & Financial rate for office uses, entertainment production/production support uses, and ancillary basecamp area ; Restaurants rate for restaurant uses and outdoor restaurant areas; and Arts, Entertainment, & Recreation rate for theater use.*

[c] *The Project includes a total of 21,873 square feet of outdoor dining areas–20,173 square feet located on roof top (level 29) and 1,700 square feet located on the ground floor; however, these areas are not included as part of the total floor area since they are not floor area per LAMC Section 12.03. To ensure a conservative analysis, the Initial Study applies a full-service restaurant use.*

[d] *The Project also includes 4,060 square feet of ancillary basecamp area; however, this area is not included as part of the total floor area since it is not floor area per LAMC Section 12.03. To ensure a conservative analysis, the Initial Study applies a production use.*

Source: Eyestone Environmental, 2025.

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

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.[87] 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 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
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

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

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

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

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

No Impact. As discussed above, the Project Site has a relatively flat topography, is currently developed, and is located in an urbanized area. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zones (VHFHSZ) or a City-designated fire buffer zone.[88,89] Further, pursuant to Government Code Government Code 51178, the State Fire Marshal is mandated to classify lands into Fire Hazard Severity Zones (FHSZ). Fire Hazard Severity Zones fall into one of the following classifications moderate, high, and very high. FHSZ maps are developed using a science-based and field-tested model that assigns a hazard score based on the factors that influence fire likelihood and fire behavior. Many factors are considered such as fire history, existing and potential fuel (natural vegetation), predicted flame length, blowing embers, terrain, and typical fire weather for the area. Based on CALFIRE's 2025 Fire Hazard Severity Zones online mapper, the Project Site is not located within a

[88] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 5545-008-011, -012, -044, http://zimas.lacity.org/, accessed November 18, 2024 and March 21, 2025.

[89] City of Los Angeles, 2018 Local Hazard Mitigation Plan, West Los Angeles APC, Figure 13-8, Wildfire Severity Zones, p. 13-10.

FHSZ.[90] Therefore, the Project Site is not located in or near State responsibility areas or lands classified as Very High Fire Hazard Severity Zones.

Based on the above, the Project would not result in impacts related to impairing an adopted emergency response plan or emergency evaluation plan within a wildfire area; exacerbate wildfire risks; require improvements that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or expose people or structures to significant risks a result of runoff, post-fire slope instability, or drainage changes. No impacts regarding wildfire risks or related post-fire conditions would occur, and no further evaluation of this topic in an EIR is required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
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 previously discussed, the Project is located in a highly urbanized area and does not serve as habitat for fish or wildlife species. In addition, no sensitive plant or animal

[90] CALFIRE, Fire Hazards Severity Zones, 6061 Sunset Boulevard, https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones, accessed May 6, 2025.

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 previously discussed, the three existing bungalows on the Project Site have been designated as contributors to the Selma–La Baig Historic District. Additionally, the Project would require excavation up to approximately 77 feet below existing grade, and the Project could have the potential to disturb previously undiscovered archaeological, paleontological, and tribal cultural resources. As such, further evaluation of the Project's potential impacts related to these topics 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 an EIR for the following subject areas: air quality; cultural resources; energy; geology and soils (including paleontological resources); greenhouse gas emissions; hazards and hazardous materials (release of hazardous materials into the environment and hazardous materials sites); hydrology and water quality, land use and planning; noise; public services (police protection and fire protection); transportation; tribal cultural resources; and utilities and service systems (water supply, wastewater, electric power, and natural gas systems).

- **Aesthetics**—Pursuant to SB 743 and ZI No. 2452, the Project is considered an employment center project on an infill site within a TPA, 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.

- **Agriculture, Forestry Resources, and Mineral Resources**—With regard to agriculture, forestry 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)**— No objectionable odors are anticipated as a result of either construction or operation of the Project. Additionally, like the Project, any odors that may be generated during construction of the related projects would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. Furthermore, it

is anticipated that the related projects would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations, like the Project. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **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 MBTA, which regulates vegetation removal 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.

- **Geology and Soils (Substantial Soil Erosion or the Loss of Top Soil, Landslides and septic tanks)**—Due to their site-specific nature, geology and soils impacts, including those related to substantial soil erosions or the loss of top soil, landslides, and the ability of soils to support septic tanks or alternative wastewater disposal systems, 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 than significant.

- **Hazards and Hazardous Materials**—Due to their site-specific nature, hazards and hazardous materials impacts are typically assessed on a project-by-project basis. Therefore, as with the Project, related projects would address site-specific hazards through the implementation of site-specific recommendations and/or mitigation measures. In addition, as with the Project, all related development located in the vicinity of the Project Site would be subject to local, regional, state, and federal regulations pertaining to hazards and hazardous materials. Therefore, with adherence to applicable regulations and implementation of site-specific recommendations and/or mitigation measures, cumulative impacts would be less than significant.

- **Hydrology and Water Quality (Impede or redirect floods and inundation)**—Due to their site-specific nature, impacts related to projects impeding or redirecting floods and inundation are typically assessed on a project-by-project basis. Therefore, as with the Project, related projects would address site-specific hazards through the implementation of site-specific recommendations and/or mitigation measures. In addition, as with the Project, all related development located in the vicinity of the Project Site would be subject to local, regional, state, and federal regulations pertaining to hydrology. Therefore, with adherence to applicable regulations and implementation of site-specific recommendations and/or mitigation measures, 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- and project-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.

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

- **Population**—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. As discussed in the analysis above, the Project does not propose residential uses and thus would not directly contribute to population growth. As part of the environmental review processes for the related projects, it is expected that mitigation measures would be established as necessary to address potential impacts related to population. Thus, the Project impacts related to population and housing would not be cumulatively considerable, and cumulative impacts would be less than significant.

- **Public Services (Police Protection, Schools, Parks, 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 police protection, schools, parks and recreational facilities, and libraries in the vicinity of the Project Site.

  With regard to operation, the Project would not generate a residential population that would directly increase the demand for police protection, schools, parks and recreational facilities, and libraries. Related projects could increase the demand for these services and facilities. With regard to police protection, the cumulative increase in demand for police protection services would increase the demand for additional LAPD staffing, equipment, and facilities over time. Similar to the Project, other projects served by LAPD would implement safety and security features according to LAPD recommendations. LAPD would also continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's annual budgeting efforts, LAPD's resource needs would be identified, and monies allocated according to the priorities at the time. Any new or expanded police station would be funded via existing mechanisms (e.g., property and sales taxes, government funding, and developer fees) to which the Project and cumulative growth would contribute. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

  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 also 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 recreational facilities, and libraries. As such, the Project's contribution would not be cumulatively considerable, and, therefore, 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 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**—As discussed above, the Project Site is located in an urbanized area, is not located within a VHFHSZ, 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. Further, any related projects located within a FHSZ may be subject to implementation of site-specific recommendations and/or mitigation measures, and 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 than significant.

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

Potentially Significant Impact. Based on the analysis contained in this Initial Study, the Project could result in potentially significant impacts with regard to the following topics: air quality; cultural resources; energy; geology and soils (including paleontological resources); greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; noise; public services (fire protection); transportation; tribal cultural resources; and utilities and service systems (water supply, wastewater, electric power, and natural gas systems). Further evaluation of the Project's potential impacts to these topics will be included in an EIR.